CITY OF DETROIT

Policies and Procedures Manual for Community Development Block Grant (CDBG) and Emergency Solutions Grants (ESG) Homeless Programs

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Published September 2018
Updated March 2021

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Section 1: General Information and Background

Purpose of This Document

This document is intended to serve as a guide for subrecipients of the City of Detroit's Emergency Solutions Grants (ESG) Program. The document provides an overview of the ESG Program, outlines the requirements for effectively using grant funds, and describes the policies and procedures for conducting activities under the ESG Program. Please note programs receiving ANY City of Detroit funds through the ESG or CDBG match program (also known as Homeless Public Service) are bound by the information contained in this manual.

It is important to note that this document summarizes various grant requirements and is not intended to replace the regulations in 24 CFR Part 576 or any applicable federal, state, or local laws. In addition to this document, subrecipients should also reference the program regulations and the grant agreement to ensure compliance with the requirements of the ESG Program.

There are supplemental policy and procedure manuals that should be used referenced as needed.

- Rapid Re-Housing Policy and Procedures
- HCV Policy and Procedures
- ESG-CV Policy and Procedures

How to Use This Document

Subrecipients can use this document as an ongoing reference guide throughout the implementation of their ESG-funded program. The document is organized into sections that can be easily referenced using the table of contents.

The applicable rules for any specific project depend on both the source of funds (Detroit Continuum of Care funds or Emergency Solutions Grants funds through the City of Detroit Office of Housing and Revitalization) and the particular program component for which the funds are designated. As such, not every section of this manual is applicable to every program.

This manual has been organized into subsections that are most relevant to each program component type in order to provide easy access to applicable sections for any given provider. Readers who are unsure under which component their project is funded should refer to their grant agreement and the descriptions of ESG program components. If additional questions arise, please contact the City of Detroit for additional information about program requirements and effective implementation strategies of the ESG Program.

Guiding Principles

To ensure continuity and consistency within City of Detroit ESG-funded programs, subrecipients should follow the guiding principles outlined below when implementing their programs:

- Housing is a basic human need; providers must ensure that housing options offered to clients are accessible, safe, and affordable;
- Programs should first ensure that a client's basic needs are met (food, housing, clothing, etc.) prior to focusing on other needs (recovery, employment, education, etc.) based on the client's situation and their requests for specific types of assistance;
- Clients have the right to set their own goals and make their own decisions, even if their goals are different than those of the service provider. Service providers should work to reduce as many barriers to services as possible;
- Clients are the experts in what they need and how they can achieve their goals. A client's strengths and assets should always be leveraged and considered in service delivery;
- Every person has inherent dignity and worth; service providers should treat all clients with respect, being mindful of individual differences and cultural and ethnic diversity;
- Clients have a right to privacy, confidentiality, and to be informed of their rights (especially related to their records, program termination, grievances, etc.);
- Services delivered to clients should promote client well-being and work to integrate the client with mainstream resources and the larger community as much as possible.

What is ESG?

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) revised the Emergency Shelter Grants Program and renamed it the Emergency Solutions Grants (ESG) Program. The ESG Interim Rule went into effect on January 4, 2012.

The ESG Program provides funding in order to: (1) engage homeless individuals and families living on the street; (2) improve the number and quality of emergency shelters for individuals and families experiencing homelessness; (3) help operate these shelters; (4) provide essential services to shelter residents; (5) rapidly rehouse homeless individuals and families; and (6) prevent families/individuals from becoming homeless. ESG funds can be used for five program components: street outreach, emergency shelter, homelessness prevention, Rapid Re-Housing assistance, and HMIS. Though not a program component, funds may also be used for necessary administrative activities.

For more information about the ESG Program, including program guides and tools, visit the ESG Program page on the HUD Exchange website.

City of Detroit Contact Information

Staff working at the City of Detroit's Housing and Revitalization Department maintain traditional business hours and can be contacted at:

Phone: 313.224.6380
Website: http://www.detroitmi.gov/HRD

Frequently Used Terms and Definitions

Americans with Disabilities Act (ADA) Compliance

The City of Detroit requires all ESG-funded shelters to comply with the ADA regulations.

The ADA and Section 504 both stipulate that "no otherwise qualified person with disabilities shall, solely by reason of his or her disability, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance." The Fair Housing Amendments Act regulations state "it shall be unlawful for any person to refuse to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford a person with a disability equal opportunity to use and enjoy a dwelling unit including public and private use areas."

Continuum of Care

A Continuum of Care (CoC) is a regional or local planning body that coordinates housing and services funding for homeless families and individuals. The Detroit CoC oversees homeless services in Detroit, Highland Park, and Hamtramck.

Definitions of Homelessness

Category 1: Literally Homeless

An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

1. 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.
2. 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).
3. 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.

Category 2: Imminent Risk of Homelessness

An individual or family who will imminently lose their primary nighttime residence, provided that:

1. The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance.
2. No subsequent residence has been identified
3. 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.

Category 3: Homeless Under Other Federal Statutes (NOTE: CoC Program-funded projects are not authorized by HUD to serve this category)

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:

1. Are defined as homeless under section 387 of the Runaway and Homeless 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)
2. 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
3. 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
4. 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.

Category 4: Fleeing/Attempting to Flee Domestic Violence

Any individual or family who:

1. 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;
2. Has no other residence; and
3. Lacks the resources or support networks, e.g., family, friends, and faith-based or other social networks, to obtain other permanent housing. 24 CFR 578.3. Chronically Homeless McKinney-Vento Act.

Definition of Chronically Homeless

HEARTH/ McKinney Vento Act (24 CFR 91.5 and 24 CFR 578.3) defines Chronically Homeless as:

1. A homeless individual, who: Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least 12 months or on at least 4 separate occasions in the last 3 years where the combined occasions must total at least 12 months.
    a. "Occasions" must be separated by a break of at least seven nights.
    b. Stays in institution of fewer than 90 days do not constitute a break in homelessness;

       AND

    c. Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability; **OR**
2. An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; **OR**
3. A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraphs (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

Developmental Disability

Developmental disability is defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act of 2000 (42 U.S.C.15002) as:

1. A severe, chronic disability of an individual that— (i) Is attributable to a mental or physical impairment or combination of mental and physical impairments; (ii) Is manifested before the individual attains age 22; (iii) Is likely to continue indefinitely; (iv) Results in substantial functional limitations in three or more of the following areas of major life activity: (A) Selfcare; (B) Receptive and expressive language; (C) Learning; (D) Mobility; (E) Self-direction; (F) Capacity for independent living; (G) Economic self-sufficiency; and (v) Reflects the individual's need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.
2. An individual from birth to age 9, inclusive, who has a substantial developmental delay or specific congenital or acquired condition, may be considered to have a developmental disability without meeting three or more of the criteria described in paragraphs (1) (i) through (v) of the definition of ''developmental disability'' in this

section if the individual, without services and supports, has a high probability of meeting those criteria later in life. 24 CFR 583.5

Disabling Condition

1. A condition that: (i) Is expected to be long-continuing or of indefinite duration; (ii) Substantially impedes the individual's ability to live independently; (iii) Could be improved by the provision of more suitable housing conditions; and (iv) Is a physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury;
2. A developmental disability, as defined in this section; or
3. The disease of acquired immunodeficiency syndrome (AIDS) or any conditions arising from the etiologic agent for acquired immunodeficiency syndrome, including infection with the human immunodeficiency virus (HIV). 24 CFR 583.5

Emergency Shelter

Any facility where the primary purpose is to provide a temporary shelter for the homeless in general or for specific populations of the homeless. Emergency shelters do not require occupants to sign leases or occupancy agreements. Emergency shelters are expected to have low barriers to project entry and participation, and to have a primary focus on moving clients to permanent housing solutions as quickly as possible.

Equal Access

Federal regulations that require that all HUD-funded services and housing shall be made available without regard to actual or perceived sexual orientation, gender identity, or marital status. No recipient or subrecipient of HUD funds may inquire about the sexual orientation or gender identity of an applicant for, or occupant of, HUD-assisted housing for the purpose of determining eligibility for the housing or otherwise making such housing available. This prohibition on inquiries regarding sexual orientation or gender identity does not prohibit any individual from voluntarily self-identifying sexual orientation or gender identity. This prohibition on inquiries does not prohibit lawful inquiries of an applicant or occupant's sex where the housing provided or to be provided to the individual is a temporary emergency shelter that involves the sharing of sleeping areas or bathrooms, nor does it prohibit inquiries made for the purpose of determining the number of bedrooms to which a household may be entitled. For additional information, please visit the HUD Exchange page on Equal Access.

Federal Fair Housing Act

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, as well as in other housing-related transactions based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and disability. For additional information, please see the HUD page on the Fair Housing Act.

Fair Market Rent (FMR)
FMRs are gross rent estimates. The U.S. Department of Housing and Urban Development (HUD) annually estimates FMRs for 530 metropolitan areas and 2,045 nonmetropolitan county areas. HUD sets FMRs to assure that a sufficient supply of rental housing is available to program participants. By law, HUD is required to publish new FMRs at the start of each federal fiscal year on October 1.

Fair Market Rents are updated by HUD every year and can be found online at: http://www.huduser.org/portal/datasets/fmr.htm

Family/Household
HUD definition of family includes, but is not limited to, the following, regardless of actual or perceived sexual orientation, gender identity, or marital status:

1. A single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person; or
2. A group of persons residing together, and such group includes, but is not limited to: (i) A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family). 24 CFR 5.403
3. Section 576.102(b) of the ESG interim rule prohibits ESG-funded programs from denying a family admission to an ESG-funded program or ESG-funded services based on the age of a child under the age of 18 if the program provides services to families with children.

Clarity on the Definition of Family
According to HUD, a family is simply one or more individuals who live together. Members of the family do not need to be related by blood, marriage, or in any other legal capacity. Family members who are away from the household for a certain period of time may be considered part of the family. Live-in aides are also considered a family member. HUD's definition of family is broad to help make sure decent and affordable housing is available to every type of family.

Housing First
Housing First emerged as an alternative to the linear approach in which people experiencing homelessness were required to first participate in and graduate from short-term residential and treatment programs before obtaining permanent housing. In the linear approach, permanent housing was offered only after a person experiencing homelessness could demonstrate that they were "ready" for housing. By contrast, Housing First is premised on the following principles:

- Homelessness is first and foremost a housing crisis and can be addressed through the provision of safe and affordable housing.
- All people experiencing homelessness, regardless of their housing history and duration of homelessness, can achieve housing stability in permanent housing. Some may need

very little support for a brief period of time while others may need more intensive and long-term supports.

- Everyone is "housing ready." Sobriety, compliance in treatment, or even criminal histories are not necessary to succeed in housing. Rather, homelessness programs and housing providers must be "consumer ready."
- Many people experience improvements in quality of life in the areas of health, mental health, substance use, and employment, as a result of achieving housing.
- People experiencing homelessness have the right to self-determination and should be treated with dignity and respect.
- The exact configuration of housing and services depends upon the needs and preferences of the population.

While the principles of Housing First can be applied to many interventions and as an overall community approach to addressing homelessness, this document focuses on Housing First in the context of permanent supportive housing models for people experiencing chronic homelessness.

Homeless Management Information System (HMIS)

HMIS is the information system designated by the Continuum of Care to comply with HUD's data collection, management, and reporting standards. It is used to collect client-level data and data on the provision of housing and services to homeless individuals and families as well as persons at-risk of homelessness.

Low-Barrier

Low-barrier services and housing place a minimum number of expectations on people requesting assistance. The aim is to have as few barriers as possible to allow more people access to services. This model often means that program participants are not expected to abstain from using alcohol or other drugs, or from carrying on with street activities while engaging in services or living on-site, so long as they do not engage in these activities in common areas and are respectful of other tenants and staff. Low-barrier facilities follow a harm reduction philosophy.

Permanent Housing (PH)

Permanent housing has no length of stay limitation. Residents of permanent housing maintain legal protections under local, state, and federal laws through a lease agreement for a term of at least one year. After one year, the lease is eligible for renewal or termination as per the terms of the lease. Permanent Housing is community-based housing and may include market-rate housing, subsidized housing, permanent supportive housing, and Rapid Re-Housing.

Permanent Supportive Housing (PSH)

Permanent Supportive Housing is long-term housing with no defined limitation of participation. Residents of Permanent Supportive Housing sign lease agreements with the property owner or management and maintain full tenancy rights under local, state, and federal laws. In addition to permanent housing, PSH offers supportive services on a voluntary

basis to assist formerly homeless persons in living independently and successfully maintaining the terms of their lease.

Rapid Re-Housing (RRH)

Rapid Re-Housing is an intervention, informed by a Housing First approach that is a critical part of a community's effective homeless crisis response system. Rapid Re-Housing rapidly connects families and individuals experiencing homelessness to permanent housing through a tailored package of assistance that may include the use of time-limited financial assistance and targeted supportive services. Rapid Re-Housing programs help families and individuals living on the streets or in emergency shelters solve the practical and immediate challenges to obtaining permanent housing while reducing the amount of time they experience homelessness. Rapid Re-Housing also helps families and individuals avoid a near-term return to homelessness and links them to community resources that enable them to achieve housing stability in the long-term. Rapid Re-Housing is an important component of a community's response to homelessness. A fundamental goal of Rapid Re-Housing is to reduce the amount of time a person is homeless.

Details on the provision of supportive services that can be provided are set forth in 24 CFR 578.53. Tenant-based rental assistance provided through RRH can be short-term (up to 3 months) and/or medium-term (for 3 to 24 months), as set forth in 24 CFR 578.51(c).

Rent Reasonableness

The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units.

In many areas, the easiest way to determine rent reasonableness is to use a housing database search engine that will compare units and rents against one another. One option is Michigan Housing Locator. Other local resources (such as market surveys, classified ads, and information from real estate agents) may also be used to obtain information. When comparing rent reasonableness, the proposed unit must be compared to three other units.

For additional information on rent reasonableness under the Continuum of Care Program, please review this HUD Exchange Resource.

Rent Reasonableness and Fair Market Rent (FMR)

Rental assistance may only be utilized on eligible housing units whose total rent does not exceed the fair market rent (FMR) established by HUD, as provided under 24 CFR § 982.503. The total rent for the eligible unit must also comply with HUD's standard of rent reasonableness, as established under 24 CFR § 982.507. These rent restrictions are intended to ensure that program participants can remain in their housing after their ESG assistance ends.

Rent reasonableness and FMR requirements are not applicable when an agency is only providing financial assistance or services under Housing Stabilization and Relocation Services. Such services include: rental application fees, security deposits, an initial payment of last month's rent, utility payments/deposits, moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, legal services, credit repair. Note that this guidance only applies to ESG homeless prevention and Rapid Rehousing. For guidance on CoC rules regarding FMR and rent reasonableness, please consult the following HUD Exchange resource.

For more information about calculating rent reasonableness and FMR, please review this HUD Exchange Resource.

Subrecipient

Subrecipient refers to a private nonprofit organization, or unit of local government that receives a contract for CoC or ESG funds from a recipient to carry out a project. The term subrecipient replaces the terms "project sponsor" and "subgrantee." Although the term subrecipient is used throughout this manual, in other context, MSDHA may refer to ESG subrecipients as "grantees."

Transitional Housing (TH)

Transitional housing is community and/or program sponsored housing with a defined limitation of participation of up to 24 months. Residents of transitional housing sign a lease or occupancy agreement for a term of at least one month and may be offered supportive services to locate and secure permanent housing and to support a household's ability to successfully maintain the terms of a lease agreement. Transitional Housing is designed to facilitate the movement of homeless individuals and families into permanent housing within 24 months. The program participation cannot be extended past the 24-month expiration. 24 CFR§ 578.3

Victim Service Providers

Victim service providers are private nonprofit organizations whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, battered women's shelters, domestic violence transitional housing programs, and other programs. Victim Service Providers play an integral part in protecting vulnerable persons. As a result, HUD has created additional and alternative policies to protect both the personal information and personal safety of clients served by these agencies. For additional information on protecting persons seeking safety or HUD's policies for victim service providers please review this HUD Exchange Resource.

Section 2: Funding Process and Requirements

Summary

The Emergency Solutions Grants (ESG) Program was established through the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act). ESG regulations were established in an interim rule published in the Federal Register on December 5, 2011. The U.S. Department of Housing and Urban Development (HUD) administers the ESG Program and allocates funding to recipients each year. In Detroit, the City of Detroit's Office of Housing and Revitalization applies for and administers ESG funds.

Grant Awards and Spending Requirements

The City of Detroit receives an ESG allocation from HUD each year. As an ESG recipient, Detroit is required to consult with the local Continuum of Care to determine how to allocate ESG funds to subrecipients. The grant amount, except for administrative costs, must be obligated by the City of Detroit within 180 days after the date that HUD signs the grant agreement. Funds are considered obligated through either an agreement or award letter with a subrecipient that stipulates the required payment; a procurement contract; or a written designation of a department within the City of Detroit government to carry out an eligible activity.

In Detroit, organizations receive notification of their grant award through the receipt of an "award letter". The award letter will list a date by which organizations are expected to submit a scope and budget for the project. Please note that organizations are expected to respond to request for contract documentation by the date outlined on their award letter in order to expedite the contracting process.

Detroit must draw down and expend funds from the year's grant at least once per quarter of the program year. The full grant amount must be expended within 24 months after the date that HUD signs the grant agreement. The City of Detroit is required to pay subrecipients for eligible activities within 30 days after receiving a payment request.

Subrecipients are expected to spend the funds provided within the initial grant term. Requests for extension must occur 90 days prior to contract expiration in order to be considered. Repeated extension requests may result in a reduction in future grant awards. Organizations who are not on track to expend their awarded contract three months into the contract will be expected to submit a spend plan. If the organization is still not on track at six months, the City of Detroit reserves the right to reallocate the funds to a proven spender.

Additional information about obligation, expenditure, and payment requirements can be found in 24 CFR 576.203.

Subrecipients must request payment from the City of Detroit using the invoicing process outlined in this manual, once their ESG contract is in place. Subrecipients requesting reimbursement must adhere to the following:

- Submit program reimbursement requests and supporting documentation by the 15th of each month for the previous month.
- Provide the Exhibit E reports from HMIS as part of the submission package.
- Submit electronic copy of the reimbursement packages to the City of Detroit's Housing and Revitalization Department at hsbilling@detroitmi.gov.

Failure to submit timely requests for reimbursement can result in reallocations, reductions in awards, or loss of future program funding.

After review and submission of payment documentation, subrecipients will be notified of any deficiencies and/or disallowed costs. Following City of Detroit approval, requested invoices should be uploaded to the iSupplier portal for reimbursement. The City of Detroit is committed to timely reimbursement of subrecipients and has created internal timeliness expectations to meet this requirement, however, the 30-day payment clock begins when a **complete** reimbursement package is submitted by the subrecipient.

Payments should be emailed to hsbilling@detroitmi.gov. Effective March 2020, hard copies of payment packets should not be dropped off to the City of Detroit's Housing and Revitalization Department.

For questions related to the ESG payment process, please contact the City of Detroit at (313) 224-9974 or to your program manager directly.

Eligible Subrecipients

Private, nonprofit, tax-exempt organizations that plan to provide street outreach, emergency shelter, Rapid Re-Housing, and homelessness prevention services are eligible to apply for ESG funds. Applicants must be able to demonstrate that they have participated in an HMIS system for at least one full year or submit an action plan that has been approved by the CoC HMIS Lead showing how an agency will participate in HMIS at the start of the grant. For organizations serving victims of domestic violence, the City of Detroit may approve another comparable tracking client systems per HUD guidelines.

Subrecipient Requirements

All City of Detroit ESG subrecipients must:

- Record all client-related data and activity using the Continuum of Care (CoC) established HMIS.
- Participate in the Continuum of Care as defined as participating in CoC General Membership meetings and/or CoC Committees or Work Groups.

- Participate actively in the community-wide Coordinated Assessment Model (CAM).
- Provide services consistent with a Housing First and Low Barrier approach. (See Frequently Used Terms: Housing First for more information.)
- Provide a client grievance process that uploads and protects client's rights
- Comply with all requirements in their subrecipient agreements, federal requirements outlined in the ESG Interim Rule, and locally established written program standards.

Leadership & Management

The City of Detroit funded subrecipients' Board of Directors shall consist of voluntary (unpaid) members, with the possible exception of the agency's CEO or Director. Subrecipients must include on the board of directors, or some other policy-making entity, one or more members who are either homeless or formerly homeless to ensure alignment of services with needs.

Subrecipients' Board of Directors shall meet at least quarterly and set overall policy for the agency. Minutes of the meetings shall be maintained for a period of no less than five years. Subrecipients must have a secure storage space for confidential documents relating to clients and personnel. Subrecipients shall have a policy manual which includes the project's purpose, population served, regulations, rules, and procedures.

HUD Requirements

All projects must comply with the Fair Housing Act (including Equal Access and Family Separation), the Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity regulations, and the Americans with Disabilities Act regulations and must be reflected in their agency policies and procedures. Refer to the City of Detroit Homeless Programs Policy and Procedure Manual or the links provided in this document for more information. All providers should establish organizational policies to ensure that all federal laws are followed in the administration of ESG services.

Other HUD Requirements

All funded projects are expected to be familiar with and adhere to all HUD requirements including the CoC Program Interim Rule, applicable Notices, and CoC Program Notice of Funding Available (NOFA) (s) under which the project is funded. This includes, but is not limited to:

- Participant eligibility
- Prioritization
- Allowable activities and costs
- Site control
- Subsidy layering
- Environmental review
- Matching requirements
- Calculating occupancy charges and rent

- Limitations on transitional housing
- Term of commitment, repayment of grants, and prevention of undue benefits
- Displacement, relocation, and acquisition
- Timeliness standards
- Limitation on use of funds
- Limitation on use of grant funds to serve persons defined as homeless under other federal laws
- Termination of assistance to program participants
- Fair Housing and Equal Opportunity
- Conflicts of interest
- Program income
- Recordkeeping requirements
- Grant and project changes
- Other applicable federal requirements as outlined in the regulations

Match Requirements

Federal Requirements

As an ESG recipient, the City of Detroit is required to match its ESG fiscal year award amount with an equal amount of cash and/or in-kind contributions such as donated buildings, donated materials, or volunteer services. Sources of match funds include any federal source other than the ESG program as well as state, local, and private sources. If matching funds are from a federal source, Detroit must ensure the following:

- The laws governing the funds that will be used to match do not prohibit those funds from being used as ESG match funds.
- If ESG funds are used as a source of matching funds for another federal program, that federal program's funds cannot be used as a source of ESG match funds.

If funds (regardless of the source) were used to match a previous ESG grant, those funds cannot be used to meet the matching requirements of a subsequent ESG award.

Eligible types of matching funds are as follows:

- Cash contributions: Cash expended to pay for allowable costs incurred by the recipient or a subrecipient.
- Noncash contributions: The value of any real property, equipment, goods, or services contributed to the recipient's or subrecipient's ESG program, provided that if the recipient or subrecipient had to pay for them with grant funds, the costs would have been allowable. Noncash contributions may also include the purchase value of any donated building.
- Program income: Costs that are paid by program income, provided that they are eligible ESG costs and supplement the recipient's ESG program, can be counted towards the matching requirement.

When calculating the amount of noncash contributions, the following must be taken into consideration:

- To determine the value of any donated material, building, or lease, the recipient must use a method reasonably calculated to establish the fair market value.
- Services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work in the recipient's or subrecipient's organization. If the recipient or subrecipient does not have employees performing similar work, the rates must be consistent with those ordinarily paid by other employers for similar work in the same labor market.
- Some noncash contributions are real property, equipment, goods, or services that, if the recipient or subrecipient had to pay for them with grant funds, the payments would have been indirect costs. Matching credit for these contributions must be given only if the recipient or subrecipient has established, along with its regular indirect cost rate, a special rate for allocating to individual projects or programs the value of those contributions.

Subrecipient Requirements

The City of Detroit uses Community Development Block Grant (CDBG) funds to help subrecipients meet match requirements. CDBG awards in the corresponding program year can be used as match. Any ESG match requirement that exceeds the CDBG award must be supplied by the subrecipient. Subrecipients will be required to submit a Match Documentation Form (Appendix A) with their last ESG payment for the program year. This match must be expended on ESG-eligible activities. Matching sources may include cash contributions expended for allowable expenses and non-cash contributions including, but not limited to: the value of any real property, equipment, goods, or services committed to support ESG-eligible activities during the period of the ESG subrecipient agreement. (See the above Federal Requirements section for more information).

For more information about the matching requirement, see 24 CFR 576.201.

Documenting Match Requirements

The City of Detroit and all subrecipients must keep records of the source of funds used to satisfy the ESG matching requirement. The records must indicate the fiscal year grant for which the matching contribution is being used. The records must also show how the value of noncash contributions was calculated. Note that, to the extent possible, the calculation for volunteer services must use the same methods that the organization uses to determine regular personnel costs.

For more information about recordkeeping requirements, see 24 CFR 576.500.

Client Grievance Process

All households served by agencies within the Detroit Continuum of Care (CoC) have the right to file a complaint or grievance if they feel their rights have been violated by any program or agency within the Detroit homeless response system. Agencies are required to establish an internal client grievance process and to ensure it is available and accessible to clients. If a client is not satisfied with the agency's formal grievance process or fears retribution, the CoC has an established process.

The CoC Lead Agency, Homeless Action Network of Detroit (HAND), receives all claims and determines who funds the agency. HAND conducts an investigation for CoC related grievances. Claims related to shelter programs are investigated by the City of Detroit and/or the Emergency Shelter Program (ESP) Funder. Shelter grievances may also be elevated to the Michigan Department of Health and Human Services (MDHHS) if appropriate. All CoC-funded and ESG-funded grievances are then reviewed by the CoC Board Grievance Review Committee to determine an outcome. Grievance responses are given within 20 days of the Grievance Committee's decision. For more information regarding the CoC Grievance process please visit HAND's website, found here.

Contract Support & Oversight Process (non-monitoring)

Introduction

The City of Detroit Housing and Revitalization Department (HRD) is committed to continuous improvement to meet the needs of residents in a housing crisis as effectively as possible. Continuous improvement efforts are monitored and tailored in a number of ways, including subrecipient monitoring, oversight of programmatic expectations, collecting and tracking performance data, and responding to concerns and contract violations reported by various system partners. As a funder, the HRD has a duty to ensure agencies adhere to the required policies, procedures, and regulations outlined in their contract. This responsibility includes follow-up and corrective

measures regarding issues and contract violations to ensure quality services for all clients.

It is critical for agency leadership to be aware of violations so that they implement corrective action, thus strengthening their program and ensuring that clients are being treated with respect and dignity. To best address any issues and/or contract violations, HRD will be tracking incidents jointly with system partners. Repeat or critical violations will be escalated to HRD as outlined below. For City funded programs, substantiated contract violations may impact future funding applications and awards.

HRD understands that adequate staff training required to avoid contract violations can be a challenge. However, it is vital that agencies develop a robust training plan that meets the requirements outlined in the City of Detroit ESG Policy and Procedures Manual. It is our intention that these requirements are accessible therefore the City has developed training resources which should be used for staff onboarding and continuous education. If a contract violations occurs, HRD may address these issues by requiring additional training and/or targeted technical assistance, as needed. Our first response will be one of partnership and education, as serving households in crisis can be challenging. However, if contract violations continue to occur or are of a critical nature, corrective actions may be taken. For instance, per the contract, failure to meet requirements may result in additional monitoring, corrective action plan, and termination of the initial agreement, and/or the suspension, decrease or reallocation of future grant funds.

Violations

Violations are grouped into two reporting levels:

Level 1 are *Areas of Concern* that violate policies and procedures outlined in this document.

Example 1. Not adhering to code red or code blue response(s).

Example 2. Not allowing clients into shelter after CAM business hours.

Level 2 are *Regulatory Violations*

Example 3. Client discrimination based on race, religion, gender identity or sexual orientation.

Example 4. Violating clients' rights to privacy and confidentiality.

Notification and Tracking

Level 1 and 2 violations are reported in two ways. First, CAM as the front door of the system, has been tasked with tracking violations and sharing them with HRD. Second, agencies can submit notification to HRD about a Level 1 or 2 violation by emailing their program manager or completing a CoC Grievance.

Level 1- When a Level 1 violation occurs, CAM management will reach out to agency leadership within 48 hours. The agency should work to resolve the violation and put safeguards in place to make sure no further incidents occur. CAM will also track the

violation; if an agency has three or more Level 1 violations within 6 months, it will be elevated to a Level 2.

Level 2- Level 2 violations follow the same process as Level 1, but also include immediate elevation to the City of Detroit as these involve regulatory violations. Level 2 violations may also include an escalation to the CoC grievance committee directly.

Corrective Action

1. The City will communicate by email to agency leadership within 48 hours of receiving notification to discuss the incident, necessary training, and corrective measures.
2. Clients affected by the violation must be offered the opportunity by the agency to file an agency or CoC grievance. This service must be documented in HMIS. At no time can the agency retaliate against the client for filing a grievance.
3. If the issue has not been resolved, HRD may take one or both of the following actions:
    a) Require the agency to submit a written corrective action plan detailing how they will ensure future violations will not occur. The agency agrees to promptly remedy and correct any such reported deficiencies within **14-30 days of notification**, and obtain any technical or management assistance as required or needed to correct such deficiencies or substandard performance.
    b) The City performs a desk or on-site monitoring. Per contract, agencies agree to allow representative(s) of the City to make inspections for the purpose of ascertaining that the agency is properly performing the services set forth contractually. Inspections may be beneficial to gathering information to develop plans for improved performance.

4. If the above correction actions fail, or if there is failure to prepare and submit required measures, this may constitute a breach of performance and could lead to suspension and/or termination of the initial agreement.

Appeals and Grievances

If any agency feels that CAM or another agency recorded a violation in error, HRD encourages them to resolve the issue with the agency directly. If both parties agree that the violation was a mistake, it will be removed from the tracker. If a consensus cannot be reached, the above process will be followed.

All agencies participating in the CoC have the right to file a complaint or grievance if the agency has a complaint about the provision of services or housing or the operations of the Coordinated Entry System (CAM).A grievance can be filed when an agency feels it has been treated unjustly by the Coordinated Entry System (CAM) or by any program or agency within the homeless system by submitting the Agency Grievance Form.

Email: kaitie@handetroit.org

Mail:
Homeless Action Network of Detroit (HAND)
3701 Miracles Blvd, Suite 101
Detroit, MI 48201
*If this grievance is against HAND, it can be submitted directly to the CoC Board Chair, Amy Brown at abrown@noahprojectdetroit.org.
Written response to your grievance will be provided within 20 business days.

Section 3: Coordinated Entry Systems

Summary

Coordinated Entry is a centralized and streamlined system for accessing housing and support services to end homelessness in a community. Coordinated Entry is required by the U.S. Department of Housing and Urban Development (HUD) for all Continuums of Care (CoCs) as stated in 24 CFR 578.7 (a)(8) of the CoC Program Interim Rule. Detroit's Coordinated Entry System, the Coordinated Assessment Model (CAM), aims to work with households to understand their strengths and needs, complete a common assessment, and connect households with housing and homeless assistance (based on information gathered and on availability). ESG-funded and Community Development Block Grant (CDBG) Homeless Public Service programs are required to use the CoC's coordinated entry system, ESG-funded programs must work with the CoC to ensure that the CoC's coordinated entry system procedures and prioritization policies are consistent with the programs' written standards for providing ESG assistance (see Written Standards Requirements section below).

The details of these expectations are outlined below:

CAM Liaisons
Responsible for serving as point person between their respective agency and the CAM; some agencies appoint multiple CAM Liaisons, one for each program "type" the agency operates. Duties include, but are not limited to:

- Actively participate in applicable CAM sub-committee/workgroup meetings.
- Serve as primary point of contact for CAM and relay information learned through sub-committee meetings and other CAM Liaison communications to other staff at their agency.
- Communicate CAM-related concerns, issues, recommendations, and/or feedback from their agency to the appropriate CAM sub-committee.
- If interested, nominate themselves or other CAM Liaisons to serve as the one individual appointed from each sub-committee to the CAM Governance Committee.

All recipients and subrecipients of the CoC Program and ESG Program-funded projects must comply with the nondiscrimination and equal opportunity provisions of Federal civil rights law, including the following federal regulations: Fair Housing Act (including Equal Access and Family Separation), the Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity regulations, and the Americans with Disabilities Act regulations.

Prevention Provider

Responsible for providing prevention services. Duties include but are not limited to:

- Closely coordinating with CAM on activities, as outlined in the CAM Partnership MOU and the CAM Operations Manual, such as:
    - Swiftly respond to consumers referred to their agency, completing applicable HMIS duties.

Street Outreach & Navigation Providers

Reports to the City of Detroit. Responsible for providing street outreach and/or navigation services. Duties include but are not limited to:

- Closely coordinating with CAM on activities, as outlined in the CAM Partnership MOU and the CAM Operations Manual, such as:
    - Swiftly respond to consumers referred to their agency, complete applicable HMIS duties, facilitate access to RRH or PSH programs for consumers referred to these programs.

All individuals/households that are met by street outreach are offered the same standardized process as those who access the CAM through Access Points. If an individual/household is met by street outreach during Access Point operating hours, street outreach will accompany the individual/household to an Access Point to be assessed and referred to shelter, if shelter is available. If an individual/household is met by street outreach after Access Point operating hours and would like to enter shelter, then the street outreach staff member can transport the individual/household directly to a shelter for the night. The shelter will then ask the individual/household to go to the Access Point the following day to be assessed. Regardless of the time of day, if an unsheltered individual/household refuses to go to an Access Point and/or refuses shelter for any reason, street outreach should attempt to complete the standardized assessment tool (VI-SPDAT) with them. This will include reporting the individual(s) name, location, and assessment outcome to the CAM for ongoing consumer tracking.

Coordinated Assessment Model (CAM)

The primary method for accessing Emergency Shelter in the City of Detroit is the Coordinated Assessment Model (CAM). The CAM operates Access Points throughout the city that serve as points of entry for clients into the Emergency Shelter network. Information regarding CAM hours and locations can be found on the CAM website: www.camdetroit.org. CAM sites, or Access Points, are located to provide efficient referral to shelters in all areas of the city. All

clients who are referred to shelter will be provided with the "Client's Rights" handout (Appendix B) to ensure clients understand minimum shelter expectations and how to file a grievance if they believe they've been mistreated.

Making a CAM referral

100% of clients must be referred to CAM. It is the shelter's responsibility to connect the client to CAM within 48 hours if the CAM did not serve as the initial intake point. This is to ensure clients in shelter get access to housing services they may qualify for.

In the case of daily in/out shelters, clients are expected to have a current (completed by the CAM staff within the last six months) VI-SPDAT on file. CAM will request a list of current shelter residents quarterly to determine whether a SPDAT needs to be completed. For clients who do not have a current assessment, shelters are responsible for coordinating a connection to CAM to ensure a linkage to services.

Shelters must provide an accurate daily bed count to the CAM to enable efficient placement of clients presenting at the Access Points that cannot be diverted from the shelter system. Daily bed count data must be provided to the CAM via email or phone by 9 A.M. daily.

Shelter beds for which CAM has made a referral shall be held until 9pm. After 9pm, referrals are no longer honored and beds are distributed on a first-come, first-serve basis.

Clients who are temporarily or permanently banned from the facility must be entered into HMIS by the shelter within 24 hours of the ban being issued to the client. Failure to update client status including suspensions and bans may result in the CAM system referring "banned" individuals back to the agency that banned them.

Households seeking Emergency Shelter should be advised as follows in the chart below:

NEW

Requesting a VI-SPDAT or Full SPDAT Re-assessment

Shelter and Street Outreach staff are able to request a new VI-SPDAT or Full SPDAT assessment for a client if they believe that the VI-SPDAT or Full SPDAT score does not reflect the client's current situation.

1. Staff requesting a new VI or Full SPDAT should complete the ""Request for SPDAT Reassessment" form.
    a. Include detailed information on what has changed or was not discussed at the time of the original VI or Full SPDAT
    b. Fill out each section of the form or it will be rejected. If you do not have the information, please put N/A or Unknown.
2. CAM staff will review the submitted request and any supporting documents provided to a make a determination within 3 business days of submission.
3. Once the determination is made, CAM will notify the requesting staff of the outcome via email and attach the request form with comments.

4. If the reassessment is approved, CAM will assign an Intake Specialist to reassess the client.
5. CAM staff will notify the submitting staff of the outcome.

Detroit CAM Emergency Shelter Access Process			
	Hours of Operation		
	During CAM Operating Hours	After hours/ weekends/holidays	Street Outreach
Method of accessing Emergency Shelter	Household connects with CAM in person at a CAM Access Point OR through the CAM access line (if operational) Access Points hours and locations can be found at: www.camdetroit.org	Household presents directly to Emergency Shelter. Emergency Shelter staff assists household with shelter placement. Client is referred to CAM Access Point for intake within 48 hours of shelter request.	Street Outreach team conducts CAM intake, documentation, and shelter/warming center referral. Street Outreach team assists with shelter placement and transportation.

CAM Coordination Expectations

Shelter providers and the Coordinated Assessment entity share the goal of linking families and individuals with housing as quickly and effectively as possible. Therefore, shelter case management staff should coordinate with the CAM navigators to connect persons experiencing a housing crisis with the resources and community services they need. This coordination will help the client to secure safe housing as quickly as possible and will increase the likelihood of successful housing retention. In cases where CAM staff are unable to work directly with persons experiencing a housing crisis, Detroit Emergency Shelter staff will provide the case management, support, and linkage to community resources to assist households.

CAM Coordination Related to Housing Choice Vouchers (HCV)

Current community policy states that all households scoring 6-7 (singles) or 6-8 (families) on the VI-SPDAT complete a Housing Choice Voucher (HCV) pre-application with a CAM staff after entering shelter. The CAM and shelter providers share responsibility for:

1. Recertifying clients' homelessness eligibility at 90-120 day intervals
2. Communicating to clients when they have been taken off the waitlist and can receive a voucher.

The specific expected process for communicating general HCV information and HCV waitlist status to clients' is as follows:

1. Each shelter is required to designate an HCV point of contact and share this contact information with the CAM and other shelter providers.
2. The HCV point of contact is responsible for recertifying clients who remain in their shelter at each recertification interval.
3. Upon HCV pull, staff from the CAM lead agency will review names that are pulled. CAM staff will create a spreadsheet that includes client name and HMIS number as well as the shelter they are currently residing at (according to HMIS) IF that household has not yet transitioned to Rapid Re-Housing. This information will make it easier to review the list to determine the status of the households at each shelter at the time of referral. All communication must be sent securely to protect client's information.
4. Upon receipt of the list of tenants pulled off the HCV waitlist, if the household is currently in that organization's shelter, they should inform that client of the HCV pull and details of the briefing, required documents, etc.
5. If the household is currently in a different shelter, the HCV point of contact will notify the HCV point of contact at that other shelter that the household has been pulled off the HCV waitlist via email.
6. At minimum, shelters should be aware of the required documents and steps needed in the HCV application process so that they can support households as they seek to lease up.

For more information regarding HCV processes and provider responsibilities, please refer to the HCV Policy and Procedures manual found here.

Rapid Re-Housing (RRH) Providers

Report to HUD, CoC Lead Agency, and the City of Detroit, depending on funding. Responsible for providing Rapid Re-Housing activities. Duties include but are not limited to:

- Closely coordinating what with CAM on activities, as outlined in the CAM Partnership MOU and the CAM Operations Manual, such as:
  - Acquiring accurate program vacancies, streamlining eligibility/screening criteria, providing feedback on referrals that are rejected, completing applicable HMIS duties.
  - Swiftly respond to consumers referred to their agencies for RRH.

Written Standards Requirements

The City of Detroit has drafted and implemented street outreach, emergency shelter, and homeless prevention written standards outlined throughout this manual. This ESG Policies and Procedures Manual encompasses and expands upon the spirit of the Detroit CoC Homeless System written standards posted on the Homeless Action Network of Detroit (HAND) website.

Section 4: Principles of Best Practice

Summary

Best Practices are methods, techniques, and regulations proven to provide fair and equal service practices. The City of Detroit is committed to utilizing the following best practices which include HUD regulations and service practice method that support in the development and management of ESG-funded programs designed to reach historically vulnerable and underserved persons. City of Detroit ESG- funded programs are required to implement and will be monitored for compliance on the following best practices.

Equal Access to Housing Regardless of Sexual Orientation or Gender Identity

ESG recipients and subrecipients are required to follow the regulations in the Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs final rule, published in the Federal Register on September 21, 2016. This rule ensures equal access to programs and shelters funded by HUD's Office of Community Planning and Development (CPD). Additionally, this rule builds on the Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity final rule, published in the Federal Register on February 3, 2012. This rule requires recipients and subrecipients of CPD funding to grant equal access to their program facilities, accommodations, and services in accordance with the individual's gender identity and in a way that creates equal access to the individual's family.

ESG-funded programs must establish policies and procedures for program admissions, occupancy, and participant privacy and security that align with the requirements established in the Equal Access rules, including the following:

- Make housing available without regard to actual or perceived sexual orientation, gender identity, or marital status.

- Grant equal access to facilities, buildings, benefits, accommodations, and services to individuals in accordance with the individual's gender identity, and in a manner that affords equal access to the individual's family.
- Prohibit any requirements for individuals to prove gender identity (including documentation, ID, etc.). This prohibition also applies to intrusive questioning, including questions about a person's anatomy or medical history.
- Prohibit consideration of a client or potential client's entry into a program because their appearance or behavior does not conform to gender stereotypes.
- Prohibit any segregation of transgender clients (e.g., transgender-only shelter or space). However, if a transgender client requests an accommodation (like a more private space) and the facility can accommodate the request, this is acceptable;
- Base discharges, service restrictions, and warnings following any incidents involving transgender clients only on the individual's behavior, not gender identity.
- Have a zero tolerance for harassment of transgender residents. Staff shall recognize that harassment based on gender identity is discriminatory behavior and will be treated as such. All unacceptable behavior against transgender residents will be dealt with based on the program's behavior policies. Due to the high incidence of harassment of transgender people, concerns about the safety of a transgender resident will be taken with utmost seriousness. Unacceptable behavior can include harassment, abuse, assault, discrimination, intimidation, threats, violence, and many other forms.
- Permit any clients expressing concern to use bathrooms and dressing areas at a separate time from others in the facility.
- Work (to the extent feasible) with the layout of any shelter facilities to provide for privacy in bathrooms and dressing areas (ESG funds may be used to renovate an emergency shelter to maximize privacy and safety).
- Ensure that policies do not isolate or segregate clients based upon gender identity;
- Take reasonable steps to address any safety or privacy concerns expressed by clients. This may include:
    - Responding to the requests of the client expressing concern through the addition of a privacy partition or curtain.
    - Providing clients the use of a nearby private restroom or office.
    - Providing clients a separate changing schedule.
- Provide all staff (full-time, part-time, and volunteer) and contractors with ongoing training about the program's policies and the needs, concerns, and realities of transgender people seeking services.

Best practices suggest that where the provider is uncertain of the client's sex or gender identity, the provider simply informs the client or potential client that the agency provides shelter based on the gender with which the individual identifies.

The following resources provides more information about implementing the Equal Access Rule:

HUD Exchange LGBT Homelessness Page

Equal Access for Transgender People: Supporting Inclusive Housing and Shelters

All emergency shelters receiving HUD funding are required by federal law to adhere to HUD's Equal Access Rule. The Equal Access Rule provides protection for any person or family seeking emergency shelter and removed barriers to access based on gender identity and family composition. No exceptions will be made to the requirements under the law. The City of Detroit stands firmly that all persons requesting shelter and utilizing shelter services are treated with the utmost respect and dignity. Discrimination of any kind will not be tolerated within the Detroit Homeless Service System.

Reasonable Accommodations/Modifications

A reasonable accommodation is a change in rules, policies, or procedures to help people with disabilities access housing or housing-related services.

- For example, a rental office that generally provides standard, printed rental applications could, as a reasonable accommodation to a person with a visual disability, provide a Braille version of the application or provide assistance in filling it out.
- Fair housing laws require housing and shelter providers to consider requests for accommodations by applicants, residents, and, in some limited instances, former residents.
- Housing providers cannot charge money for providing a reasonable accommodation.
- There is no limit to the number of reasonable accommodation requests a person with a disability may make.
- However, if providing the requested accommodation would pose an undue financial or administrative burden on the shelter or housing provider, or if it would fundamentally alter the nature of the program, the request is not "reasonable" and does not need to be granted.

If a prospective client household has requested a reasonable accommodation or modification, an Emergency Shelter provider may ask for verification of the disability and may also request assurances from the person's healthcare worker or case manager.

A request for a reasonable accommodation should be granted if the following conditions are met:

- The person requesting the accommodation has a disability as defined by fair housing laws.
- The requested accommodation is necessary to afford the person an equal opportunity to use and enjoy the dwelling and related services.
- Complying with the request poses neither an undue administrative nor financial burden on the housing provider or program.
- Complying with the request will not fundamentally alter the nature of the program.

Americans with Disabilities Act (ADA) Compliance

The City of Detroit requires all ESG-funded shelters to comply with the following ADA regulations.

- The ADA and Section 504 both stipulate that "no otherwise qualified person with disabilities shall, solely by reason of his or her disability, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance. The Fair Housing Amendments Act regulations state "it shall be unlawful for any person to refuse to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford a person with a disability equal opportunity to use and enjoy a dwelling unit including public and private use areas."
- In cases where an emergency shelter location rotates based on availability of space and the new shelter location cannot accommodate a person's disability, the emergency shelter is responsible for locating and assisting in the transfer of the person in housing crisis to a new and accessible emergency shelter facility. Under no circumstance will any person be denied emergency shelter based on a building's inability to comply with ADA standards or its inability to provide physical accommodations. Emergency shelters who operate with City of Detroit funding and who rotate facilities based on availability or schedules must include written policies and procedures on relocating and securing shelter options when a new site cannot accommodate a person with a disability.

Low-Barrier

Low-barrier is a term used to describe a service or provider that makes help as easily accessible and user friendly as possible. A low-barrier approach is one that tries to minimize barriers such as paperwork, waiting lists, eligibility requirements, as well as physical and staff related characteristics that can stand in the way of people getting their needs met. It is an entry point for a variety of services and approaches.

What does it look like in action?

- Place: The doors and space are open and accessible.
- Presentation: The people are open, friendly, engaging, making everyone feel welcome and tuning in to different people's needs and styles.
- Practice: Start where consumers present; accept challenging behavior; use assessment skills to build on strengths and develop plans. Maintain an inclusive approach to the work.

What it is not:

- A service model in and of itself
- A specific social work approach
- An outcome or a program goal
- A simple way of measuring a program's success
- A "no barrier" or "no rules" or "no expectations" approach to social work

Federal Fair Housing Act

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and disability. For additional information, please see the HUD page on the Fair Housing Act.

Termination of Assistance

It is important that providers effectively communicate termination and grievance procedures to participants and ensure that the procedures are fully understood. Posting the policy on a bulletin board in a common area within the facility is an effective way to ensure that the termination and grievance procedures are available for participants to access at any time. Additionally, all City of Detroit/CoC-funded agencies must include termination policies and procedures in their agency regulations and manuals that meet the guidelines outlined in this section. If a participant violates ESG program requirements, the subrecipient may terminate assistance in accordance with a formal process established by the subrecipient that recognizes the rights of individuals affected. The subrecipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases.

The process must recognize the rights of the individuals affected and subrecipients must exercise judgment and examine all extenuating circumstances when determining which violations warrant termination. Assistance should only be terminated in the most severe cases.

For information detailing client termination from a specific program component (e.g., Emergency Shelter, RRH, etc.) please refer to that program component section.

Client Confidentiality and Privacy Policies

Subrecipients must have policies and procedures established in writing to ensure that the privacy and confidentiality of all ESG-funded program participants is protected. The ESG interim rule specifically requires that the written procedures ensure the following:

- All records containing personally identifying information (as defined in HUD's standards for participation, data collection, and reporting in a local HMIS) of any individual or family who applies for and/or receives ESG assistance will be kept secure and confidential.
- The address or general location of a domestic violence, dating violence, sexual assault, or stalking shelter funded through ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter.

- The address and location of any housing of a program participant will not be made public, except as provided under a pre-existing privacy policy of the recipient or subrecipient and consistent with state and local laws regarding privacy and obligations of confidentiality.

Subrecipients must also ensure that confidentiality and privacy policies meet the specific confidentiality and security requirements for HMIS data which are described in the HMIS Data and Technical Standards.

It is recommended that policies and procedures include the following, at a minimum:

- Description of how participant files are to be stored and kept secure (e.g., locked files) and who has access to them.
- Assurance that participant files will not be removed from the program premises (or conditions in which this would be permitted).
- Process for obtaining written, informed consent to release participant information to an outside person/agency.
- Description of participant rights to: access their records; request updates to their records; request changes to information in their records with which they do not agree; and file a complaint if they feel their confidentiality has been breached.
- Provisions for training staff on privacy and confidentiality procedures. Training should include the following points:
    - Sharing participant information with other program staff should be limited only to staff directly involved with delivering services to the participant, should only include the information necessary for service delivery, and should occur only using secure methods or in private spaces.
    - Prohibition against sharing any private account information (e.g., usernames, passwords, etc.).
    - Disciplinary action that will result from failing to follow the established privacy and confidentiality policies.

Please note that client confidentiality also applies to City of Detroit and HUD on behalf of the funded program. Any information obtained by City of Detroit and/or HUD staff, as part of a performance review, will be held in the strictest confidence. City of Detroit and/or HUD staff will not include client Personally Identifiable Information (PII) in review working papers or in performance review reports. Additionally, if the City of Detroit or HUD staff asks for client files related to a performance/ monitoring review, then the agency must redact all Personal Identifiable Information (PPI) from any files that are being sent by mail or electronically, unless a secure, encrypted method can be used for electronic transmission.

Homeless Management Information Systems (HMIS) Requirements

All subrecipients are required to use the City of Detroit Homeless Management Information System (HMIS). If a subrecipient is a victim services provider or legal services provider, it may use a comparable database that collects client-level data over time and generates

unduplicated aggregate reports based on the data. Information that is entered into a comparable database must not be entered directly into or provided to an HMIS.

As a best practice, all participant data should be entered as close to real-time as possible to ensure accuracy of reported data. The City of Detroit data standards require all data to be entered within 48 hours of entry or exit. The only exception to the 48-hour rule is that shelter providers who have frequent entries and exits (nightly in/out shelters) should not enter and exit clients daily. Instead, those facilities should track clients' attendance over the course of a month (i.e., enter nights the client stayed in shelter on a monthly basis).

All subrecipients are required to report HMIS Universal data elements as well as certain HMIS program-specific data elements for each program participant (including all participants within a family/household). HMIS users should search for participants in HMIS first prior to creating a new client record. Please reference the Detroit CoC HMIS Policies and Procedures, the HMIS Data Standards, and the ESG Program HMIS Manual for additional information about HMIS data collection requirements.

Section 5: Overview of ESG Program Components

Summary

ESG funds may be used for five program components: Street Outreach, Emergency Shelter, Homelessness Prevention, Rapid Re-Housing assistance, and HMIS; as well as administrative activities. The following summary presents the essential aspects of each component.

Program Components

Street Outreach refers to the activity of providing essential services necessary to reach out to unsheltered persons; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered persons who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. The term ''unsheltered person'' is defined as:

1. An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: 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.

Emergency Shelter means any facility for which the primary purpose is to provide a temporary shelter for persons experiencing homelessness in general or for specific populations of persons experiencing homelessness and which does not require occupants to sign leases or occupancy agreements.

There are three primary components that ESG funds can be used on for emergency shelters:

- Renovation/Rehabilitation of buildings to be used as an emergency shelter for individuals and families experiencing homelessness
- Shelter operations
- Providing a range of essential services to shelter residents

Homelessness Prevention refers to activities designed to keep households that are at-risk of losing their housing from becoming homeless. Homelessness prevention services include housing relocation and stabilization services and/or 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 "category one" (literally homeless) of the homeless definition. It is most efficiently implemented when targeted to those at greatest risk of losing housing.

Rapid Re-Housing refers to activities designed to assist households that are literally homeless to move to permanent housing in the community as quickly as possible and achieve stability in that housing.

Rapid Re-Housing programs are designed to help those who are homeless transition into permanent housing. The primary goal is to stabilize a program participant in permanent housing as quickly as possible and to provide wrap-around services after the family or individual obtains housing. The program is designed for those who meet the criteria under category 1 and 4 of the homeless definition.

Rapid Re-Housing services include 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.

A **Homeless Management Information System (HMIS**) is the information system designated by the Continuum of Care to comply with the HUD's data collection, management, and reporting standards. HMIS is used to collect client level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness. The recipient or subrecipient may use ESG funds (up to 2% of the grant award) to pay the costs of contributing data to the HMIS designated by the Continuum of Care for the area. The City of Detroit allows subrecipients to ask for up to 2% of their total grant award for HMIS related expenses.

If a subrecipient is a victim services provider or a legal services provider, then it may use ESG funds to establish and operate a comparable database that collects client-level data over time (i.e., longitudinal data) and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must not be entered directly into or provided to an HMIS. It is CRITICAL that recipients confirm with their comparable database provider that it can generate and export data in CSV format that generates aggregate data on clients served. Details on HUD's CoC and ESG CAPER HMIS Programming Specifications should be provided to them so that quarterly accomplishment reports and year-end CAPER reports can be generated in the required format for successful upload into Sage.

Section 6: Outreach and Housing Navigation

Summary

Outreach and Housing Navigation provides a vital link for persons living on the streets to services designed to assist in ending episodes of homelessness. Outreach and Housing Navigation are essential services necessary to reach out to unsheltered persons; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered persons who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. 24 CFR 576.101

Guidelines for Outreach and Housing Navigation Best Practice

Outreach should be utilized as a powerful tool as part of a full continuum of services towards moving individuals and families who are literally homeless from the streets and into stable, permanent housing. It should not be used as a program that seeks to alleviate the burden of living on the streets or provide support to people as a replacement to providing them with independent, stable housing.

The City of Detroit recognizes that Outreach and Housing Navigation teams may use incentives to encourage trust and build relationships or to ensure that homeless households' emergency needs are met. However, this is not an eligible activity for reimbursement, and should never be the principal activity (e.g., a feeding program that provides sandwiches as its main goal).

Where one or more outreach and/or navigation teams work in the same area, the City of Detroit expects that agencies collaborate to provide complimentary services by ensuring the following:

1. A lead case manager/navigator is established through the By-Name List process.
2. The agency will lead the case management of the homeless individual until either the individual has been housed, or a more appropriate case manager is ready to take over.
3. Other agencies will reinforce this intervention so that agencies are not working against one another.

Severe Weather Situations

Severe Weather are emergency situations in which the City of Detroit may ask outreach providers to extend hours (see Appendix F).

Code Blue- A weather emergency notice is issued when:

- The temperature drops to **20 degrees Fahrenheit or below,** including National Weather Service calculations for wind chill values between the hours of 4pm and 8am; and/or
- **Ice storms** or **freezing rain** is expected; and/or
- 6 or more inches of **snow** is expected

Code Red- A weather emergency notice is issued when:

- A heat index of **105 degrees** is predicted for two hours or more by the National Weather Service

Outreach and Housing Navigation Components

The City funds two different service components under Outreach and Housing Navigation, Street Outreach and Navigation, which are expected to be compliant with the eligible activities listed below. Each service has its own specific components and performance goals.

Street Outreach Component

Services are provided in the streets with a majority of the services provided outside of normal business hours. The goal of Street Outreach is primarily engagement in order to develop relationships with unsheltered individuals and connect them with resources including shelter or shelter access points, substance abuse or mental health treatment, and/or mainstream benefits. Outreach teams must demonstrate active participation in the chronic by-name-list process and be proactive in coordinating with the Neighborhood Police Officers in the areas of service. Outreach teams must coordinate with agencies funded under the Navigation service component as well as CAM. To meet the need, the City will negotiate hours of operation for the programs, but applicants should plan that at least 50% of the team's regular operations must be outside of normal business hours (between 5pm and 8am). Applicants are expected to mobilize a code blue response during extreme cold conditions defined above.

Navigation Component:

Services are provided to individuals and families identified through the chronic By Name List (BNL) process. Navigation teams provide case management services to work with unsheltered households to get them "document ready" and move them into permanent housing. *Document ready* is defined as assisting clients with obtaining all documentation needed for permanent housing. This may require working with households on the streets or in drop in centers. Agencies funded under Navigation must coordinate with teams funded under the Outreach Service component as well as CAM.

Performance Benchmarks

These benchmarks are expectations of Outreach and Housing Navigation providers and will be integrated into ongoing programmatic monitoring:

Street Outreach:

- 100% of clients will meet the definition of unsheltered;
- Percentage of clients who complete all CAM required assessments; and
- Percentage of clients who exit to any sheltered destination (excluding jail/prison, hospitals, or residential project/halfway house)

Navigation:

- 100% of clients will meet the definition of unsheltered;·
- Percentage of client who become "document ready"; and
- Percentage of clients exit to a permanent housing destination.

Outreach and Housing Navigation Eligible Activities

HUD's ESG Program allows for 6 eligible activities under Street Outreach: Engagement, Case Management, Emergency Health Services, Emergency Mental Health Services, Transportation and Services for Special Populations. However, the City of Detroit anticipates focusing the bulk of every street outreach award on engagement, case management, and transportation.

Subrecipients anticipating using funds on the other eligible activities must forward a model of practice to the City of Detroit for review, discussion, and approval before beginning work.

Per the ESG Interim Rule the six eligible activities are:

Engagement

The costs of activities to locate, identify, and build relationships with unsheltered persons and engage them for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs. These activities consist of making an initial assessment of needs and eligibility; providing crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; and actively connecting and providing information and referrals to programs targeted to persons experiencing homelessness and mainstream social services and housing
programs, including emergency shelter, transitional housing, community-based services, permanent supportive housing, and Rapid Re-Housing programs. Eligible costs include the cell phone costs of outreach workers during the performance of these activities.

Case Management

The cost of assessing housing and service needs, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant. Eligible services and activities include: using the centralized or coordinated assessment system as required under 24 CFR 576.400(d); conducting the initial evaluation required under 24 CFR 576.401(a), including verifying and documenting eligibility; counseling; developing, securing and coordinating services; obtaining Federal, State, and local benefits; monitoring and evaluating program participant progress; providing information and referrals to other providers; and developing an individualized housing and service plan, including planning a path to permanent housing stability.

Emergency Health Services

Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals operating in community-based settings, including streets, parks, and other places where unsheltered persons are living. ESG funds may be used only for these services to the extent that other appropriate health services are inaccessible or unavailable within the area.

Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate emergency medical treatment; and providing medication and follow-up services.

Emergency Mental Health Services

Eligible costs are for the direct outpatient treatment by licensed professionals of mental health conditions operating in community-based settings, including streets, parks, and other places where unsheltered people are living. ESG funds may be used only for these services to the extent that other appropriate mental health services are inaccessible or unavailable within the community.

Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual / family functioning or circumstances.
Eligible treatment consists of crisis interventions, the prescription of psychotropic medications, explanation about the use and management of medications, and combinations of therapeutic approaches to address multiple problems.

Transportation

The transportation costs of travel by outreach workers, social workers, medical professionals, or other service providers are eligible, provided that this travel takes place during the provision of services eligible under this section. The costs of transporting unsheltered people to emergency shelters or other service facilities are also eligible. These costs include the following:

1. The cost of a program participant's travel on public transportation.
2. Mileage allowance for service workers to visit program participants, if service workers use their own vehicles.
3. The cost of purchasing or leasing a vehicle for the recipient or subrecipient in which staff transports program participants and/or staff serving program participants. The cost of gas, insurance, taxes, and maintenance for the vehicle.
4. The cost of subrecipient staff time to accompany or assist program participants to use public transportation.

Services for Special Populations

ESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under paragraphs (a)(1) through (a)(5) of this section. The term *victim services* means services that assist program participants who are victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking.

While all the activities listed above are allowable under HUD regulations, the City of Detroit's primary focus is engagement and case management to link unsheltered households with shelter, permanent housing, and other services.

Outreach and Housing Navigation Client Files

General Program Documentation

Every client who has received a direct service from an ESG subrecipient must have a client file that documents the reason(s) for the assistance. Each file must include the following documentation:

- An assessment by either project staff or Coordinated Assessment Model (CAM) staff
- Signed HMIS Release(s) (for all adult members of the household)
- Verifications of Homelessness or At Risk of Homelessness that align to the project with which they are involved (e.g., third-party certification or self-declaration, plus backup documentation)
- Initial Consultation Form
- Case Notes (minimum of monthly case notes for clients receiving case management services)
- Individualized Housing and Service Plan
- Income Verification, including backup documentation (paystubs, third party verifications, etc.)
- As applicable, determinations of ineligibility (e.g., if a client requests ESG services and is deemed ineligible or declines services, a written explanation of why the client was ineligible or declined services, along with any rights of appeal the client may have).

Other Documentation

Documentation of compliance with the applicable requirements for providing service and assistance (24 CFR 576.101) includes:

- Engagement Documentation: Initial assessment of needs and eligibility; providing crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; and actively connecting and providing information and referrals to programs targeted to persons experiencing homelessness and mainstream social services and housing programs, including emergency shelter, transitional housing, community-based services, permanent supportive housing, and rapid-re housing programs.
- Case Management Documentation: Document eligibility; counseling; developing, securing and coordinating services; obtaining federal, state, and local benefits; monitoring and evaluating program participant progress; providing information and referrals to other providers; and developing an individualized housing and service plan, including planning a path to permanent housing stability.
- Emergency Health Services: Documentation of direct outpatient services provided.
- Emergency Mental Health Services: Documentation of direct outpatient services provided.

- Transportation documentation:
  - Cost of transporting unsheltered people to emergency shelters or other service facilities.
  - Cost of program participant's travel on public transportation.

Expectations for Outreach Staff Training

In order to ensure high quality services for those in Street Outreach and Navigation programs, agencies administering these programs within the City of Detroit will create a process to train new staff and review with current staff compliance on the following topics:

- HUD Regulatory Requirements
- ESG Regulatory Requirements
- Housing First
- Fair Housing/Equal Access/Housing Law
- Safety Protocol
- CPR/First Aid
- Client's Rights/Grievance Process
- Trauma Informed Care

During the monitoring process, organizations will be asked to provide the details of their annual staff training policy and protocol as well as information on the on-boarding process for new employees.

The Housing and Revitalization department has compiled a list of free training materials on some of the topics listed above. This training resource can be found here, using password: housing. This resource also include posttests that should be completed and kept in staff's file for auditing purposes. In addition, we strongly encourage organizations to utilize all available training provided including training through the Detroit Continuum of Care, the State of Michigan, and other training initiatives.

Section 7: Emergency Shelter

Summary

Emergency shelter means any facility, the primary purpose of which is to provide a temporary shelter for persons experiencing homelessness in general or for specific populations of persons experiencing homelessness and which does not require occupants to sign leases or occupancy agreements. ESG may be used to operate the shelter or to provide a range of essential services to the residents. Temporary hotel and motel stays are also permitted under this component if no appropriate emergency shelter is available for a homeless individual or family. 24 CFR 576.102

Goals of Emergency Shelter

- *Provide safety and shelter to households with no other place to go.*
- *Limit shelter stays to the shortest time necessary to help participants regain permanent housing.*
- *Maintain low-barrier admission criteria and high thresholds for expulsion.*
- *Ensure the coordination and/or provision of services to all persons seeking or utilizing shelter to ensure their housing crises are both rare and brief.*
- *Remain closely linked to an array of programs in order to accomplish this goal of stable permanent housing including, but not limited to: HCV Rapid Re-Housing, transitional housing, affordable housing placement, and employment.*
- *Link persons in housing crisis to applicable resources such as VA, SOAR, food stamps, TANF, housing, medical, mental health, employment, education, and financial assistance as appropriate.*

Eligible Emergency Shelter Activities

- Providing **essential services** to homeless families and individuals in emergency shelters.
- **Renovating** buildings to be used as emergency shelter for homeless families and individuals.
- **Operating** emergency shelters.
- Implementing assistance under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA).

Shelter Provider Expectations

The City of Detroit expects that all emergency shelter providers adhere to a standard of ethics and practices that ensure all persons in housing crisis are treated with dignity and respect. All City of Detroit funded emergency shelter programs will be required to incorporate the following practices into their policies and procedures:

- All persons in housing crisis should be treated with dignity and respect.
- All households will be treated fairly and will have all rules implemented consistently.
- No persons seeking shelter should face discrimination based on race, religion, ethnicity, national origin, sexual orientation, gender identity, age, political beliefs, disability, or family composition.
- All persons in housing crisis have the right to safe shelter, adequate food, and sanitary conditions.
- All households utilizing the emergency shelter system have the right to privacy and confidentiality.
- All households utilizing the emergency shelter system have the right to make their own choices, and those choices should be respected. It is the role of emergency shelter staff to assist households to identify possible consequences of those choices.
- All households utilizing the emergency shelter system are to be treated with warmth and friendliness to decrease alienation and despair, and to increase their chances of obtaining the services they need.
- All households in housing crisis have access and assistance in obtaining community supports to end their housing crisis, including: case management, medical and mental health, financial, legal, education, and employment services.

Low-Barrier Shelter Expectations

Low-barrier services and housing place a minimum number of expectations on people requesting assistance. The aim is to have as few barriers as possible to allow more people access to services. This model often means that program participants are not expected to abstain from using alcohol or other drugs, or from carrying on with street activities while engaging in services or living on-site, so long as they do not engage in these activities in common areas and are respectful of other tenants and staff. Low-barrier facilities follow a harm reduction philosophy.

For more information on how to successfully implement a low-barrier shelter model, please refer to the Interagency Council on Homelessness, "Key consideration for implementing Emergency Shelter Within an Effective Crisis Response System."

[1] https://endhomelessness.org/esls-template/keys-to-emergency-shelter-naeh/

Performance Benchmarks

These benchmarks are expectations of shelter providers and will be integrated into ongoing programmatic monitoring:

- 100% of clients must be screened by CAM. It is the shelter's responsibility to connect the client to CAM within 48 hours if the shelter served as the initial point of entry;
- Shelter utilization must be at 90% according to the CoC APR;
- Percentage of exits to a permanent housing destination meets the required performance benchmark for the funding year

Benchmarks the Continuum of Care will be measuring to create future performance expectations:

- Percentage of clients exit to permanent housing destinations in 30, 90, 180 days
- Average length of stay in shelter

Expectations for Shelter Staff Training

In order to ensure high quality services for those in Emergency Shelter, agencies administering shelter programs within the City of Detroit will create a process to train new staff and review with current staff compliance on the following topics:

- HUD Regulatory Requirements
- ESG Regulatory Requirements
- Housing First
- Fair Housing/Equal Access/Housing Law
- Safety Protocol
- CPR/First Aid
- Shelter Residents Rights (Appendix B)
- Client's Rights/Grievance Process
- Trauma Informed Care
- Equal Access

During the monitoring process, organizations will be asked to provide the details of their annual staff training policy and protocol as well as information on the on-boarding process for new employees.

The Housing and Revitalization department has compiled a list of free training materials on some of the topics listed above. This training resource can be found here, using password: housing. This resource also include posttests that should be completed and kept in staff's file for auditing purposes. In addition, we strongly encourage organizations to utilize all available training provided including training through the Detroit Continuum of Care, the State of Michigan, and other training initiatives.

Involuntary Family Separation

HUD issued regulations that prohibit all shelters from denying access to families based on the age of a child. This requirement has been issued through the HEARTH Act and through the ESG Interim Rule. All City of Detroit and CoC-funded emergency shelters and transitional housing facilities will comply with this requirement and have policies and procedures that reflect this. Non-compliance may result in removal of ESG/CoC funds. Please see the following HEARTH Act language on family separation:

- **SEC. 404. PREVENTING INVOLUNTARY FAMILY SEPARATION**. '(a) IN GENERAL.—… any project sponsor receiving funds under this title to provide emergency shelter, transitional housing, or permanent housing to families with children under age 18 shall not deny admission to any family based on the age of any child under age 18.)
- EXCEPTION: Notwithstanding the requirement under subsection (a), project sponsors of transitional housing receiving funds under this title may target transitional housing resources to families with children of a specific age only if the project sponsor:
  - Operates a transitional housing program that has a primary purpose of implementing an evidence-based practice that requires that housing units be targeted to families with children in a specific age group.
  - Provides such assurances, as the Secretary shall require, that an equivalent appropriate alternative living arrangement for the whole family or household unit has been secured.

ESG Interim Rule language on family separation:

- **(b) Prohibition against involuntary family separation**. The age, of a child under age 18 must not be used as a basis for denying any family's admission to an emergency shelter that uses Emergency Solutions Grant (ESG) funding or services and provides shelter to families with children under age 18.

Types of Emergency Shelters

Single-Sex Shelters

Single-sex shelters can only be operated using HUD funds under the following limited conditions:

- The shelter must serve individuals only. A shelter that accepts families with children cannot be a single-sex facility; and
- The shelter must be considered a "dwelling unit" and must be a single shelter that includes shared bedrooms or bathing facilities. See the CoC interim rule (which applies to ESG programs), section 578.93, for more information about this policy.

If an ESG-funded facility does not meet the conditions outlined above, then it cannot operate as a single-sex shelter and must serve eligible people of any gender.

Warming Centers

In Detroit, Warming Centers operate between November and March as a way to expand shelter capacity at times where those experiencing homelessness are at greater risk in unsheltered situations. Shelter policies and procedures that differ for Warming Centers will be clearly defined in this manual. If they are not, the same expectations exist for both types of facility.

Family Shelter

Any shelter that accepts families with children or couples presenting as family. Families and couples do NOT have to provide proof of marriage as a condition of shelter eligibility as outlined under HUD's Equal Access Rule. See *the Definition of Family* above in this Manual for a detailed explanation of family composition.

As there is significant variation between shelter models funded by the City of Detroit, as of the date of this publication, shelters must identify as one of the following:

1. **Emergency shelter** - Low-demand shelter designed to provide refuge from the street, typically overnight. Includes two CoC program models: emergency shelter (for adults) and youth low-threshold overnight shelter (for ages 18-24).
2. **Interim shelter** - Short-term program focused on re-housing with 24/7 access. Includes two CoC program models: interim housing (for adults/families) and youth interim housing (for ages 14-24).

Essential Services

The following eligible activities are permitted as part of essential services for individuals and families experiencing homelessness and residing in emergency shelters. The City of Detroit prioritizes case management that helps households to obtain permanent housing over other services listed below.

Case Management

The goal of emergency shelter is to provide a safe environment for persons in housing crisis AND to ensure that services and support are provided that ensure a person's time in housing crisis is both rare and brief. While HUD defines "essential services" widely, the City of Detroit requires all emergency shelters to provide the coordination of or direct case management services to all persons in housing crisis being served by their agency.

The cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant is eligible. Component services and activities consist of:

- Using the centralized or coordinated assessment system as required under § 576.400(d)
- Conducting the initial evaluation required under § 576.401(a), including verifying and documenting eligibility
- Counseling
- Developing, securing, and coordinating services and obtaining Federal, State, and local benefits
- Monitoring and evaluating program participant progress
- Providing information and referrals to other providers
- Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking
- Developing an individualized housing and service plan, including planning a path to permanent housing stability

Proof of housing focused case management services, including housing plans, case notes, etc., must be documented in the client's chart and HMIS when applicable.

Other allowable services under HUD's Essential Services Definition include the following. Please note that organizations must request City of Detroit approval prior to putting the following line items in their organizational budget:

Childcare

The cost of child care for program participants, including providing meals and snacks, and comprehensive and coordinated sets of appropriate developmental activities, are eligible. The children must be under the age of 13, unless they are disabled. Disabled children must be under the age of 18. The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.

Education Services

When necessary for the program participant to obtain and maintain housing, the costs of improving knowledge and basic educational skills are eligible. Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED). Component services or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies and instructional material; counseling; and referral to community resources.

Employment Assistance and Job Training

The costs of employment assistance and job training programs are eligible, including classroom, online, and/or computer instruction; on-the-job instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of providing reasonable stipends to program participants in employment

assistance and job training programs is an eligible cost. Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates. Services that assist individuals in securing employment consist of employment screening, assessment, or testing; structured job skills and job-seeking skills; special training and tutoring, including literacy training and prevocational training; books and instructional material; counseling or job coaching; and referral to community resources.

Outpatient Health Services

Eligible costs are for the direct outpatient treatment of medical conditions that are provided by licensed medical professionals. ESG funds may be used only for these services to the extent that other appropriate health services are unavailable within the community.

Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate medical treatment, preventive medical care, and health maintenance services, including emergency medical services; providing medication and follow-up services; and providing preventive and non-cosmetic dental care.

Legal Services

Eligible costs are the hourly fees for legal advice and representation by attorneys licensed and in good standing with the bar association of the State in which the services are provided, and by person(s) under the supervision of the licensed attorney, regarding matters that interfere with the program participant's ability to obtain and retain housing.

ESG funds may be used only for these services to the extent that other appropriate legal services are unavailable or inaccessible within the community.

Eligible subject matters are child support, guardianship, paternity, emancipation, and legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking, appeal of veterans and public benefit claim denials, and the resolution of outstanding criminal warrants.

Component services or activities may include client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling.

Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the subrecipient's employees' salaries and other costs necessary to perform the services.

Legal services for immigration and citizenship matters and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements are ineligible costs.

Life Skills Training

The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance use, and homelessness are eligible costs. These services must be necessary to assist the program participant to function independently in the community. Component life skills training are budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public transportation, and parenting.

Mental Health Services

Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions. ESG funds may only be used for these services to the extent that other appropriate mental health services are unavailable or inaccessible within the community.

Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances. Problem areas may include family and marital relationships, parent-child problems, or symptom management.

Eligible treatment consists of crisis interventions; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.

Substance Abuse Treatment Services

Eligible substance abuse treatment services are designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors and are provided by licensed or certified professionals.

ESG funds may only be used for these services to the extent that other appropriate substance abuse treatment services are unavailable or inaccessible within the community.

Eligible treatment consists of client intake and assessment, and outpatient treatment for up to 30 days. Group and individual counseling and drug testing are eligible costs. Inpatient detoxification and other inpatient drug or alcohol treatment are not eligible costs.

Transportation

Eligible costs consist of the transportation costs of a program participant's travel to and from medical care, employment, child care, or other eligible essential services facilities. These costs include the following:

- The cost of a program participant's travel on public transportation.
- If service workers use their own vehicles, mileage allowance for service workers to visit program participants
- The cost of purchasing or leasing a vehicle for the recipient or subrecipient in which staff transports program participants and/or staff serving program participants, and the cost of gas, insurance, taxes, and maintenance for the vehicle.
- The travel costs of recipient or subrecipient staff to accompany or assist program participants to use public transportation.

Services for Special Populations

ESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under paragraphs (a)(1)(i) through (a)(1)(x) of 24 CFR 576.102. The term *victim services* means services that assist program participants who are victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking.

Renovation/Rehabilitation of Buildings

Nonprofits and units of local government may use ESG funds to renovate or rehabilitate buildings for the use of the building as an emergency shelter.

Shelter providers seeking City of Detroit funds for shelter renovation cannot use their grant award in this manner without advance approval from the City of Detroit. Organizations who feel they need renovation assistance should reach out to their project manager to discuss their request.

Environmental clearance on properties is required in advance of starting work. Refer to Appendix D.

Eligible costs include: labor, materials, tools, and other costs for renovation (including major rehabilitation of an emergency shelter or conversion of a building into an emergency shelter).

If the building is renovated with ESG funds, then it must be maintained as a shelter for individuals and families experiencing homelessness for a minimum period, dependent on the amount of funds used and work done. The City of Detroit requires subrecipients to sign a lien agreement that secures this pledge in writing.

Organizations must receive an environmental clearance from the City of Detroit prior to starting work. If a rehabilitation or conversion of the building to an emergency shelter costs more than 75 percent of the value of the building **prior** to work starting, then the restricted use period is for 10 years. This period begins once the work is completed and the first individual or family experiencing homelessness occupies the facility.

If the building is renovated and costs less than 75 percent of the value of the building **prior** to work starting, the restricted use period is reduced to 3 years. This period begins once the work is completed and the first individual or family experiencing homelessness occupies the facility.

Shelter Operations

Eligible costs are the costs of maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter.

Health and Safety Protocol

All City of Detroit funded emergency shelters must have written policies and procedures that address emergency circumstances. Such circumstances include but are not limited to:

- Fire
- Natural Disasters
- First Aid and Emergency Protocols
- Infectious Disease Outbreak
- Pest Control
- Workplace Safety, Hygiene, and Hazardous Materials

Essential Services and Shelter Operations

Where the recipient or subrecipient uses ESG funds solely for essential services or shelter operations, the recipient or subrecipient must provide services or shelter to homeless individuals and families at least for the period during which the ESG funds are provided.

The subrecipient must seek prior approval from the City of Detroit if the shelter location identified in the original contract changes.

Implementing Assistance Under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA)

Minimizing Displacement

Consistent with other goals and objectives of ESG, subrecipients must assure that they have taken all reasonable steps to minimize the displacement of persons (families, individuals, businesses, nonprofit organizations, and farms) as a result of a project assisted under ESG.

Temporary Relocation Not Permitted

No tenant-occupant of housing (a dwelling unit) that is converted into an emergency shelter may be required to relocate temporarily for a project assisted with ESG funds or be required to move to another unit in the same building/complex. When a tenant moves for a project assisted with ESG funds under conditions that trigger the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), the tenant should be treated as permanently displaced and offered relocation assistance and payments consistent with URA.

Relocation Assistance for Displaced Persons

A displaced person must be provided relocation assistance at the levels described in, and in accordance with, the URA and 49 CFR 24. A displaced person must be advised of their rights under the Fair Housing Act. Whenever possible, minority persons shall be given reasonable opportunities to relocate to comparable and suitable decent, safe, and sanitary replacement dwellings, not located in an area of minority concentration, that are within their financial means. This policy, however, does not require providing a person a larger payment than is necessary to enable a person to relocate to a comparable replacement dwelling. As required by Section 504 of the Rehabilitation Act and 49 CFR 24, replacement dwellings must also contain the accessibility features needed by displaced person with disabilities.

Displaced Person

The term “displaced person” means any person, family, individual, business, nonprofit organization, or farm, including any corporation, partnership, or association, that moves from real property, or moves personal property from real property, permanently, as a direct result of acquisition, rehabilitation, or demolition for a project assisted under the ESG program.

This includes any permanent, involuntary move for an assisted project, including any permanent move from the real property that is made:

- After the owner (or person in control of the site) issues a notice to move permanently from the property or refuses to renew an expiring lease, if the move occurs on or after:
    - The date of the submission by the City of Detroit or a subrecipient, as applicable, of an application for assistance to HUD (or the City of Detroit) that is later approved and funded if the City of Detroit or the subrecipient has site control as evidenced by a deed, sales contract, or option contract to acquire the property

    - The date on which the City of Detroit or subrecipient selects the applicable site, if the City of Detroit or subrecipient does not have site control at the time of application, provided that the City of Detroit or subrecipient eventually obtains control over the site.
- Before the date described in this section, if the City of Detroit or HUD determines that the displacement resulted directly from acquisition, rehabilitation, or demolition for the project
- By a tenant-occupant of a dwelling unit and the tenant moves after execution of the agreement covering the acquisition, rehabilitation, or demolition of the property for the project.

A person does not qualify as a displaced person if:

- The person has been evicted for cause based upon serious or repeated violation of the terms and conditions of the lease or occupancy agreement; violation of applicable federal, state, and local law, or other good cause; and the City of Detroit determines that the eviction was not undertaken for the purpose of evading the obligation to provide assistance.
- The person moved into the property after the submission of the application but before signing a lease and commencing occupancy was provided written notice of the project, its possible impact on the person (e.g., they may be displaced), and the fact that the person would not qualify as a "displaced person" as a result of the project.
- The person is ineligible under 49 CFR 24.2(a)(9)(ii).
- HUD determines that the person was not displaced as a direct result of acquisition, rehabilitation, or demolition of the project.

The City of Detroit or a subrecipient may, at any time, request that HUD determine whether a displacement is or would be covered by this rule. See 24 CFR 576.408 for more information.

Shelter Habitability and Lead Requirements

Emergency Shelter

All City of Detroit funded emergency shelters must have a current Certificate of Occupancy from the City of Detroit Building, Safety, and Engineering Department (BSEED) and shall comply with all applicable City, State, and Federal fire, environmental, health, and safety standards and regulations. When ESG funds are used under the emergency shelter component for renovation or shelter operations, the building must meet the minimum standards for safety, sanitation, and privacy. This applies to all ESG funds used under this component, including match funds. Grantees may also establish standards that exceed or add to these minimum standards:

- Structure and materials: The shelter building must be structurally sound to protect residents from the elements and not pose any threat to the health and safety of the residents. Any renovation (including major rehabilitation and conversion) carried out with ESG assistance must use Energy Star and WaterSense products and appliances.

- Access: The shelter must be accessible in accordance with Section 504 of the Rehabilitation Act (29 USC. 794), implementing regulations at 24 CFR part 8, the Fair Housing Act (42 USC. 3601 et seq.), and implementing regulations at 24 CFR part 100; and Title II of the Americans with Disabilities Act (42 USC. 12131 et seq.) and 28 CFR part 35; where applicable.
- Space and security: Except where the shelter is intended for day use only, the shelter must provide each program participant with an acceptable place to sleep and adequate space and security for themselves and their belongings.
- Interior air quality: Each room or space within the shelter must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.
- Water supply: The shelter's water supply must be free of contamination.
- Sanitary facilities: Each program participant in the shelter must have access to sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.
- Thermal environment: The shelter must have any necessary heating/cooling facilities in proper operating condition.
- Illumination and electricity: The shelter must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the shelter.
- Food preparation: Food preparation areas, if any, must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.
- Sanitary conditions: The shelter must be maintained in a sanitary condition.
- Fire safety:
    - There must be at least one working smoke detector in each occupied unit of the shelter. Where possible, smoke detectors must be located near sleeping areas.
    - The fire alarm system must be designed for hearing-impaired residents.
    - All public areas of the shelter must have at least one working smoke detector.
    - There must also be a second means of exiting the building in the event of fire or another emergency.

Per the City's contract, subrecipients must immediately report problems, delays, or adverse conditions which materially affect the ability to complete the Project or prevent the meeting of time schedules, or material changes to the site in which services are being provided. This disclosure shall be accompanied by a statement of the action taken, or contemplated, by the Subrecipient and any City assistance needed to resolve the situation

Lead-Based Paint Requirements

The ESG interim rule establishes the following regarding lead-based paint remediation and disclosure:

The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821- 4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851- 4856), and implementing

regulations in 24 CFR part 35, subparts A, B, H, J, K, M, and R apply to all shelters assisted under ESG program and all housing occupied by program participants.

Under these regulations, facilities must be inspected to ensure there is no risk of exposure to lead-based paint hazards. If hazards are identified, action must be taken to address these hazards. If an emergency shelter falls under the definition of a zero-bedroom dwelling, it is exempt under the statute. Zero-bedroom dwelling is defined as follows:

Any residential dwelling in which the living areas are not separated from the sleeping area. The term includes efficiencies, studio apartments, dormitory or single room occupancy housing, military barracks, and rentals of individual rooms in residential dwellings.

The term "single room occupancy housing" is defined as follows:

Housing consisting of zero-bedroom dwelling units that may contain food preparation or sanitary facilities or both.

If an ESG-funded program provides shelter with units that have one or more bedrooms and receive assistance for more than 100 days, the program is required to establish and implement a policy that ensures that child-occupied spaces are free of lead-based hazards. If a program is exempt from the regulation (zero-bedroom units or receives assistance for 100 days or less), HUD recommends that policies to ensure lead safe living environments are implemented when units are occupied by children under six years old.

Emergency Shelter Operational Policies

All emergency shelters that receive funding from the City of Detroit must incorporate policies and protocol to ensure equality and the safety of all persons utilizing the homeless service system. Guidance is provided below on how shelter policies and requirements may be incorporated.

Religion

Religion plays an important role in many people's lives. Additionally, many homeless service system agencies were founded through religious organizations and mission driven activities. Regardless of an agency's background, any emergency shelter receiving City of Detroit funding must allow all persons staying in or receiving services to freely practice any religion or spiritual belief that they adhere to, or none at all if that is the case. In the cases of faith-based shelters that provide religious services, emergency shelter staff must clearly explain that any and all religious activities at the shelter are voluntary and not expected as a condition of stay.

Service Animals

Persons seeking emergency shelter or housing services **cannot** be denied based on their need for a service animal under the American with Disabilities Act. Only dogs and some horses can be service animals (no other pets). There are no requirements that a service dogs must meet. In addition to the American with Disabilities Act, HUD's Fair Housing Act also applies to persons seeking or staying in emergency shelter. Under the Fair Housing Act, shelters receiving HUD funding cannot deny a person access to shelter or services based on their need for a support animal including for emotional support. To clearly distinguish between a support animal and a pet, emergency shelters may ask only two questions:

1. Does the person seeking to use and live with the animal have a disability?
2. Does the animal work, provide assistance, perform tasks or services for the benefit of a person with a disability, or provide emotional support that alleviates one or more of the identified symptoms or effects of a person's disability?

If the answer to question 1 **or** 2 is NO, a shelter is not required to make an accommodation. If the answer to question 1 **AND** 2 is YES, then both Section 504 of the American with Disabilities Act and HUD's Federal Fair Housing Act require the emergency shelter provider to make accommodations and allow the support animal to remain with its owner for the duration of the person's stay.

Emergency shelters and/or service providers cannot require additional documentation regarding the service animal or the nature of the person's disability.

Additional reasons for service animal denial

Answering yes to both questions listed above does not give a free pass for any animal to stay in emergency shelter. Shelters should have written policies outlining the determination of service animals as well as the control and care for which their owners need to be responsible.

Shelter policy should include the following:

- All service animals must be harnessed, leashed, tethered, or contained and under the control and guidance of their owner at all times.
- All service animals must behave properly, while on shelter/agency property.
- The animal's owner accepts all responsibility for the care and well-being of the animal including behavior, sanitation, and clean-up.
- Animals may be denied entrance to the shelter if:
  - The specific animal in question poses a direct threat to the health or safety of others that cannot be reduced or eliminated by another reasonable accommodation, **or**
  - The specific service animal in question would cause substantial physical damage to the property of others that cannot be reduced or eliminated by another reasonable accommodation.
- Breed, size, and weight limitations may not be applied to a service animal.

Shelter Resident Death

As death too is a fact of life, emergency shelters receiving City of Detroit funding must enact written protocol on staff procedures and documentation when a person in housing crisis dies on the premises. All agencies' protocol must include the following:

In case of death, staff should:

- Call 911.
- DO NOT move the person or touch anything in the vicinity of the body.
- Call a second staff member for support.
- Inform the Shelter Manager or supervisory personnel.
- The Shelter Manager or supervisory personnel is required to inform the senior level staff (e.g., Executive Director, Chief Operating Officer) as soon as possible.
- All staff involved in the incident must provide documentation of events and actions taken within 24 hours of death.
- Maintain confidentiality and composure. Even post-mortem, client information should not be made public or available to anyone outside the scope of their release of information.

Shelter Resident Personal Belongings

All City of Detroit funded emergency shelters funded are required to have written policies and procedures on personal belongings and property in possession of those seeking shelter.

Emergency shelters have the right to limit the amount or size of belongings either stored or transported in and out of shelter facilities. Shelters that choose to limit the amount of personal belongings should assist in locating alternative storage locations so that persons in housing crisis are not required to dispose of personal belongings as a condition of shelter stay.

Shelter Resident Money and Valuables

Persons residing in communal living spaces often have difficulty locating safe storage options for their valuables and/or money. City of Detroit funded emergency shelters must include in their policies a protocol for persons seeking shelter to store their money and or valuables in a safe location. Under no circumstances are staff of emergency shelter services allowed to hold or store valuables. Emergency shelters that do offer safe storage options for valuables should detail how items will be stored, the storage and retrieval processes, as well as the days and times that assigned staff will be available to safely store items.

Shelter Resident Prescription Medications

Emergency shelters funded by the City of Detroit are required to have written policies and procedures on prescription medication storage and distribution for persons staying in shelter. Shelters without on-site medical staff who are qualified to administer medication should

include protocol on medication storage, access, and self-administration. Refrigeration should also be made available for all medications requiring it. Medications may not be stored in communal refrigeration or in unlocked areas. Appropriate record-keeping and client/staff login procedures should also be detailed in the shelter policies. Under NO circumstances are non-approved staff allowed to administer or distribute prescription medications.

Substance Use

While drugs and alcohol may not be allowed on the premises, Detroit's emergency shelters provide service to many clients who are actively using these substances as they need safe environments to stay in. Detroit emergency shelters aim to offer a non-judgmental approach that attempts to meet clients "where they are at" with their substance abuse. Instead of denying services to clients who are using, shelter and service providers must try to give opportunities for the clients to minimize the harms associated with substance abuse. Additionally, emergency shelter agencies must have written policy and procedures on **overdose detection and response.**

In cases where persons in housing crisis continue to use on site the following protocol should be followed:

- Staff will not ask clients to be abstinent, only inform clients that they cannot use in the shelter.
- Staff should help clients recognize that some ways of using substances are clearly safer than others.
- Staff should recognize that the realities of poverty, class, racism, social isolation, past trauma, sex-based discrimination, and other social factors affect clients' vulnerability to and capacity for effectively dealing with substance use.
- Staff should assist clients in accessing services appropriate to their needs.

Manufacturing, Distribution or Sales

Under no circumstances is manufacturing, distribution, or sale of any illegal or prescribed substance permitted in, on, or around City of Detroit emergency shelter facilities. Evidence of staff or persons seeking shelter involvement in these activities will result in removal from the property and may result in temporary or long-term refusal of services. If a resident is dismissed, the organization must report the discharge, suspension, or ban in the "incident" section in HMIS within 24 hours.

Weapons

Many persons requesting emergency shelter are forced to travel with all or most of their personal belongings. In some cases, persons requesting or staying in emergency shelters may have legal or illegal weapons in their possession. Shelter staff will make the determination as to what constitutes a weapon. Shelter staff must notify all persons entering shelter of their weapons policies. Each individual City of Detroit funded emergency shelter must have a written policy and procedure detailing both what constitutes a weapon and how staff should

proceed once a weapon has been identified. Policies and practices on identifying and securing weapons must be clearly outlined in public spaces for persons seeking shelter or services to see and presented in a manner that is clear and easy to understand.

Work tools and any other devices which may be used in a way that could cause serious bodily injury must also be reported to shelter staff. Emergency shelter staff must notify all persons requesting entrance into shelter of weapons policies and procedures. Shelter staff will follow agency weapons protocol to ensure the safety of all persons being served. Attempts to bring weapons into a City of Detroit emergency shelter without notifying staff may result in an immediate denial of service or stay. If a resident is dismissed, the organization must report the discharge, suspension or ban in the "incident" section in HMIS within 24 hours.

Violent Behavior

The City of Detroit strongly encourages staff to use de-escalation practices in any tense or escalating emergency shelter situation. Emergency shelter policy and procedures will outline shelter protocol for both de-escalation practices and for when a situation escalates to an unsafe environment. Such protocols may include:

- A client will be told to leave the shelter when staff has witnessed the person, or s/he has admitted to, being violent or physically intrusive inside the shelter, or s/he has repeatedly targeted another individual. This includes:
    - Hitting, kicking, slapping, pushing
    - Throwing objects at someone
    - Any unwanted physical contact
    - Being verbally abusive repeatedly to the same person

Shelter Policy may read:

1. Staff will intervene in a conflict in the shelter and encourage those involved to resolve disagreements respectfully, offer to mediate, and name abusive behavior.
2. Staff will prioritize being in common areas with clients when tensions are high.
3. Whenever possible, the decision to tell a client to leave should be discussed with the manager or another support worker.
4. When a client has assaulted anyone in the shelter or been physically intrusive or aggressive (including unwanted touching) and staff have seen it, or the person has admitted it, s/he must leave.
5. Staff should be honest with the client about why s/he is being asked to leave. If possible, help the person with their plans and provide him/her with alternatives. Staff should remain non-judgmental.
6. The client may react angrily and staff may be the target of that anger. If a staff member is concerned about personal safety and s/he is on shift alone, call in another staff person before talking with the client and, if necessary, notify the police. Notify the Shelter Manager immediately and complete an Incident Form.

7. Report discharge, suspension, or ban in the “Incidents” section in HMIS within 24 hours.

Intake Procedures for Emergency shelters

Hours of Operation

All Emergency shelters will operate 7 days a week and clearly state and/or display hours of operation. Shelter intake hours and supportive services hours will be clearly defined and advertised to avoid client confusion and disorientation.

Shelters not operating on a 24-hour basis will create and implement a policy for extension of their operating hours during inclement weather and during designated emergency situations including, but not limited to:

- Severe weather (see Appendix F)
- Natural disasters
- Other such situations as designated by governmental authorities

Shelter beds will be held for a period of one night of a person’s absence from shelter. Extenuating circumstances require pre-approval. All shelters should have a clear process for holding beds in the case of extenuating circumstances.

Intake Procedures

Intake procedures on persons presenting in housing crisis must be administered consistently and equally, regardless of disability or other personal characteristics. See *Documenting Homelessness* for rules and procedures.

All shelters should inform clients about shelter rules in writing. Clients should be requested to sign off that they received these rules.

During the intake process, emergency shelter providers must refrain from asking questions about disabilities and other protected information until it has been made clear to the client(s) that they have been admitted into the program.

After the initial intake process is complete, staff should inform each client that answering the HMIS questions is voluntary and that any information gathered is for HMIS purposes only. Staff should clarify that answering the HMIS questions and will not affect the client’s ability to stay in the shelter or access services provided through the program.

Lack of adequate staffing to complete an intake is not an appropriate condition for refusal to accept a referral of client presenting for shelter. In such cases, providers should collect as much information as practical and complete the full assessment as soon as possible.

After an applicant has been approved for admittance into a shelter or service, it is permissible to ask the person about disability and other health-related issues ONLY if it pertains to program eligibility or as part of a reasonable accommodation request. It is a good practice to have the post-acceptance questioning regarding disability and other supportive service needs conducted by a supportive services staff member instead of a housing management staff member.

The City of Detroit expects that all funded emergency shelters work to create a welcoming environment for persons entering in housing crisis. Such environments may include (but are not limited to):

- Welcoming persons as they enter the shelter
- Introducing staff when first meeting persons in housing crisis
- Making the first move to engage persons in need. (Don't wait for people to come to you for help.)
- Ensure that all discussions that include personal information or business are conducted in as private of a space as possible.
- Maintain a clean and orderly environment.

***Reminder**: All emergency shelters receiving HUD funding are required by federal law to adhere to HUD's Equal Access Rule. The Equal Access Rule provides protection for any person or family seeking emergency shelter and removed barriers to access based on gender identity and family composition. No exceptions will be made to the requirements under the law. The City of Detroit stands firmly that all persons requesting shelter and utilizing shelter services are treated with the utmost respect and dignity. Discrimination of any kind will not be tolerated within the Detroit Homeless Service System. Refer to the definitions section in the earlier part of this Manual for additional guidance.*

Provision of Services

Case Management Services

While the immediate goal of emergency shelter is to ensure that those in housing crisis are sheltered and safe, once this has been established shelter providers are expected to help residents leave the facility as quickly as possible to permanent housing. All shelters are expected to have access to housing case management services on site and provide clients with linkages to other assistance such as mental or physical health treatment, legal services, and more. Housing case management services and the documentation of them must include, at a minimum, the following:

- Brief case notes to document services provided to clients.
- A housing plan (Appendix E) that was created within 14 days of shelter entry, either via HMIS or comparable database, to document client housing goals and support needed to achieve the goal.
    - At minimum, housing plans must be updated every 90 days.

- Client case management progress records in HMIS and/or the client chart. Case management progress must be made available for review.
    - Prior to grant award, organizations should designate whether they will be tracking services via HMIS or a comparable database.

Special Population Considerations

Recommending persons in housing crisis to other programs because they have a disability is called steering and it is illegal discrimination. While all persons in housing crisis should have access to the full range of homeless system services, there are specific populations that may require special attention.

Serving Unique Populations

Families with School-Aged Children

The educational needs of children and youth must be accounted for, to the maximum extent practicable. Families with children and unaccompanied youth must be placed as close as possible to the school of origin so as not to disrupt the children's education. Projects that serve homeless families with children and/or unaccompanied youth must have policies and practices in place that are consistent with the laws related to providing education services to children and youth. These recipients must have a designated staff person to ensure that children and youth are enrolled in school and receive education services. Homeless families with children and unaccompanied youth must be informed of their eligibility for McKinney-Vento education services and other available resources. Recipients shall maintain documentation in the participant's case file to demonstrate that these requirements have been met and that applicants and clients understand their rights.

Mandated Reporting

The Michigan Child Protection Law, 1975 PA 238, MCL 722.621 et. seq., requires the reporting of child abuse and neglect by certain persons (called mandated reporters) and permits the reporting of child abuse and neglect by all persons. The Child Protection Law includes the legal requirements for reporting, investigating, and responding to child abuse and neglect. This document is to assist mandated reporters in understanding their responsibilities under the Child Protection Law. For copies of the Child Protection Law, contact the local Michigan Department of Health and Human Services (MDHHS) office or go to www.michigan.gov/mdhhs.

Shelter providers and service coordination staff may be considered mandated reporters under the statute. Please refer to above mentioned documents for clarification. Regardless of staff capacity, all City of Detroit funded emergency shelters are required to have written policies and procedures outlining protocol for when child abuse is suspected or witnessed.

Criminal History

While permissible to inquire about a person's criminal convictions, Emergency Shelter providers should keep the following in mind:

- What is the programmatic intent of the questions being asked?
- Will additional barriers be created as a result of these questions?
- Are all applicants asked the same questions?

It is important that a shelter provider uniformly reject all applicants with the same criminal history (except in those cases in which a reasonable accommodation has been granted). If there are specific convictions that would warrant a rejection, this information should be clearly articulated in the organization's policies and procedures to ensure that they are enforced in a standardized way. Barriers to entry should be avoided to the greatest extent possible.

Alcohol and Substance Use and Abuse

Alcoholism and past illicit drug use are considered disabilities under Federal Fair Housing laws and are not a basis for denying a person housing and/or shelter. Emergency shelter providers are prohibited from asking a prospective client/household if they have history of either alcohol abuse or illegal drug use during intake. Additionally, asking a shelter resident with a known history of past drug or alcohol abuse to prove that they are not still using is **illegal**. Fair housing laws prohibit questions about treatment or requests for verification that a person is no longer using. Stereotypes about people with substance abuse disabilities (such as, "once a user, always a user") must not be used to make decisions about access to shelter. Current illegal drug use is a permissible topic that an emergency shelter provider may question a prospective shelter resident about only if the same question(s) are posed to each prospective shelter resident. Current illegal drug use is not a protected disability under fair housing laws, however, emergency shelter providers cannot single out certain individuals for questions about current illegal drug use.

HIV/AIDS

Fair housing laws recognize HIV-positive status as a disability. Discrimination of any kind against people with HIV or a violation of their right to confidentiality is illegal. While shelter providers may be aware of one or more HIV-positive individuals, there could also be other individuals with HIV receiving shelter. To prevent the spread of HIV, universal precautions against transmission should be taken at all times. Universal precautions are procedures used to handle the blood, body fluids, open skin or mucous membranes (e.g., inside of the mouth or nose) of all individuals, regardless of whether they are known to have HIV or hepatitis. Such precautions allow the isolation of potentially harmful fluids, without isolating individuals.

Universal precautions include:

- Treating all blood and body fluids as if they are infected with HIV or hepatitis
- Wearing latex gloves when touching blood or body fluids
- Using bleach to clean up any blood spillages
- Washing hands with soap and running water after removal of gloves
- Disposing of latex gloves by rolling them up and placing them in plastic bags. Universal precautions can be posted above sinks and in other locations in shelters for all staff and residents to follow.

Ask a local AIDS service organization or contact the federal Centers for Disease Control for more detailed information or pamphlets about universal precautions.

Exit Policies for Shelter Residents

Persons in Housing Crisis Should be Banned from Shelter Only as a Last Resort

The City of Detroit recognizes that emergency shelter is used by persons who are in housing crisis. Staff must find a balance in providing a safe, communal environment and serving persons who are both entering with high vulnerability and long histories of trauma. If a client has repeated instances of inappropriate behavior that jeopardizes the safe and communal atmosphere of the shelter, a client may be given warnings; placed on daily assess or evicted; or barred for a period of time. All emergency shelters will have written policies and procedures that detail termination of services and reflect the following:

Warnings

If a person utilizing emergency shelter services disregards a shelter policy and is not receptive to being told by staff that it is unacceptable behavior, they will be given a warning. It is important that the person be made clearly aware of why they are being given the warning. If the person receives too many warnings about the same unacceptable behavior they may be asked to leave. However, if a person has several warnings on file, but on different topics, then they will not be asked to leave.

Daily Assessments

This indicates that there were significant issues that arose during the current or recent previous stay of a client. If the incidents occurred during their previous stay, the client should be made aware that the shelter will closely monitor their behavior related to the daily assessments, as a condition of the shelter offering space. If for example, there was drug paraphernalia found in the client's things when a person moved out, then the alcohol and drug policy should be reviewed during the intake. The client may also be given fewer warnings about their behavior during their stay and may be asked to leave sooner if they are unable to follow the guidelines of the shelter during this new stay. Daily assessment of a person's behavior will be logged in client files or as part of HMIS reporting.

Suspension

A "suspension" is defined here as an action whereby a homeless service provider restricts shelter and/or services to a person in housing crisis for up to three (3) days. If the person is in need of shelter, the suspending agency is responsible for making a referral to the CAM Access Point to be connected with available shelter beds. Any person/household suspended from a City of Detroit funded-emergency shelter must be recorded in the HMIS system within 24 hours of the suspension in order to prevent future referrals.

Ban

A "ban" is defined here as an action whereby a homeless service provider refuses shelter and/or services to a client for more than three (3) days.

A service provider has the right and responsibility to protect the safety of their staff and persons in housing crisis and may resolve a hazardous situation as they see fit. In extreme cases, such as physical violence or the use of a weapon, it is clearly understood that any of the agency's authorized staff may choose to suspend a person for cause. During that time, a ban may or may not be considered.

Disciplinary action shall be proportional to the infraction. A ban shall be used in only the most intractable of circumstances because of the devastating effect losing services has on a person.

Each agency shall designate those staff authorized to ban a person in housing crisis, preferably those with social service and conflict management skills. The agency shall have a goal of objectivity in the process and utilize bans only as a last resort.

All organizations are expected to have clearly outlined policies that describe when and how people would be banned. Policies and procedures regarding the banning process shall:

- Be developed and approved by the City of Detroit
- Be easily understandable to persons in housing crisis and shared upon entry
- Be conspicuously posted and periodically communicated to both frontline staff and to persons in need of emergency shelter services and:
    - State that a decision to ban cannot be unilaterally made. Recommendations on banning must be approved by a two-step process.
    - Include an appeals process. If a client is banned, they shall have the right to appeal to a senior authority at the agency.
    - Incorporate the Grievance Procedure.
- If a ban is to be imposed, the agencies shall make every attempt to communicate the following to the person in writing:
    - The reason for the ban
    - The duration of the ban (cannot exceed one year)

- Any conditions or stipulations imposed
- A referral to an alternative service provider, if feasible. (The agency shall make every attempt to find the client an available alternative agency that provides equivalent services or keep a record of why the referral was not possible.)
- A description of the agency's appeals process; and a copy of the Grievance Procedures.
- The client shall be notified that they have a right to file a grievance with the shelter provider if they believe they have been treated unjustly.
- Records: For each banning incident, confidential standardized records shall be kept. Emergency shelter staff will report all persons banned into HMIS within 24 hours to ensure the person in housing crisis does not get referred back to the same shelter.
- Time Limit: Any person who is banned for more than a six-month period may file an appeal with the agency six months from the date of his or her discharge and again every six months after that. A ban may not last longer than a one year period from the date the incident occurred unless written authorization has been obtained from the City of Detroit program manager and has been uploaded in HMIS.

While bans are made at the agency level, it is imperative that this information should also be shared with CAM as the entity that places clients in shelter programs. Within 24 hours of the decision to ban a client, this information must be entered in HMIS via incidents tab on the client profile. This allows for successful placement but also for an effective risk assessment for the City of Detroit homeless service system as a whole. Bans will not be honored unless entered in HMIS.

Participant Discharge/ Termination of Assistance

If an ESG program participant violates program requirements, a homeless service system agency may terminate assistance given that they follow a formal process that has been established by the agency. The process must recognize the rights of the individuals affected and subrecipients must exercise judgment and examine all extenuating circumstances when determining which violations warrant termination. Assistance should only be terminated in the most severe cases.

Discharge Procedure

The goal of emergency shelter is both to provide a safe environment for persons in housing crisis AND to provide services and coordination that ensure that a person's housing crisis is rare and brief. Emergency shelters that receive City of Detroit funding must develop discharge policies and procedures that detail reasons for discharge, staff efforts, exit location and connection to services. The City of Detroit emergency shelters must ensure that when service is terminated, either voluntarily or involuntarily, employees follow an orderly and

respectful process. Shelters are strongly encouraged to connect with CAM 15 days prior to a household's discharge if they are still in need of emergency shelter.

Discharge may occur when the person in housing crisis:

- Achieves their goals and is ready to discontinue service
- No longer wants to stay at the shelter and receive service
- Refuses to adhere to the policies and procedures of the shelter (e.g., violent behavior or weapons possession)
- Has needs that exceed the resources and expertise of the shelter.

Detroit emergency shelters should consider implementing the following:

Discharge Checklist

As a person prepares for discharge, staff should use the following checklist to ensure an orderly and comprehensive discharge and file closing process:

- Wrap up case planning with the client
- Complete a discharge/aftercare plan with the person exiting
- Record the reason for discharge
- Make appropriate referrals where external aftercare is required
- Ensure all personal property in the person's file is returned to the them
- Enter a closing summary in the person's HMIS file within two days of discharge.

Closing Summary

A closing summary entered into the person's record must be documented in HMIS by staff within two days of departure. The closing summary should include:

- The reason for discharge
- Service goals and outcomes
- Plans for follow-up
- Other summary comments as appropriate.

Involuntary Discharge

In some cases, Emergency shelter staff may require a person to be discharged on an involuntary emergency basis. The Shelter Manager must sign off on the decision to ask a person/household to leave. Employees have an obligation to assist such exiting households in linking to other appropriate services prior to leaving the shelter. This may include, among other things, making referrals or providing resources for clients to follow up with. Staff should always remain non-judgmental in their approach to the client. Be honest with the person about why they are being asked to leave.

A person in housing crisis may react angrily to the involuntary discharge and staff may be the target of that anger. If there are concerns that this may happen, staff should ensure that there is another staff person or support person with them during the procedure.

Appeal Process

If a person in housing crisis expresses a concern or makes a complaint concerning their involuntary discharge, they may take the following steps:

1. Discuss the matter fully with the Shelter Manager, who will decide on any corrective action required within the boundaries of his/her authority. The Shelter Manager will notify the Executive Director of the person's concerns and the action taken.
2. If still unsatisfied with the outcome, the person/household may submit a request for intervention to the Executive Director, who will acknowledge receipt within five days. The Executive Director will take any corrective action required within 10 days and inform the client, in writing, of the resolution.
3. Individuals/households have the right to ask assistance of another person to speak on their behalf or help fill out a consumer grievance form.
4. Individuals/household grievances are reported to the City of Detroit. The CoC Grievance Committee reserves the right to review grievances to provide review that does not involve the person about whom the complaint was made or the person who reached the decision.
5. Copies of all documents are placed in the client file.

Emergency Shelter Client Files

General Program Documentation

Every client who has received a direct service from an ESG subrecipient must have a client file that documents the reason(s) for the assistance. Each file must include the documentation in the list below.

Required File Documentation

- A VI-SPDAT assessment by Coordinated Assessment Model staff
- Signed HMIS Release(s) (for all members of the household)
- Verifications of Homelessness or At Risk of Homelessness that align to the project with which they are involved (third party certification or self-declaration, plus backup documentation) or proof of self-certification of homelessness sign-in sheet and process
- Initial Intake Form
- If the shelter has identified the resident as chronically homeless in HMIS they should notify CAM
- Housing focused Case Notes (minimum of monthly case notes)
- Individualized Housing and Service Plan (see Appendix E)
- As applicable, determinations of ineligibility (e.g., if client requests services and is deemed ineligible or declines services, written explanation of why the client was ineligible or declined services, along with any rights of appeal they may have)
- State issued identification (or HMIS ID if state issued ID is not available)
- Proof of referral from or to CAM

All information required above must be completed in HMIS unless an organization receives a waiver from the City of Detroit prior to contract start.

Other Emergency Shelter Documentation

Documentation of compliance with the applicable requirements for providing service and assistance (24 CFR 576.102) includes:

- Case Management Documentation: Assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant. The following must be documented:
  - Initial evaluation
  - Eligibility
  - Counseling
  - Program participant progress
  - Information and referrals to other providers
  - Ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking
- Child Care Documentation: Child care provided for program participants
  - Meals and snacks provided
  - Appropriate developmental activities provided

    - Verification that the child care center is licensed
- Education Series Documentation: Document the costs of improving knowledge and basic educational skills
    - Instruction or training in consumer education
    - Instruction or training in health education
    - Substance use prevention instruction or training
    - Instruction or training in literacy
    - English as a second language instruction or training
    - General Education Development (GED) instruction or training
    - Component services or activities such as: screening, assessment, and testing; individual or group instruction; tutoring; provision of books, supplies and instructional material; counseling; and referral to community resources.
- Employment Assistance and Job Training Documentation
    - Employment assistance and job training programs, including: classroom, online, and/or computer instruction; on-the-job instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential.
    - Stipends provided to program participants in employment assistance and job training programs.
    - Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.
    - Services that assist individuals in securing employment include: employment screening, assessment, or testing; structured job skills and job seeking skills; special training and tutoring, including literacy training and prevocational training; books and instructional material; and counseling or job coaching.
    - Referrals to community resources.
- Outpatient Health Services Documentation: Documents direct outpatient treatment of medical conditions provided by licensed medical professionals.
- Legal Services Documentation
    - Legal advice provided
    - Verification that attorney is licensed and in good standing with the bar association
    - Matters that interfere with the program participant's ability to obtain and retain housing. Eligible subject matters are child support, guardianship, paternity, emancipation, and legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking, appeal of veterans and public benefit claim denials, and the resolution of outstanding criminal warrants.
- Life skills training documentation: Documents life skills training necessary to assist the program participant to function independently in the community (e.g., budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public transportation, and parenting).
- Mental health services Documentation: Documents direct outpatient treatment by licensed professionals of mental health conditions.

- Substance use treatment services documentation
  - Substance use treatment services designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors
  - Verification that treatment providers are licensed or certified professionals
  - Duration of outpatient treatment (up to 30 days)
  - Group and individual counseling sessions
  - Drug testing.
- Transportation Documentation
  - Transportation of a program participant to and from medical care, employment, child care, or other eligible essential services facilities
  - Program participant's travel on public transportation

Section 8: Homelessness Prevention and Rapid Re-Housing Introduction

Summary

The City of Detroit encourages subrecipients to use ESG funds to implement activities that focus on and ensure the ongoing housing stability of program participants, rather than using funds to exclusively provide one-time emergency rent or utility assistance. Subrecipients should use ESG funds to target individuals and families who are living on the streets or in emergency shelters and focus on rapidly re-housing them into permanent housing.

Rapid Re-Housing ensures that emergency shelter resources are available to individuals and families who are most vulnerable in the community and as a result, the City of Detroit encourages subrecipients to give Rapid Re-Housing the highest priority under ESG. ESG programs should be designed to focus on Rapid Re-Housing while broadening existing homelessness prevention activities, with the overall goal of assisting program participants in obtaining and maintaining permanent housing.

Subrecipients should be able to demonstrate that program participants have the household income necessary to successfully maintain their housing prior to exiting them from ESG-funded programs and activities (unless a participant is terminated due to violating program requirements according to the formal termination process established by the subrecipient).

Homelessness prevention and Rapid Re-Housing are broadly divided into the two same assistance components:

- Housing relocation and stabilization services
- Short-term and medium-term rental assistance.

The difference between the two eligible components is the housing status of the individual or family at the point of entry into the project. Under the HUD homeless definition, if the individual/family is considered category 1 or category 4 (where the individual also meets the eligibility criteria for category 1) the household is entered into a Rapid Re-Housing project. If the individual/family is considered category 2 or 4 (but not meeting category 1 as above) or at risk of homelessness, then they are entered into a homeless prevention project.

Section 9: Homelessness Prevention

Summary

Homeless prevention services are most effectively implemented when targeted to those at the greatest risk of losing housing. Households should demonstrate that they do not have sufficient resources or support networks to prevent them from moving to an emergency shelter or other place defined under category 1 of the homeless definition.

Enrollment in a prevention program typically lasts around 2-6 months, although enrollments can be longer. ESG subrecipients should negotiate with landlords as the first step in resolving eviction crises. Providers should focus on a case management plan to ensure long-term stability for program participants. Providers are expected to implement a case management plan that will increase household incomes and/or increase access to mainstream benefits for program participants (e.g., SOAR, SNAPs, TANF).

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

Homeless Prevention participants must have an annual income that is below 30 percent of the annual median family income for the area if being served with ESG. For ESG-CV eligibility requirements, refer to the ESG-CV manual.

Referrals

NEW

Prevention providers serving clients that are in doubled-up situations and do not have a legal lease must receive 100% of referrals through CAM. Eligible households contact CAM, receive a brief screening and prioritization assessment, and are then referred for services. A copy of the prevention prioritization assessment can be found here. Providers are required to enter in a referral outcomes in HMIS.

Performance Benchmarks

These benchmarks are expectations of prevention providers and will be integrated into ongoing programmatic monitoring:

- Percentage of clients in the program for 3 months or less- *Please Note-We will take into consideration impact of COVID-19 on benchmark set for 21-22 grant term*;
- Percentage of clients who exit to a permanent housing destination.

Expectations for Prevention Staff Training

In order to ensure high quality service provision for those receiving Rapid Re-Housing, agencies administering Rapid Re-Housing programs within the Detroit CoC will document Rapid Re-Housing staff participation in training and stay current on relevant topics, including:

- HUD Regulatory Requirements
- ESG Regulatory Requirements
- Housing First
- Motivational Interviewing
- Fair Housing/ Equal Access/ Housing Law
- Safety Protocol for serving clients in the community, including those fleeing domestic violence
- Client's Rights/Grievance Process
- Trauma Informed Care

During the monitoring process, organizations will be asked to provide the detail of their annual staff training policy and protocol as well as information on the on-boarding process for new employees.

The Housing and Revitalization department has compiled a list of free training materials on some of the topics listed above. This training resource can be found here, using password "housing". This resource also include posttests that should be completed and kept in staff's file for auditing purposes. In addition, we strongly encourage organizations to utilize any and all available training provided via the Continuum of Care to meet these training expectations.

Rental Assistance for Homelessness Prevention

Program participants may receive up to 24 months of rental assistance during any 3-year period. This assistance may be short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance.

Rental assistance may be tenant-based or project-based.

1. Short-term rental assistance is assistance for up to 3 months of rent.
2. Medium-term rental assistance is assistance for more than 3 months but not more than 24 months of rent. However, beginning January 1, 2020, at least 90% of all clients must be enrolled in the program for 3 months or less.
3. Payment of rental arrears consists of a one-time payment for up to 6 months of arrears, including any late fees.

NOTE: Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance or living in a housing unit receiving project-based rental assistance or operating assistance through other public sources (such as Housing Choice Voucher/Section 8 or other public housing).

Housing Relocation and Stabilization Services

Financial Assistance

ESG funds may be used to pay housing owners, utility companies, and other third parties for the costs listed below. Note that this does not include any direct payments to the applicants/resident.

Security Deposits

ESG funds may pay for a security deposit that is equal to no more than 1.5 months of rent.

Last Month's Rent

If necessary to obtain housing for a program participant, then the last month's rent may be paid from ESG funds to the owner of that housing at the time the owner is paid the security deposit and the first month's rent. This assistance must not exceed one month's rent and must be included in calculating the program participant's total rental assistance (which cannot exceed 24 months during any 3-year period).

Utilities

No program participant shall receive more than 24 months of utility assistance within any 3-year period.

Utility Deposits

ESG funds may pay for a standard utility deposit required by the utility company including the following utilities:

- Gas
- Electric
- Water
- Sewage

Utility Payments

ESG funds may pay for up to 24 months of utility payments per program participant, per service, including up to 6 months of utility payments in arrears, per service. A partial payment of a utility bill counts as one month. This assistance may only be provided if the program participant or a member of the same household has an account in their name with a utility company or proof of responsibility to make utility payments. Eligible utility services are gas, electric, water, and sewage.

Rental Application Fees

ESG funds may pay for the rental housing application fee if it is a standardized fee charged to all applicants, not just those in an ESG program.

Moving Costs

ESG funds may pay for moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance under housing stabilization services and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.

Stabilization Services

ESG funds may be used to provide specific supportive services to eligible households. These services may be provided with or without the provision of financial or rental assistance, for a maximum of 24 months.

ESG funds may be used to provide the following categories of stabilization services:

Housing Search and Placement

For participants who need assistance finding or securing housing, ESG funds may support the services or activities necessary to assist them in locating, obtaining, and retaining suitable permanent housing. These activities include:

- Assessment of housing barriers, needs, and preferences
- Development of an action plan for locating housing
- Housing search
- Outreach to and negotiation with owners
- Assistance with submitting rental applications and understanding leases
- Assessment of housing for compliance with ESG requirements for habitability, lead-based paint, and rent reasonableness/FMR as described above
- Assistance with obtaining utilities and making moving arrangements
- Tenant counseling.

Housing Stability Case Management

ESG funds may be used to pay costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing. Funds may also be used to assist a program participant in overcoming immediate barriers to obtaining housing.

Case management assistance cannot exceed 30 days during the period that the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing.

Whether paid for with ESG funds or not, housing stability case management should be provided as needed to support households to regain housing stability and link them to other services in the community. The program must, at minimum, develop a plan to assist the program participant to retain permanent housing after the ESG assistance ends. The plan should take into account all relevant considerations, including: the program participant's current or expected income and expenses; other public or private assistance for which the program participant will be eligible and likely to receive; and the relative affordability of available housing in the area.

Case management services are intended to be flexible and respond to the participant's needs, while leveraging other services in the community as much as possible. During their enrollment in the program, participants must meet with a case manager not less than once per month to work towards long-term housing stability.

Mediation

ESG funds may pay for mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the participant from losing permanent housing in which they currently reside.

Legal Services

Component services or activities may include client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling.

Eligible Subject Matters: These include child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; and the resolution of outstanding criminal warrants. **Eligible Costs**: Eligible costs are the hourly fees for legal advice and representation by attorneys licensed and in good standing with the bar association of the State in which the services are provided, and by person(s) under the supervision of the licensed attorney, regarding matters that interfere with the program participant's ability to obtain and retain housing. Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the program employees' salaries and other costs necessary to perform the services.

Legal services for immigration, citizenship matters, and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements are also ineligible costs.

Credit Repair

ESG funds may pay for credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a

free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.

Homeless Prevention Client Files

General Program Documentation

Every client who has received a direct service from an ESG subrecipient must have a client file that documents the reason(s) for the assistance. Each file must include the documentation listed below.

All Client Files

- An assessment by either project staff or Coordinated Assessment Model staff
- Signed HMIS Release(s) (for all adult members of the household)
- Verifications of At Risk of Homelessness that align to the project with which they are involved (third party certification or self-declaration, plus backup documentation)
- Initial Consultation Form
- Case Notes (minimum of monthly case notes)
- Individualized Housing and Service Plan
- Income Verification including backup documentation (paystubs, third-party verifications, etc.)
- As applicable, determinations of ineligibility (e.g., if client requests ESG services and is deemed ineligible or declines services, written explanation of why the client was ineligible or declined services, along with any rights of appeal they may have).

Homelessness Prevention Specific Forms

- Lead compliance documentation- this form is required for all clients, even if provided with legal services only, regardless if the client stays or moves into a different unit
- Current unit Inspection Report (Habitability)- this form is required for all clients, even if provided with legal services only, regardless if the client stays or moves into a different unit
- Signed lease containing client's name(s)
- Rent agreement (with landlord)
- Rent reasonableness/FMR documentation
- Documentation of services and assistance provided to the client, including, as applicable, the security deposit, rental assistance, and utility payments made on behalf of the client
- Copies of financial assistance payments (including type of assistance, payee name, client name, check number, and amount paid using ESG funds)
- Staff certification of eligibility
- Duplication of Benefits form

Housing Inspection Requirements

Subrecipients cannot use ESG funds to help a program participant remain in or move into housing that does not meet certain standards. Depending on the situation, the City of Detroit has determined that subrecipients must use either the Housing Quality Standards (HQS) form or the Habitability Standards form.

Both HQS and habitability inspections must be conducted by a qualified ESG recipient or subrecipient staff or contractor. Program participants may not conduct inspections.

In addition:

- If an eligible household needs homelessness prevention assistance to remain in its existing unit, the assistance can only be provided if that unit meets habitability standards.
- If an eligible household needs homelessness prevention assistance to move to a new unit, the assistance can only be provided if the new unit meets the housing quality standards (HQS).
- Minimum standards must be met even if **one-time** assistance is provided (e.g., rental arrears, security deposit, etc.).
- The subrecipient must be sure to document compliance with the ESG habitability standards or housing quality standards (whichever is applicable) in the program participant's file.

ESG habitability standards cover 10 areas of review to ensure that the housing is minimally habitable. These 10 areas are:

- ***Structure and materials*** – The structures must be structurally sound to protect residents from the elements and not pose any threat to the health and safety of the residents.
- ***Space and security*** – Each resident must be provided adequate space and security for themselves and their belongings, and an acceptable place to sleep.
- ***Interior air quality*** – Each room or space must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.
- ***Water supply*** – The water supply must be free from contamination.
- ***Sanitary facilities*** – Residents must have access to sufficient sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.
- ***Thermal environment*** – The housing must have any necessary heating/cooling facilities in proper operating condition.
- ***Illumination and electricity*** – The structure must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the structure.

- ***Food preparation*** – All food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.
- ***Sanitary conditions*** – The housing must be maintained in a sanitary condition.
- ***Fire safety*** – There must be a second means of exiting the building in the event of fire or other emergency. Each unit must include at least one battery-operated or hard-wired smoke detector, in proper working condition, on each occupied level of the unit. Smoke detectors must be located, to the extent practicable, in a hallway adjacent to a bedroom. If the unit is occupied by hearing impaired persons, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired person. The public areas of all housing must be equipped with a sufficient number, but not less than one for each area, of battery-operated or hard-wired smoke detectors. Public areas include, but are not limited to, laundry rooms, community rooms, day care centers, hallways, stairwells, and other common areas.

A checklist tool for ensuring that permanent housing standards are met can be found here: https://www.hudexchange.info/resources/documents/ESG-Emergency-Shelter-and-Permanent-Housing-Standards-Checklists.docx

HQS standards can be found under the Rapid Re-Housing documents link found in the Appendix section.

Lead-Based Requirements

If a building or unit was built before 1978, there is a possibility it has lead-based paint. In 1978 the federal government banned consumer uses of lead-containing paint, but some states banned it even earlier. Lead from paint, including lead-contaminated dust, is one of the most common causes of lead poisoning.

Organizations that receive funds for Homelessness Prevention **MUST** comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821–4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851–4856), and they must implement regulations in 24 CFR part 35, subparts A, B, H, J, K, M, and R.

ESG regulations state that a lead-based paint visual assessment must be completed for all units that meet the three following conditions:

- The household living in the unit is being assisted with ESG financial assistance (rent assistance, utilities assistance, utility/security deposits, or arrears).
- The unit was constructed prior to 1978.
- A child under the age of six or a woman who could become pregnant is or may be living in the unit.

These regulations apply regardless of whether a household is staying in an existing unit or moving to a new unit and they must be complied with prior to providing ESG assistance. They must also be complied with (and assessments completed) annually thereafter.

ESG subrecipients are responsible for ensuring that property owners and managers meet the lead-based paint requirements. It may be helpful for subrecipients to think about the requirements in two categories, outlined below.

1. **Disclosure Requirements** - Disclosure requirements are triggered for ALL properties constructed prior to 1978. These requirements require that lessors (property owners or managers) provide tenants with:
   - Disclosure form for rental properties disclosing the presence of known and unknown lead-based paint

     AND
   - A copy of the "Protect Your Family from Lead in the Home" pamphlet .

This requirement actually relates to property owners/managers but sharing this information with program participants (or ensuring they have received it) is an easy thing to do and is recommended for ESG subrecipients.

2. **The Visual Assessment** - Staff may become a HUD-Certified Visual Assessor by successfully completing a 20-minute online training through HUD's website. Depending on the results of the visual assessment, additional steps may be required before assistance can be provided for that unit. The unit needs to be brought into compliance. There are certain exceptions to the rule. Visual assessments are not triggered under the following circumstances:
   - It is a zero-bedroom or SRO-sized unit.
   - X-ray or laboratory testing of all painted surfaces by certified personnel has been conducted in accordance with HUD regulations and the unit is officially certified to not contain lead-based paint.
   - The property has had all lead-based paint identified and removed in accordance with HUD regulations.
   - The client is receiving federal assistance from another program, where the unit has already undergone a visual assessment within the past 12 months (e.g., if the client has a Section 8 voucher and is receiving ESG assistance for a security deposit or arrears). NOTE: In such cases, ESG staff are required to obtain documentation that a visual assessment has been conducted by the agency administering the other assistance. This documentation should be added to the ESG case file.
   - It meets any of the other exemptions described in 24 CFR Part 35.115(a).

If any of the conditions outlined above are met, a staff member simply needs to document the condition and place a copy in the participant's case file.

If a visual assessment reveals problems with paint surfaces, program staff cannot approve the unit for assistance until the deteriorating paint has been repaired. At this point, program staff

must make a decision: 1) work with the property owner/manager to complete needed paint stabilization activities and clearance, 2) work with the household to locate a different (lead-safe) unit, or 3) refer the client to a different program if ESG assistance cannot be provided.

Fair Market Rent and Rent Reasonableness Requirements

Rental assistance may only be provided for housing units for which the total rent does not exceed the fair market rent (FMR) established by HUD, as provided under 24 CFR 982.503. The total rent for the unit must also comply with HUD's standard of rent reasonableness, as established under 24 CFR 982.507. These rent restrictions are intended to ensure that program participants can remain in their housing after their ESG assistance ends.

Rent reasonableness and FMR requirements do not apply when a program participant receives only financial assistance or services under Housing Stabilization and Relocation Services. This includes rental application fees, security deposits, an initial payment of last month's rent, utility payments/deposits, moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, legal services, and credit repair.

Note that this guidance only applies to ESG homeless prevention and Rapid Re-Housing. For guidance on CoC rules regarding FMR and rent reasonableness, please consult the following HUD Exchange resource.

For more information about calculating rent reasonableness and FMR, please review this HUD Exchange Resource.

Rent Reasonableness

The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units.

In many areas, the easiest way to determine rent reasonableness is to use a housing database search engine that will compare units and rents against one another. One option is Michigan Housing Locator. Other local resources may also be used to obtain information, such as market surveys, classified ads, and information from real estate agents. When comparing rent reasonableness, the proposed unit must be compared to three other units.

Fair Market Rent (FMR)

FMRs are gross rent estimates. The U.S. Department of Housing and Urban Development (HUD) annually estimates FMRs for 530 metropolitan areas and 2,045 nonmetropolitan county areas. HUD sets FMRs to assure that a sufficient supply of rental housing is available to program

participants. By law, HUD is required to publish new FMRs at the start of each federal fiscal year on October 1.

Fair Market Rents are updated by HUD every year and can be found online at http://www.huduser.org/portal/datasets/fmr.html

HUD Mega Waiver allows re-evaluations to occur once every *6 months*. Effective April 17, 2020, expires June 22, 2022.

Documentation of Income (Homelessness Prevention)

Documentation of income is required for Homelessness Prevention programs at intake and at each recertification (i.e., every 3 months).

For FY2017, the income limits for ESG (i.e., the 30% Income Limit) can be found on the HUD Exchange website. Do not use HUD's Extremely Low-Income Limit; this is different than the 30% Income Limit used for ESG. These income limits are updated annually (typically in the spring of each year) and take effect as soon as they are announced by HUD.

For clients receiving Homelessness Prevention services, subrecipients must calculate the annual income of the individual or family (as described in 24 CFR 5.609). These regulations are summarized in the following charts.

When calculating income, subrecipients should note the following:

- All adults (persons 18 and over) must have documentation of income (even if there is no income).
- One or more of the below documents must be kept in the client/household file.
- If there is more than one adult in a household, documentation must be provided for each adult household member.
- If an adult has more than one income source or job, each source of income should have its own documentation (e.g., paystubs for employment and TANF benefit letter).

Documentation Options by Income Types				
Income Source	**Include in Income Calculation?**	**Third Party**	**Oral Verification**	**Self-Declaration**
No Income Reported	Yes	Copy of Social Security Statement obtained through http://www.socialsecurity.gov/mystatement/ AND Signed Declaration of No Income	N/A	Client completes Self Declaration of No Income
Wages and Salary	Yes GROSS Pay (Not Net Pay)	Copy of Recent Paystubs OR Signed Letter from Employer (including gross pay amount, frequency, average hours, and contact information)	Staff contacts employer and completes Oral Verification of Income	Client completes Self Declaration of Income
Self-Employment/ Business Income	Yes NET Income (Not Gross Pay)	Copy of most recent federal or state tax return showing net business income	N/A	Client completes Self Declaration of Income
Interest and Dividend Income	Yes GROSS Pay (Not Net Pay)	Copy of most recent interest or dividend income statement OR Copy of most recent federal or state tax return showing interest, dividend, or other net income	N/A	Client completes Self Declaration of Income
Pension/ Retirement Income	Yes GROSS Pay (Not Net Pay)	Copy of most recent payment statement or benefit notice from Social Security Administration (SSA), pension provider, or another source	Staff contacts provider and completes Oral Verification of Income	Client completes Self Declaration of Income
Unemployment Income	Yes GROSS Pay (Not Net Pay)	Copy of most recent unemployment or severance payment statement notice	Staff contacts provider and completes Oral Verification of Income	Client completes Self Declaration of Income
Disability Income	Yes GROSS Pay (Not Net Pay)	Copy of most recent worker's compensation, SSI, or SSDI payment	Staff contacts provider and completes Oral Verification of Income	Client completes Self Declaration of Income
Temporary Assistance for Needy Families (TANF) or other Cash Public Assistance	Yes GROSS Pay (Not Net Pay)	Copy of most recent payment statement or benefit notice	Staff Contacts Provider and completes Oral Verification of Income	Client completes Self Declaration of Income
Alimony, Child Support, Foster Payment	Yes GROSS Pay (Not Net Pay)	Copy of most recent alimony, foster care, child support or other contributions or gift payment statements, notices, or orders	Staff contacts provider, family member, or court, and completes Oral Verification of Income	Client completes Self Declaration of Income
Armed Forces Income	Yes GROSS Pay (Not Net Pay)	Copy of payment statement or other government issued statement indicating income amount	Staff contacts provider and completes Oral Verification of Income	Client completes Self Declaration of Income

The following table describes the types of income that are not counted when calculating gross income for purposes of determining ESG eligibility and documentation.

Income Exclusions by Income Types	
General Category	**Description**
1. Income of Children	Income from employment of children (including foster children) under the age of 18 years.
2. Inheritance and Insurance Income	Lump-sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains and settlement for personal or property losses (except as provided in Pension/Retirement Income).
3. Medical Expense Reimbursements	Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member.
4. Income of Live-in Aides	Income of a live-in aide (as defined in 24 CFR 5.403).
5. Disabled Persons (only in HOME Properties)	Certain increases in income of a disabled member of qualified families residing in HOME-assisted housing or receiving HOME tenant-based rental assistance (24 CFR 5.617).
6. Student Financial Aid	The full amount of student financial assistance paid directly to the student or to the educational institution.
7. Armed Forces Hostile Fire Pay	The special pay to a family member serving in the Armed Forces who is exposed to hostile fire.
8. Self-Sufficiency Program Income	a. Amounts received under training programs funded by HUD.
	b. Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS).
	c. Amounts received by a participant in other publicly assisted programs that are specifically for, or in reimbursement of, out-of-pocket expenses incurred (special equipment, clothing, transportation, childcare, etc.) and which are made solely to allow participation in a specific program.

	d. Amounts received under a resident service stipend. A resident service stipend is a modest amount (not to exceed $200 per month) received by a resident for performing a service for the PHA or owner, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to: fire patrol, hall monitoring, lawn maintenance, resident initiatives coordination, and serving as a member of the PHA's governing board. No resident may receive more than one such stipend during the same period of time.
	e. Incremental earnings and benefits received by any family member for participation in qualifying state or local employment training programs (including training not affiliated with a local government) and training of a family member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives and are excluded only for the period during which the family member participates in the employment training program.
9. Other Non-recurring Income	Temporary, nonrecurring, or sporadic income (including gifts). Sporadic wages or employment income should be included in the income calculation.
10. Reparations	Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era.
11. Income from Full-time Students	Annual earnings in excess of $480 for each full-time student 18 years old or older (excluding the head of household or spouse).
12. Adoption Assistance	Adoption assistance payments in excess of $480 annually per adopted child.
13. Deferred/Lump Sum Social Security & SSI Income	Deferred periodic amounts from SSI and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts.
14. Income Tax and Property Tax Refunds	Amounts received by the family in the form of refunds or rebates under state or local law for property taxes paid on the dwelling unit.
15. Home Care Assistance	Amounts paid by a state agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep this developmentally disabled family member at home.

16. Other Federal Exclusions

Amounts specifically excluded by any other federal statute from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under any program to which the exclusions of 24 CFR 5.609(c) apply, including:

- The value of the allotment made under the Food Stamp Act of 1977;
- Payments received under the Domestic Volunteer Service Act of 1973 (employment through VISTA, Retired Senior Volunteer Program, Foster Grandparents Program, youthful offender incarceration alternatives, senior companions);
- Payments received under the Alaskan Native Claims Settlement Act;
- Income derived from the disposition of funds to the Grand River Band of Ottawa Indians;
- Income derived from certain submarginal land of the United States that is held in trust for certain Indian tribes;
- Payments or allowances made under the Department of Health and Human Services' Low-Income Home Energy Assistance Program;
- Payments received under the Maine Indian Claims Settlement Act of 1980 (25 U.S.C. 1721);
- The first $2,000 of per capita shares received from judgment funds awarded by the Indian Claims Commission or the U.S. Claims Court and the interests of individual Indians in trust or restricted lands, including the first $2,000 per year of income received by individual Indians from funds derived from interests held in such trust or restricted lands;
- Amounts of scholarships funded under Title IV of the Higher Education Act of 1965, including awards under the Federal work-study program or under the Bureau of Indian Affairs student assistance programs;
- Payments received from programs funded under Title V of the Older Americans Act of 1985 (Green Thumb, Senior Aides, Older American Community Service Employment Program);
- Payments received on or after January 1, 1989, from the Agent Orange Settlement Fund or any other fund established pursuant to the settlement in the In Re Agent Orange product liability litigation, M.D.L. No. 381 (E.D.N.Y.);
- Earned income tax credit refund payments received on or after January 1, 1991, including advanced earned income credit payments;
- The value of any child care provided or arranged (or any amount received as payment for such care or reimbursement for costs incurred for such care) under the Child Care and Development Block Grant Act of 1990;
- Payments received under programs funded in whole or in part under the Job Training Partnership Act (employment and training programs for Native Americans and migrant and seasonal farm workers, Job Corps, state job training programs and career intern programs, AmeriCorps);
- Payments by the Indian Claims Commission to the Confederated Tribes and Bands of Yakima Indian Nation or the Apache Tribe of Mescalero Reservation;
- Allowances, earnings, and payments to AmeriCorps participants under the National and Community Service Act of 1990;
- Any allowance paid under the provisions of 38 U.S.C. 1805 to a child suffering from spina bifida who is the child of a Vietnam veteran;
- Any amount of crime victim compensation (under the Victims of Crime Act) received through crime victim assistance (or payment or reimbursement of the cost of such assistance) as determined under the Victims of Crime Act because of the commission of a crime against the applicant under the Victims of Crime Act.

Documentation of Lack of Resources (At Intake)

When providing Homelessness Prevention assistance, subrecipients must demonstrate that the program participant 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 an unsheltered destination. Acceptable documentation generally includes:

- Notice of termination from employment
- Unemployment compensation statement
- Bank statement
- Health-care bill showing arrears
- Utility bill showing arrears
- Other third-party documentation illustrating lack of resources
- Written statement by the relevant third party (e.g., former employer, public administrator, relative)
- Written statement of program staff of phone call or other verbal communication with relevant third-party source (if written documentation is unavailable)

Recertification of Income and Lack of Resources

Homeless Prevention funded through the Detroit ESG and CoC program will conduct programmatic evaluations of all participants every 90 days. The Detroit Continuum has elected to complete income evaluations quarterly for programs funded with both ESG and CoC funds. Regularly scheduled participant evaluations for Homeless Prevention must include:

- Evidence that the program participant does not have an annual income that exceeds 30 percent of median family income for the area, as determined by HUD (see the HUD Income Eligibility Calculator).
- Evidence that program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance.

Calculating Rental and Program Assistance Payments

Subrecipients are expected to take a progressive engagement approach to serving each client. This means that the subrecipients review the needs of the individual or family to determine what level of assistance they need to move forward towards independent living in the community, and no more. Assistance levels should be documented in the file and explained to the client so that they have a full understanding of the support provided by the subrecipient.

This approach should be documented within the subrecipient's operational policies and procedures as part of the written standards, which should be available to the client. Subrecipients should take care to ensure that this approach is uniform and that clients with the same level of needs receive the same level of assistance.

The level of assistance can be adjusted to provide more or less support depending on the client's needs. The level should be adjusted based on ongoing assessments conducted primarily by the case manager.

Subrecipients may decide to enforce a policy where they require client contribution to the rental assistance. Subrecipients may decide to calculate the rental assistance in accordance with section 3(a)(1) of the US Housing Act of 1937 (42 U.S.C. 1437a(a)(1)). Under these regulations, a family's rent payment will be 30 percent of the family's monthly adjusted income or 10 percent of the family's monthly income – whichever is higher.

Leases and Rental Assistance Agreements

Each program participant receiving rental assistance through ESG must have a legally binding, written lease for the rental unit, unless the assistance is solely for rental arrears. The lease must be between the owner and the program participant. Where the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease if the agreement gives the program participant an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented by the owner's financial records, rent ledgers, or canceled checks.

In addition, a rental assistance agreement is required between the subrecipient and the landlord. A subrecipient may make rental assistance payments only to an owner with whom the subrecipient has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided, including the requirements that apply under this section. The rental assistance agreement must provide that, during the term of the agreement, the owner must give the subrecipient a copy of any notice to the program participant to vacate the housing unit or any complaint used under state or local law to commence an eviction action against the program participant.

The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease.

The rental assistance agreement with the landlord must terminate and no further rental assistance payments under that agreement may be made if:

1. The program participant moves out of the housing unit for which the program participant has a lease.
2. The lease terminates and is not renewed.
3. The program participant becomes ineligible to receive ESG rental assistance.

The subrecipient must make timely payments to each owner in accordance with the lease and rental assistance agreement. The subrecipient is solely responsible for paying late payment penalties that it incurs with non-ESG funds.

Section 10: Rapid Re-Housing

Summary

Rapid Re-Housing programs are designed to help those who are experiencing homelessness transition into permanent housing. The primary goal is to stabilize a program participant in permanent housing as quickly as possible and to provide wrap-around services after the family or individual obtains housing. Once a participant is enrolled, Rapid Re-Housing programs should rely heavily on a case management plan to ensure long term stability for program participants. Providers are expected to implement a case management plan that will increase household incomes and/or increase access to mainstream benefits for program participants.

Linkages should also be made to applicable mainstream programs such as SOAR, food stamps, TANF, and other programs as applicable. In most cases, households who have entered a Rapid Re-Housing program have applied for a Housing Choice Voucher through the Michigan State Housing Development Authority. In such cases, ensuring the tenant obtains their vouchers and leases up a unit is of tantamount importance both for that tenant's long-term self-sufficiency and for those in shelter who would benefit from Rapid Re-Housing. This is a key part of the case management.

Rapid Re-Housing Benchmarks and Goals

In an effort to provide the highest quality of service and support to households in crisis the City of Detroit and Detroit CoC have designed the following benchmarks for success and programmatic monitoring for all ESG-funded RRH programs. **These benchmarks are expectations of rapid re-housing providers and will be integrated into ongoing programmatic monitoring:**

- Rapid Re-Housing clients must move into housing within 62 days of program entry
- Percentage of client that exit to a permanent housing destinations;

Determining Rapid Re-Housing Participant Eligibility

Referrals

100% of all referrals to the City of Detroit's Rapid Re-Housing programs will be provided through Detroit's Coordinated Assessment Model (CAM), per the City of Detroit's Rapid Re-Housing Written Standards outlined in this policies and procedures manual.

Rapid Re-Housing Prioritization and Referral Process

Clients who are recommended for Rapid Rehousing are prioritized according to the following factors:

1. Clients who are chronically homeless
2. Clients who are unsheltered
3. Clients who are fleeing domestic violence
4. Clients with the highest VI-SPDAT score

When there are multiple clients with the same score after the above criteria are followed and not enough RRH resources available for all of them, clients will be prioritized in the following order:

a. Family status
    1. Families
    2. Singles Adults

b. Length of time homeless
    1. Longest length of time homeless to shortest length of time

The prioritization factors are subject to change according to community need. Any changes to prioritization factors will be communicated by the Homeless Action Network of Detroit and will be included in the Manual's annual updates.

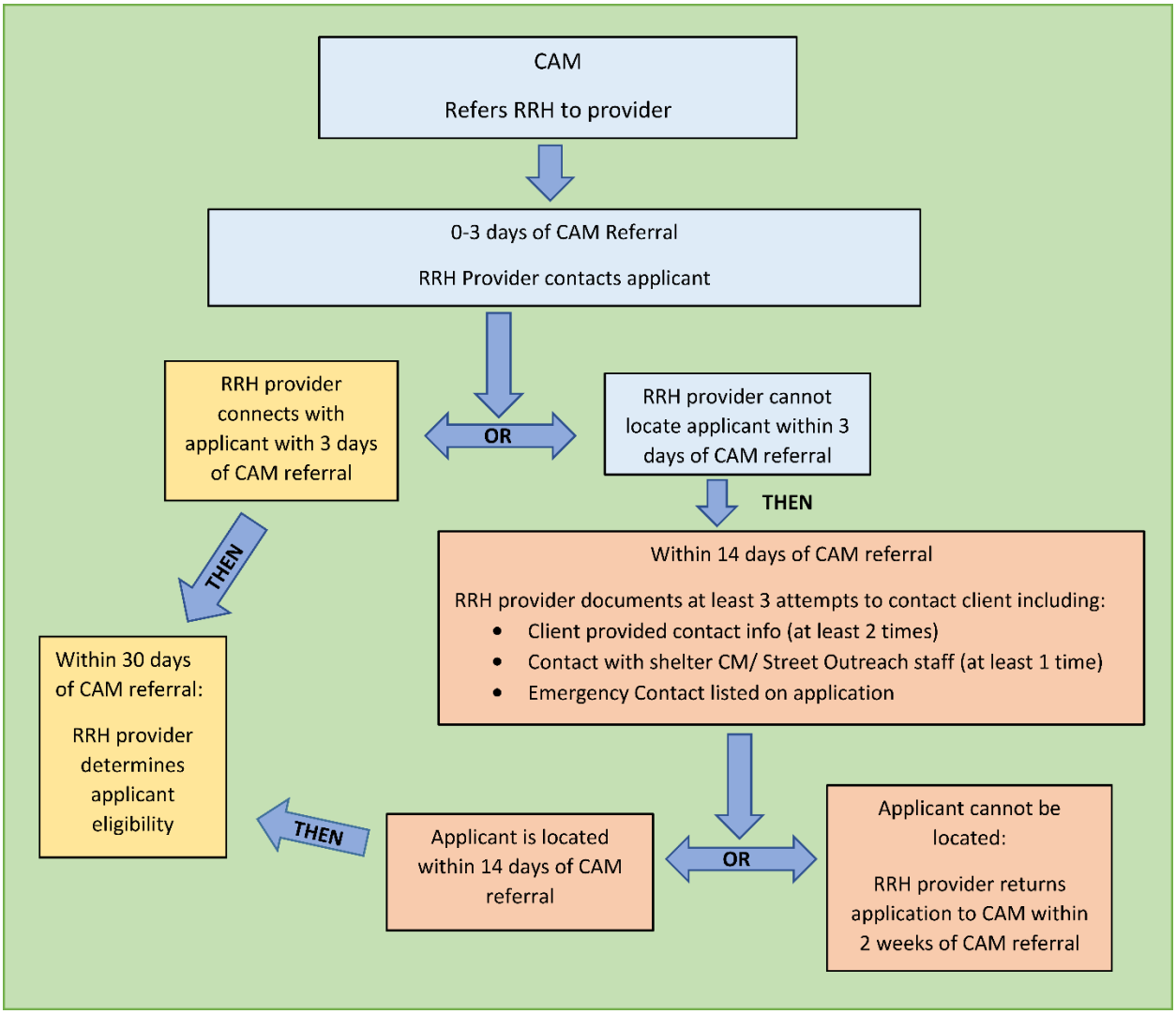
Housing Choice Voucher (HCV) - Security Deposit Only

Participants seeking assistance with Security Deposit Only may be eligible for financial assistance without prioritization or waitlist placement. Applications for Security Deposit Only may be assisted at any time if program funds are available. **Rapid Re-Housing providers should assess the financial status of Security Deposit Only referrals to determine if there is a demonstrated need for this assistance prior to providing the service.**

Referral to Rapid Re-Housing Providers

Referrals are driven by program capacity. As soon as a provider is aware of an opening, they can request a referral from the CAM. Clients will be referred at a ratio of 1 applicant:1 available Rapid Re-Housing opening.

Once a referral is made, the Rapid Re-Housing providers will maintain the following schedule:



Note: For applicants that cannot be located within 14 days, CAM will return the client referral to an inactive list for possible referral at a later date. Returns are sent to the inactive list by providers by marking the client as “declined” (if client was ineligible or refused the project) or “cancelled” (if client was unable to be contacted) in HMIS and noting the specific reason the referral was declined or cancelled. In cases where referrals are returned, attempts at contact should be clearly documented in HMIS.

Clients may remain on the Rapid Re-Housing prioritization list for up to three months, with the opportunity to be reactivated if they reappear. However, reactivated clients will not move directly to the top of the list. Instead, the client referral would be reordered based on their prioritization scores.

Documentation of Eligibility

Clients can be referred via CAM regardless of whether they have all required documentation at time of referral. **The only required referral document is verification of homelessness, which should be uploaded into the client's HMIS record.** If a household is being referred to a RRH program specifically funded to serve persons fleeing domestic violence, documentation of the person's fleeing/attempting to flee domestic violence must be obtained.

- Upon first contact, Rapid Re-Housing provider will utilize HMIS data to verify client is still experiencing homelessness. If HMIS data is unavailable, client is to complete a self-statement of homelessness prior to eligibility determination.

Please note that lack of personal verification documentation shall not prevent entry into the Rapid Re-Housing program. However, it is the expectation of the program providing services to secure third party verification of identity as soon as possible and should be in the client file at time of exit. Timeliness is important because if a client is pulled for any subsidy, it is expected that a household have current identification and other personal verification documents.

The following documents should be collected or obtained when possible to determine Rapid Re-Housing program eligibility:

- Photo identification for Head of Household and all household members age 18 and over. This can be a federal, state or municipally issued form of picture ID.
- Birth Certificates for all children in household- Medicaid card can substitute
- Social Security Cards

If any of the above documents are missing during housing search and placement process, case management should still move forward. Case managers should complete Form 16: Missing Documentation Form. This form provides the opportunity for self-certification of identity. As soon as possible all missing documents are expected to be obtained with support from the case manager.

- Veterans- if eligible for Veteran Services, the CAM will refer to SSVF. If not eligible for Veteran Services- the CAM will follow established prioritization for Rapid Re-Housing.

Rapid Re-Housing Program Referral Refusals

The following guidance outlines the reasons that a referral can be refused by a Rapid Re-Housing service organization:
If a conflict of interest between staff and referral, every effort should be may to reassign the referral to a non- conflict staff person.

- An individual Rapid Re-Housing program may refuse a program referral if the applicant was previously served by the Rapid Re-Housing program and was the program can demonstrate that the client was terminated for violation of health and safety of staff and/or community.
- If there are other extenuating circumstances, providers should reach out to their City of Detroit grant manager and/or HAND via email to request approval to refuse a referral.

Rapid Re-Housing Program Transfers

Rapid Re-Housing Standard: Beginning in January 2020, agencies will no longer be allowed to transfer clients into City of Detroit Rapid Re-Housing programs with the following exceptions:

- MSHDA ESG transfers
- RRH programs that are closing are exempt and therefore are allowed to transfer clients into another City of Detroit RRH program.

Due to eligibility requirements, clients can only be transferred INTO City of Detroit ESG programs. CoC eligibility does not allow for transfers from ESG programs. Program participant initiated transfer requests will undergo processes as outlined in the Appeal Procedures section.

Additional appeal guidance is as follows:

- All transfer requests will be reviewed by the Detroit CoC Rapid Re-Housing Committee. Transfers will be granted on an individual case basis. Transfers will be considered for the following circumstances:
  - Closure of participant's current Rapid Re-Housing Program/provider due to loss of grant dollars (MSHDA, ESG or CoC-funded) prior to household completion of the program.
  - Program does not have the financial resources to meet the client's needs (MSHDA RRH programs only).

The following documentation must be used in the transfer process:

- Must use City of Detroit Rapid Re-Housing transfer form
- Move in date must be tracked in HMIS
- Transfer form must be uploaded into client's HMIS record
- Client must recertify for assistance within 5 business days of transfer regardless of recertification due date

Rapid Re-Housing Referral and HMIS

Definition of terms in HMIS:

- *Accepted*-Client referral accepted (Intake appointment scheduled)
- *Declined*- Client referral declined due to ineligibility, client refusal reason for decline must be provided.
- *Cancelled*- Client was unable to be contacted/ No show for intake appointment (per contact parameter outlined in this document)

Post Referral HMIS Workflow

Below are the expectations for documentation in HMIS after a referral has been requested from CAM:

1. Run HMIS referral report for the current referral period
2. Compare HMIS referral report to referral confirmation e-mail received from CAM
   a. If any discrepancies exist, contact CAM immediately to inform
3. Attempt to contact client within 3 days upon receipt of referral, and document attempts to contact in the "Case Notes" section of the summary page
   a. At least 2 documented contacts to the contact info provided by client
   b. At least 1 documented contact to the shelter CM/street outreach provider

    c. If applicable, at least 1 documented contact to any other contact listed for client in HMIS
4. Once contact with client is made, schedule intake with client and complete the referral outcome as “accepted” in HMIS.
5. If client unable to be contacted after the 3 documented attempts, complete the referral outcome as “cancelled” in HMIS. CAM will run a referral report to note any cancelled referrals, check for documented attempts at contact, and move client to inactive if attempts at contact have been sufficiently made.
6. Upon intake with client, complete a Program Entry in your specific program bin. All clients with accepted referrals should have a Program Entry (noting intake has taken place) within 30 days of referral being made.
    a. If client is found to be ineligible or refuses services at the point of intake:
        i. Complete the referral outcome as “declined” in HMIS
        ii. Complete an entry in the “RRH Outcomes/Client Status” sub-assessment on the summary page with the following information:
            1. RRH Client Status: Client denied for RRH
            2. If Denied-Reason: Select the reason for denial
7. Once intake has been completed and client is enrolled in program, select “yes” next to “client currently in RRH program?” and complete an entry in the “RRH Outcomes/Client Status” sub-assessment on the summary page with the appropriate information reflecting the status of the case.
8. While working with client toward housing (after client enrolled in program):
    a. Document all case notes in the “Goals” section of HMIS under the “Case Plans” tab.
    b. Complete an entry in the “RRH Outcomes/Client Status” sub-assessment on the summary page once per month or as client status changes.

Client Time Limit

NEW

RRH Client Time Limit

As of January 1, 2020 all <u>new clients entering a City of Detroit or CoC RRH program will have the following time limits:</u>

- Limited to 3 months of Housing Search and Placement services

For instance, if a client has an HMIS entry date of 1/1/2020, they must obtain permanent housing prior to 04/01/2020. If additional time is needed, the provider must bring the client case to the RRH Workgroup meeting to review the case and receive peer feedback in an effort to assist with housing placement as well as your City of Detroit program manager. Once housed, a client is allowed up to 24 months of financial assistance.

Client Files

General Program Documentation

Every client who has received a direct service from an ESG subrecipient must have a client file that documents the reason(s) for the assistance. Each file must include the documentation listed below.

Use of Standardized Rapid Re-Housing Forms

In order to ensure continuity across programs and providers, Rapid Re-Housing providers receiving CoC or City of Detroit ESG funds are expected to use the program forms provided in the Addendum B. Although forms can be personalized to include the organization logo, the content should remain the same.

Client File Maintenance

Case Notes and Client Contact Requirements.

All Rapid Re-Housing and Sustainability Coordination activities will be documented in case notes in the HMIS client case file. Case notes will include at minimum:

- Date, location, purpose of the activity;
- Progress on housing goals ;
- Documentation of appointments, meetings, home visits, phone calls, letters with members of the household, landlord and other service providers;
- For contacts with anyone other than a member of the household, a signed release of information must be included in the case file indicating consent for exchange of information;
- Referrals made, including date of referral, name of referral and reason for referral;
- Documentation of minimum monthly contact with the household;
- Indication that the housing service plan has been reviewed and updated a minimum of once per month; and
- Documentation of activities related to program exit.

Required Verifications

Rapid Re-Housing Coordinators are required to verify identity and income of program participants at the time of intake.

Copies of the following verifications are to be included in the case file:

- To verify identify:
    - Proof of social security numbers and documentation of birth dates for all household members
    - Current Government issued photo identification card for all adult household members
    - Birth Certificates for children
- For income verification, any or all of the following as applicable:
    - Most recent paystubs
    - Employment verification if unable to obtain paystubs
    - DHHS award letters for food stamps, MiBridges printout, or TANF

    - SSI/SSDI or Unemployment compensation
    - Child support
    - Other sources of income, W-, 1040

If at entry identity verification documents are not all available, a self-certification of identity must be included in the file. All identity documents should be place in the file when obtained. Reminder, lack of identification should never be a barrier to program entry.

- Required Releases of Information and Agreements
    - Housing Service Plan;
    - HMIS Client Consent (enter information into HMIS & share with agencies);
    - Agency Client Release of Information;
    - Lease – once housed, a copy of the household's signed lease will be included in the file;
    - Proof of rent reasonableness;
    - Notice of Occupancy Rights;
    - Duplication of Benefits form; and
    - Lead notification if applicable

Housing Relocation and Stabilization Services

ESG Eligible RRH Activities

Financial Assistance

ESG funds may be used to pay housing owners, utility companies, and other third parties for the costs listed below. Note that this does not include any direct payments to the applicants/resident.

Security Deposits

ESG funds may pay for a security deposit that is equal to no more than 1.5 months of rent.

Last Month's Rent

If necessary to obtain housing for a program participant, then the last month's rent may be paid from ESG funds to the owner of that housing at the time the owner is paid the security deposit and the first month's rent. This assistance must not exceed one month's rent and must be included in calculating the program participant's total rental assistance (which cannot exceed 24 months during any 3-year period per ESG regulations).

Utilities

No program participant shall receive more than 24 months of utility assistance within any 3-year period.

Utility Deposits

ESG funds may pay for a standard utility deposit required by the utility company including the following utilities:

- Gas
- Electric
- Water
- Sewage

Utility Payments

ESG funds may pay for up to 24 months of utility payments per program participant, per service, including up to 6 months or $2500 of utility payments in arrears, whichever comes first, per service. A partial payment of a utility bill counts as one month. This assistance may only be provided if the program participant or a member of the same household has an account in their name with a utility company or proof of responsibility to make utility payments. Eligible utility services are gas, electric, water, and sewage.

Rental Application Fees

ESG funds may pay for the rental housing application fee if it is a standardized fee charged to all applicants, not just those in an ESG program.

Moving Costs

ESG funds may pay for moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance under housing stabilization services and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.

Stabilization Services

ESG funds may be used to provide specific supportive services to eligible households. These services may be provided with or without the provision of financial or rental assistance, for a maximum of 24 months.

ESG funds may be used to provide the following categories of stabilization services:
Housing Search and Placement

For participants who need assistance finding or securing housing, ESG funds may support the services or activities necessary to assist them in locating, obtaining, and retaining suitable permanent housing. These activities include:

- Assessment of housing barriers, needs, and preferences
- Development of an action plan for locating housing
- Housing search
- Outreach to and negotiation with owners
- Assistance with submitting rental applications and understanding leases
- Assessment of housing for compliance with ESG requirements for habitability, lead-based paint, and rent reasonableness/FMR as described above
- Assistance with obtaining utilities and making moving arrangements
- Tenant counseling.

Housing Stability Case Management

ESG funds may be used to pay the costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing. Funds may also be used to assist a program participant in overcoming immediate barriers to obtaining housing.

Case management assistance cannot exceed 30 days during the period that the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing per the regulations.

Whether paid for with ESG funds or not, housing stability case management should be provided as needed to support households to regain housing stability and link them to other services in the community. The program must, at minimum, develop a plan to assist the program participant to retain permanent housing after the ESG assistance ends. The plan should take into account all relevant considerations, including: the program participant's current or expected income and expenses; other public or private assistance for which the program participant will be eligible and likely to receive; and the relative affordability of available housing in the area.

Case management services are intended to be flexible and respond to the participant's needs, while leveraging other services in the community as much as possible. During their enrollment in the program, participants must meet with a case manager not less than once per month to work towards long-term housing stability.

Mediation

ESG funds may pay for mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the participant from losing permanent housing in which they currently reside.

Legal Services

Component services or activities may include client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling.

- **Eligible Subject Matters**: These include child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal of veterans and public benefit claim denials; and the resolution of outstanding criminal warrants.
- **Eligible Costs**: Eligible costs are the hourly fees for legal advice and representation by attorneys licensed and in good standing with the bar association of the State in which the services are provided, and by person(s) under the supervision of the licensed attorney, regarding matters that interfere with the program participant's ability to obtain and retain housing. Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the program's employees' salaries and other costs necessary to perform the services.

Legal services for immigration, citizenship matters, and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements are also ineligible costs.

Credit Repair

ESG funds may pay for credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.

Detroit RRH Supportive Services

Standard: Rapid Re-Housing programs should not exceed a client household ratio of 1:25.Budgets should reflect appropriate staffing to match these case management ratios and ensure an adequate level of service for households being served in Rapid Re-Housing.

- Rapid Re-Housing programs require a face to face visit with Rapid Re-Housing clients every 30 days
    - At minimum, a home visit should be completed every 90 days
        - Engagement in services is voluntary (except for monthly check in)
        - All attempted contacts should be documented in HMIS
    - Providers should utilize progressive engagement to provide the fullest extent of services necessary to help participants reach identified goals.
- Initial housing plan will be drafted with client at project entry.
    - Housing plans will be updated within 30 days of moving into housing.
- The role of Rapid Re-Housing staff in case management services is as follows:

    - Be an active partner in housing search, providing the level of support necessary to help participant household obtain housing.
    - Understand and help remove barriers to housing
    - Removing barriers to housing
    - Design a housing plan
    - Meet with tenant least once per month
    - Complete home visits at least every 90 days
    - Connect to mainstream resources
    - Employment support
    - Review and update housing plan monthly
    - Connect clients with subsidized housing as appropriate including housing choice and other voucher programs
    - Recertify clients for housing choice vouchers, assist with completing briefing packets, identify other housing units if applicable, and lease up with voucher
- If the Tenant is facing a threat of eviction, the agency should create a Landlord Mediation Plan/Stabilization plan to prevent eviction.
- Income certification should be done on an annual basis based on their date of program entry or if the client loses income.

Expectations for Rapid Re-Housing Staff Training

In order to ensure high quality service provision for those receiving Rapid Re-Housing, agencies administering Rapid Re-Housing programs within the Detroit CoC will document Rapid Re-Housing staff participation in training and stay current on relevant topics, including:

- HUD Regulatory Requirements
- ESG Regulatory Requirements
- Housing First
- Motivational Interviewing
- Fair Housing/ Equal Access/ Housing Law
- Safety Protocol for serving clients in the community, including those fleeing domestic violence
- Client's Rights/Grievance Process
- Trauma Informed Care

During the monitoring process, organizations will be asked to provide the detail of their annual staff training policy and protocol as well as information on the on-boarding process for new employees.

The Housing and Revitalization department has compiled a list of free training materials on some of the topics listed above. This training resource can be found here, using password "housing". This resource also include posttests that should be completed and kept in staff's file for auditing purposes. In addition, we strongly encourage organizations to utilize any and all available training provided via the Continuum of Care to meet these training expectations.

Rental Assistance for Rapid Re-Housing

NEW

Program participants may receive up to 24 months of rental assistance during any 3-year period, according to Federal regulation. This assistance may be short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance.

Rental assistance may be tenant-based or project-based.

NEW

1. Short-term rental assistance is assistance for up to 3 months of rent.
2. Medium-term rental assistance is assistance for more than 3 months but not more than 24 months of rent.
3. Payment of rental arrears consists of a one-time payment for up to 6 months of arrears, including any late fees.

NOTE: Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance or living in a housing unit receiving project-based rental assistance or operating assistance through other public sources (such as Housing Choice Voucher/Section 8 or other public housing).

Documentation of Income - Rapid Re-Housing

Rapid Re-Housing Coordinators are required to verify income of program participants at the time of intake.

For FY2019, income limits for ESG (30% Income Limit) can be found on the HUD Exchange website (do not use HUD's Extremely Low Income Limit; this is different than the 30% Income Limit). These income limits are updated annually (typically in the spring of each year) and take effect as soon as they are announced by HUD.

Subrecipients must calculate the annual income of the individual or family (as described in 24 CFR 5.609). These regulations are summarized in the following charts.
When calculating income, subrecipients should note the following:

- All adults (persons 18 and over) must have documentation of income (even if there is no income).
- One or more of the below documents must be kept in the client/household file.
- If there is more than one adult in a household, documentation must be provided for each adult household member.
- If an adult has more than one income source or job, each source of income should have its own documentation (i.e., paystubs for employment & TANF benefit letter).

Documentation Options by Income Types				
Income Source	**Include in Income Calculation?**	**Third-Party Verification**	**Oral Verification**	**Self-Declaration**
No Income Reported	Yes	Copy of Social Security Statement obtained through http://www.socialsecurity.gov/mystatement/ AND Signed Declaration of No Income	N/A	Client completes Self Declaration of No Income
Wages and Salary	Yes GROSS Pay (Not Net Pay)	Copy of Recent Paystubs OR Signed Letter from Employer (including gross pay amount, frequency, average hours, and contact information)	Staff contacts employer and completes Oral Verification of Income	Client completes Self Declaration of Income
Self-Employment/ Business Income	Yes NET Income (Not Gross Pay)	Copy of most recent federal or state tax return showing net business income	N/A	Client completes Self Declaration of Income
Interest and Dividend Income	Yes GROSS Pay (Not Net Pay)	Copy of most recent interest or dividend income statement OR Copy of most recent federal or state tax return showing interest, dividend, or other net income	N/A	Client completes Self Declaration of Income
Pension/ Retirement Income	Yes GROSS Pay (Not Net Pay)	Copy of most recent payment statement or benefit notice from Social Security Administration (SSA), pension provider, or another source	Staff contacts provider and completes Oral Verification of Income	Client completes Self Declaration of Income
Unemployment Income	Yes GROSS Pay (Not Net Pay)	Copy of most recent unemployment or severance payment statement notice	Staff contacts provider and completes Oral Verification of Income	Client completes Self Declaration of Income
Disability Income	Yes GROSS Pay (Not Net Pay)	Copy of most recent worker's compensation, SSI, or SSDI payment	Staff contacts provider and completes Oral Verification of Income	Client completes Self Declaration of Income
Temporary Assistance for Needy Families (TANF) or other	Yes GROSS Pay (Not Net Pay)	Copy of most recent payment statement or benefit notice	Staff Contacts Provider and completes Oral Verification of Income	Client completes Self Declaration of Income

Cash Public Assistance				
Alimony, Child Support, Foster Payment	Yes GROSS Pay (Not Net Pay)	Copy of most recent alimony, foster care, child support or other contributions or gift payment statements, notices, or orders	Staff contacts provider, family member, or court, and completes Oral Verification of Income	Client completes Self Declaration of Income
Armed Forces Income	Yes GROSS Pay (Not Net Pay)	Copy of payment statement or other government issued statement indicating income amount	Staff contacts provider and completes Oral Verification of Income	Client completes Self Declaration of Income

The following table describes the types of income that are not counted when calculating gross income for purposes of determining ESG eligibility and documentation.

Income Exclusions by Income Types	
General Category	**Description**
1. Income of Children	Income from employment of children (including foster children) under the age of 18 years.
2. Inheritance and Insurance Income	Lump-sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains and settlement for personal or property losses (except as provided in Pension/Retirement Income).
3. Medical Expense Reimbursements	Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member.
4. Income of Live-in Aides	Income of a live-in aide (as defined in 24 CFR 5.403).
5. Disabled Persons (only in HOME Properties)	Certain increases in income of a disabled member of qualified families residing in HOME-assisted housing or receiving HOME tenant-based rental assistance (24 CFR 5.617).
6. Student Financial Aid	The full amount of student financial assistance paid directly to the student or to the educational institution.
7. Armed Forces Hostile Fire Pay	The special pay to a family member serving in the Armed Forces who is exposed to hostile fire.

8. Self-Sufficiency Program Income	a. Amounts received under training programs funded by HUD.
	b. Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS).
	c. Amounts received by a participant in other publicly assisted programs that are specifically for, or in reimbursement of, out-of-pocket expenses incurred (special equipment, clothing, transportation, childcare, etc.) and which are made solely to allow participation in a specific program.
	d. Amounts received under a resident service stipend. A resident service stipend is a modest amount (not to exceed $200 per month) received by a resident for performing a service for the PHA or owner, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to: fire patrol, hall monitoring, lawn maintenance, resident initiatives coordination, and serving as a member of the PHA's governing board. No resident may receive more than one such stipend during the same period of time.
	e. Incremental earnings and benefits received by any family member for participation in qualifying state or local employment training programs (including training not affiliated with a local government) and training of a family member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives and are excluded only for the period during which the family member participates in the employment training program.
9. Other Non-recurring Income	Temporary, nonrecurring, or sporadic income (including gifts). Sporadic wages or employment income should be included in the income calculation.
10. Reparations	Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era.
11. Income from Full-time Students	Annual earnings in excess of $480 for each full-time student 18 years old or older (excluding the head of household or spouse).
12. Adoption Assistance	Adoption assistance payments in excess of $480 annually per adopted child.

13. Deferred/Lump Sum Social Security & SSI Income	Deferred periodic amounts from SSI and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts.
14. Income Tax and Property Tax Refunds	Amounts received by the family in the form of refunds or rebates under state or local law for property taxes paid on the dwelling unit.
15. Home Care Assistance	Amounts paid by a state agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep this developmentally disabled family member at home.

16. Other Federal Exclusions

Amounts specifically excluded by any other federal statute from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under any program to which the exclusions of 24 CFR 5.609(c) apply, including:

- The value of the allotment made under the Food Stamp Act of 1977;
- Payments received under the Domestic Volunteer Service Act of 1973 (employment through VISTA, Retired Senior Volunteer Program, Foster Grandparents Program, youthful offender incarceration alternatives, senior companions);
- Payments received under the Alaskan Native Claims Settlement Act;
- Income derived from the disposition of funds to the Grand River Band of Ottawa Indians;
- Income derived from certain submarginal land of the United States that is held in trust for certain Indian tribes;
- Payments or allowances made under the Department of Health and Human Services' Low-Income Home Energy Assistance Program;
- Payments received under the Maine Indian Claims Settlement Act of 1980 (25 U.S.C. 1721);
- The first $2,000 of per capita shares received from judgment funds awarded by the Indian Claims Commission or the U.S. Claims Court and the interests of individual Indians in trust or restricted lands, including the first $2,000 per year of income received by individual Indians from funds derived from interests held in such trust or restricted lands;
- Amounts of scholarships funded under Title IV of the Higher Education Act of 1965, including awards under the Federal work-study program or under the Bureau of Indian Affairs student assistance programs;
- Payments received from programs funded under Title V of the Older Americans Act of 1985 (Green Thumb, Senior Aides, Older American Community Service Employment Program);
- Payments received on or after January 1, 1989, from the Agent Orange Settlement Fund or any other fund established pursuant to the settlement in the In Re Agent Orange product liability litigation, M.D.L. No. 381 (E.D.N.Y.);
- Earned income tax credit refund payments received on or after January 1, 1991, including advanced earned income credit payments;
- The value of any child care provided or arranged (or any amount received as payment for such care or reimbursement for costs incurred for such care) under the Child Care and Development Block Grant Act of 1990;
- Payments received under programs funded in whole or in part under the Job Training Partnership Act (employment and training programs for Native Americans and migrant and seasonal farm workers, Job Corps, state job training programs and career intern programs, AmeriCorps);
- Payments by the Indian Claims Commission to the Confederated Tribes and Bands of Yakima Indian Nation or the Apache Tribe of Mescalero Reservation;
- Allowances, earnings, and payments to AmeriCorps participants under the National and Community Service Act of 1990;
- Any allowance paid under the provisions of 38 U.S.C. 1805 to a child suffering from spina bifida who is the child of a Vietnam veteran;
- Any amount of crime victim compensation (under the Victims of Crime Act) received through crime victim assistance (or payment or reimbursement of the cost of such assistance) as determined under the Victims of Crime Act because of the commission of a crime against the applicant under the Victims of Crime Act.

Documentation of Lack of Resources at Recertification

When providing Rapid Re-Housing assistance, subrecipients must demonstrate that the program participant 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 an unsheltered destination. Acceptable documentation generally includes:

- Notice of termination from employment
- Unemployment compensation statement
- Bank statement
- Health-care bill showing arrears
- Utility bill showing arrears
- Other third-party documentation illustrating lack of resources
- Written statement by the relevant third party (e.g., former employer, public administrator, relative)
- Written statement of program staff of phone call or other verbal communication with relevant third-party source (if written documentation is unavailable)

Calculating Rental and Program Assistance Payments

Subrecipients are expected to adhere to the following rent payment and schedule guidance:

- Rapid Re-Housing providers should pay 100% the first three month's rent regardless of household income (prorated rent counts as the first month's rent)
- Beginning month four-tenant pays 30% of adjusted income, through to the termination of Rapid Re-Housing programmatic rental assistance.
- Tenants will pay their portion of the rental amount directly to the property owner.

Maximum Rental Assistance Allowed

Subsidy Layering

The City of Detroit will review subsidy layering within Rapid Re-Housing programs to ensure layered funding is in accordance with ESG standards. Approval from City of Detroit ESG program manager is required in writing to provide RRH assistance to a household that already receives any other federal housing subsidy.

Leases and Rental Assistance Agreements

Each program participant receiving rental assistance through ESG must have a legally binding, written lease for the rental unit, unless the assistance is solely for rental arrears. The lease must be between the owner and the program participant. Where the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease if: 1) the agreement gives the program participant an enforceable leasehold interest under state law and the agreement, and 2) rent owed is sufficiently documented by the owner's financial records, rent ledgers, or canceled checks.

In addition, a rental assistance agreement is required between the subrecipient and the landlord. A subrecipient may make rental assistance payments only to an owner with whom the subrecipient has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided, including the requirements listed in this section. The rental assistance agreement must provide that, during the term of the agreement, the owner must give the subrecipient a copy of any notice to the program participant to vacate the housing unit or any complaint used under state or local law to commence an eviction action against the program participant.

The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease. The landlord must agree to enter into the Rental Assistance Agreement every 90 days (upon client recertification).

The rental assistance agreement with the landlord must terminate and no further rental assistance payments under that agreement may be made if:

1. The program participant moves out of the housing unit for which the program participant has a lease
2. The lease terminates and is not renewed OR
3. The program participant becomes ineligible to receive ESG rental assistance.

The subrecipient must make timely payments to each owner in accordance with the lease and rental assistance agreement. The subrecipient is solely responsible for paying late payment penalties that it incurs with non-ESG funds.

Fair Market Rent and Rent Reasonableness Requirements

Rental assistance cannot be provided for a housing unit unless the total rent for the unit does not exceed the fair market rent (FMR) established by HUD, as provided under 24 CFR 982.503. The total rent for the unit must also comply with HUD's standard of rent reasonableness, as established under 24 CFR 982.507. These rent restrictions are intended to ensure that program participants can remain in their housing after their ESG assistance ends.

Rent reasonableness and FMR requirements do not apply when a program participant receives only financial assistance or services under Housing Stabilization and Relocation Services. This includes rental application fees, security deposits, an initial payment of last month's rent, utility payments/deposits, moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, legal services, and credit repair.
Note that this guidance only applies to the Homeless Prevention and Rapid Re-Housing components of ESG. For guidance on CoC rules regarding FMR and rent reasonableness, please consult the following HUD Exchange resource.

For more information about calculating rent reasonableness and FMR, please review this HUD Exchange Resource.

Rent Reasonableness

The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units.

In many areas, the easiest way to determine rent reasonableness is to use a housing database search engine that will compare units and rents against one another. One option is Michigan Housing Locator. Other local resources may also be used to obtain information, such as market surveys, classified ads, and information from real estate agents. When comparing rent reasonableness, the proposed unit must be compared to at least three other units.

Fair Market Rent (FMR)

FMRs are gross rent estimates. The U.S. Department of Housing and Urban Development (HUD) annually estimates FMRs for 530 metropolitan areas and 2,045 nonmetropolitan county areas. HUD sets FMRs to assure that a sufficient supply of rental housing is available to program participants. By law, HUD is required to publish new FMRs at the start of each federal fiscal year on October 1.

Fair Market Rents are updated by HUD every year and can be found online at: http://www.huduser.org/portal/datasets/fmr.html

Inspection Requirements

When available a Housing Inspector will inspect the unit. If a Housing Inspector is not available, a non-assigned case manager will complete the inspection.

HQS will be completed within 7 days of the unit becoming available for inspection (HQS Inspection form).

Subrecipients cannot use ESG funds to help a program participant remain in or move into housing that does not meet the minimum habitability standards under §576.403(c). This restriction applies to all activities under the Homelessness Prevention and Rapid Re-housing components.

Habitability inspections must be conducted by a qualified ESG recipient or subrecipient staff or contractor. Program participants may not conduct inspections.

In addition:

- If an eligible household needs homelessness prevention assistance to remain in its existing unit, the assistance can only be provided if that unit meets the minimum standards.
- If an eligible household needs homelessness prevention or Rapid Re-Housing assistance to move to a new unit, the assistance can only be provided if the new unit meets the minimum standards.
- Minimum standards must be met even if **one-time** assistance is provided (e.g., rental arrears, security deposit, etc.).
- The subrecipient must be sure to document compliance with the ESG habitability standards in the program participant's file.

ESG habitability standards cover 10 areas of review to ensure that the housing is minimally habitable. These 10 areas are:

- ***Structure and materials*** – The structures must be structurally sound to protect residents from the elements and not pose any threat to the health and safety of the residents.
- ***Space and security*** – Each resident must be provided adequate space and security for themselves and their belongings, and an acceptable place to sleep.
- ***Interior air quality*** – Each room or space must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.
- ***Water supply*** – The water supply must be free from contamination.
- ***Sanitary facilities*** – Residents must have access to sufficient sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.
- ***Thermal environment*** – The housing must have any necessary heating/cooling facilities in proper operating condition.
- ***Illumination and electricity*** – The structure must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the structure.
- ***Food preparation*** – All food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.
- ***Sanitary conditions*** – The housing must be maintained in a sanitary condition.
- ***Fire safety*** – There must be a second means of exiting the building in the event of fire or other emergency. Each unit must include at least one battery-operated or hard-wired smoke detector, in proper working condition, on each occupied level of the unit. Smoke detectors must be located, to the extent practicable, in a hallway adjacent to a bedroom. If the unit is occupied by hearing impaired persons, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired person. The public areas of all housing must be equipped with a sufficient number, but not less than one for each area, of battery-operated or hard-wired smoke detectors. Public areas include, but are not limited to,

laundry rooms, community rooms, day care centers, hallways, stairwells, and other common areas.

A checklist tool for ensuring that emergency shelter and permanent housing standards are met can be found here: https://www.hudexchange.info/resources/documents/ESG-Emergency-Shelter-and-Permanent-Housing-Standards-Checklists.docx

Lead-Based Requirements

If a building or unit was built before 1978, there is a possibility it has lead-based paint. In 1978 the federal government banned consumer uses of lead-containing paint, but some states banned it even earlier. Lead from paint, including lead-contaminated dust, is one of the most common causes of lead poisoning.

Organizations that receive funds for Homelessness Prevention **MUST** comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821–4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851–4856), and they must implement regulations in 24 CFR part 35, subparts A, B, H, J, K, M, and R.

ESG regulations state that a lead-based paint visual assessment must be completed for all units that meet the three following conditions:

- The household living in the unit is being assisted with ESG financial assistance (rent assistance, utilities assistance, utility/security deposits, or arrears).
- The unit was constructed prior to 1978.
- A child under the age of six or a woman who could become pregnant is or may be living in the unit.

These regulations apply regardless of whether a household is staying in an existing unit or moving to a new unit and they must be complied with prior to providing ESG assistance. They must also be complied with (and assessments completed) annually thereafter.

ESG subrecipients are responsible for ensuring that property owners and managers meet the lead-based paint requirements. It may be helpful for subrecipients to think about the requirements in two categories, outlined below.

1. **Disclosure Requirements** - Disclosure requirements are triggered for ALL properties constructed prior to 1978. These requirements require that lessors (property owners or managers) provide tenants with:
    - Disclosure form for rental properties disclosing the presence of known and unknown lead-based paint

      AND
    - A copy of the "Protect Your Family from Lead in the Home" pamphlet.

This requirement actually relates to property owners/managers but sharing this information with program participants (or ensuring they have received it) is an easy thing to do and is recommended for ESG subrecipients.

2. **The Visual Assessment** - Staff may become a HUD-Certified Visual Assessor by successfully completing a 20-minute online training through HUD's website. Depending on the results of the visual assessment, additional steps may be required before assistance can be provided for that unit. The unit needs to be brought into compliance. There are certain exceptions to the rule. Visual assessments are not triggered under the following circumstances:
    - It is a zero-bedroom or SRO-sized unit.
    - X-ray or laboratory testing of all painted surfaces by certified personnel has been conducted in accordance with HUD regulations and the unit is officially certified to not contain lead-based paint.
    - The property has had all lead-based paint identified and removed in accordance with HUD regulations.
    - The client is receiving federal assistance from another program, where the unit has already undergone a visual assessment within the past 12 months (e.g., if the client has a Section 8 voucher and is receiving ESG assistance for a security deposit or arrears). NOTE: In such cases, ESG staff are required to obtain documentation that a visual assessment has been conducted by the agency administering the other assistance. This documentation should be added to the ESG case file.
    - It meets any of the other exemptions described in 24 CFR Part 35.115(a).

If any of the conditions outlined above are met, a staff member simply needs to document the condition and place a copy in the participant's case file.

If a visual assessment reveals problems with paint surfaces, program staff cannot approve the unit for assistance until the deteriorating paint has been repaired. At this point, program staff must make a decision: 1) work with the property owner/manager to complete needed paint stabilization activities and clearance, 2) work with the household to locate a different (lead-safe) unit, or 3) refer the client to a different program if ESG assistance cannot be provided.

Termination from Rapid Re-Housing

It is important that Rapid Re-Housing providers effectively communicate termination and grievance procedures to participants and ensure that the procedures are fully understood. Posting the policy on a bulletin board in a common area within the facility is an effective way to ensure that the termination and grievance procedures are available for participants to access at any time. Additionally, all City of Detroit funded Rapid Re-Housing program agencies must include termination policies and procedures in their agency regulations and manuals. If a participant violates ESG program requirements, the subrecipient may terminate assistance in accordance with a formal process established by the subrecipient that recognizes the rights of individuals affected. The subrecipient must exercise judgment and

examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases.

To ensure effective communication for both Rapid Re-Housing agencies and participants, the Detroit CoC requires the following actions prior to program termination:

- At least one face to face meeting with the Rapid Re-Housing participating household discussing program violations;
- A written plan for rectifying program violations including action steps for both Rapid Re-Housing agency staff and program participants;
- If termination is due to an inability to contact the client, the following must be documented in the file:
    - An attempted home visit; AND
    - A letter to client and landlord notifying the intent to terminate rental assistance

In any situation, case notes should demonstrate documented efforts made to contact and connect with client.

Termination under this section does not bar the recipient or subrecipient from providing further assistance at a later date to the same family or individual as long as that individual has not reached the maximum amount of assistance (18 months of assistance over a three-year period). Those seeking further assistance must be homeless and referred through the CAM system, as outlined in Section 3 > Coordinated Entry Systems of this Policies and Procedures Manual.

CoC-funded Rapid Re-Housing programs should refer to 24 CFR § 578.91 for further guidance.

Section 11: HMIS

Summary

All projects funded with City of Detroit ESG and/or Detroit Continuum of Care funds, except those that are specifically for survivors of domestic violence, must participate in the Homeless Management Information System (HMIS). An HMIS is a locally managed database covering all HUD-funded homeless-serving programs within the ESG/Continuum of Care geography. Often other programs use HMIS as well. In Detroit, HMIS is administered by the Homeless Action Network of Detroit (HAND). Data from the HMIS is necessary to meet several federal reporting requirements, including the production of the Consolidated Annual Performance and Evaluation Reports (CAPER) and Annual Performance Report (APR) for each program as well as system-wide reporting such as the Housing Inventory Count (HIC), Longitudinal Systems Analysis (LSA), the Point-in-Time (PIT) count, System Performance Measures (SPMs) and other reports. All programs are expected to abide by the Detroit CoC HMIS Policies and Procedures which are published on HAND'S website.

For additional guidance on HMIS see the HUD exchange resource page.

Please note that domestic violence agencies are exempted and prohibited from entering data into HMIS. Domestic violence agencies must maintain a comparable database that collects similar information in order to provide aggregate data or reporting purposes. Additionally, some legal service providers may determine that entering client data into HMIS violates the attorney/client privilege of their clients. These providers may decide to use a comparable database for records to maintain attorney/client privilege.

Eligible HMIS Activities

ESG subrecipients may use ESG funds to pay for costs related to contributing data to the HMIS system. Subrecipients using these funds must fully comply with HUD's HMIS standards on participation, data collection, and reporting.

The subrecipients may use ESG funds to:

- Purchase or lease computer hardware
- Purchase software or software licenses
- Purchase or lease equipment, including telephones, fax machines, and furniture
- Obtain technical support
- Lease office space
- Pay charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS
- Pay salaries for HMIS operating activities, including:
    - Completing data entry
    - Monitoring and reviewing data quality

    - Completing data analysis
    - Reporting to the HMIS Lead
    - Training staff on use of the HMIS or a comparable database
    - Implementing and complying with HMIS requirements
- Pay costs of staff to travel to and attend HUD-sponsored and HUD-approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act
- Pay staff travel costs to conduct intake
- Pay participation fees charged by the HMIS Lead, if the recipient or subrecipient is not the HMIS Lead.

Section 12: Eligible Participation and Recordkeeping

Introduction to Determining Eligibility for ESG Programs

The following populations are eligible for ESG programs per HUD's homeless definition:

Category 1: Literally Homeless

An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

1. Has a primary nighttime residence that is a public or private place not meant for human habitation;
2. 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
3. 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 2: Imminent Risk of Homelessness

An individual or family who will imminently lose their primary nighttime residence, provided that:

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

Category 3: Homeless Under Other Federal Statutes

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:

1. Are defined as homeless under the other listed federal statutes
2. Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;
3. Have experienced persistent instability as measured by two moves or more during the preceding 60 days; and
4. Can be expected to continue in such status for an extended period of time because of special needs or barriers

Category 4: Fleeing/Attempting to Flee Domestic Violence
Any individual or family who:

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

Eligible populations vary by program type. See *Section 8 > Agency Recordkeeping and Reporting Requirements* for information about which categories are eligible for specific ESG components.

Introduction to Recordkeeping

ESG programs are required to keep both demographic (data elements required by HUD) and service records (e.g., case notes, case plans, bed lists, leases, etc.). Subrecipients are responsible for verifying and documenting the eligibility of all ESG clients prior to providing ESG shelter and/or assistance. This documentation must be maintained in the participant's case file.

Documentation of eligibility is required for all program participants, including those who are literally homeless. However, the absence of third-party documentation should not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or receiving services provided by a victim services provider.

In instances of individuals or families being admitted to emergency shelter, the City of Detroit expects to see certification by the individual or head of household as the primary method of establishing homeless eligibility. In these instances, the City of Detroit would consider a sign-in sheet, with a certification that the individual or head of household seeking assistance is homeless typed at the top, as meeting this standard.

Written Standards Requirements for Subrecipients

Subrecipients must develop policies and procedures to ensure appropriate documentation is obtained and included in clients' files. In accordance with 24 CFR 576.401(a), subrecipients must conduct an initial evaluation to determine each individual or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing. These evaluations must be conducted in accordance with the local CoC's written standards, including the processes for coordinated entry.

Detailed Documentation Options and Types

Specific information about documentation requirements for client files is provided in the sections below.

Intake/Discharge Forms

Subrecipients are required to collect basic demographic data on persons served with ESG funds. This data includes but is not limited to the information outlined in HUD's Homeless Management Information System (HMIS) Data Standards. Subrecipients can review the HMIS Data Standards online at https://www.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual-2017.pdf.

- Clients should be referred to ESG providers/services through Detroit CoC's coordinated entry system.
- Subrecipients should use the intake/discharge forms required by the Detroit CoC posted at http://www.handetroit.org/assessments
- CoC and ESG subrecipients are responsible for ensuring that required intake/discharge forms collect the information needed and are in compliance with HUD regulations/policies.
- Clients have the right to decline to answer any questions on an intake/discharge form or decline to have their data entered into HMIS and/or a comparable database.

The following charts summarize ESG HMIS data collection requirements. Subrecipients should reference the FY2020 HMIS Data Standards and HMIS ESG Program Manual for more information about HMIS requirements.

HUD Universal Data Elements (as of December 2019) ***Required of All ESG Programs***	
3.01 Name	3.10 Project Start Date
3.02 Social Security Number	3.11 Project Exit Date
3.03 Date of Birth	3.12 Destination
3.04 Race	3.15 Relationship to Head of Household
3.05 Ethnicity	3.16 Client Location
3.06 Gender	3.20 Housing Move-in Date
3.07 Veteran Status	3.917 Prior Living Situation
3.08 Disabling Condition	

Program Specific Data Elements (as of December 2019)						
#	**Element**	**Street Outreach**	**Emergency Shelter**	**Prevention**	**Rapid Re-Housing**	**Coordinated Entry**
4.02	Income and Sources	X	X	X	X	X
4.03	Non-Cash Benefits	X	X	X	X	X
4.04	Health Insurance	X	X	X	X	X
4.05	Physical Disability	X	X	X	X	X
4.06	Developmental Disability	X	X	X	X	X
4.07	Chronic Health Condition	X	X	X	X	X
4.08	HIV/AIDS	X	X	X	X	X
4.09	Mental Health Problem	X	X	X	X	X
4.10	Substance Abuse	X	X	X	X	X
4.11	Domestic Violence	X	X	X	X	X
4.12	Current Living Situation	X				X

#	Element	Street Outreach	Emergency Shelter	Prevention	Rapid Re-Housing	Coordinated Entry
4.13	Date of Engagement	X				
4.14	Bed Night					
4.19	Coordinated Entry Assessment					X
4.20	Coordinated Entry Event					X

X = Data collection is required

Case/Service Notes

Subrecipients must document the services provided to program participants using case notes. Case notes must:

- Be legible and securely stored in the client file (either electronically in HMIS or comparable database),
- Sufficiently detail the services provided, including the date, time, type of service, and staff member(s) assisting,
- Spell out the client's housing plan (to leave or avoid shelter) and any goals they might have set for themselves, and
- Include any other relevant information
- Recorded in HMIS under the case plans module.

See *Section 8 > Agency Recordkeeping and Reporting Requirements* for more information about documentation requirements.

HMIS/Comparable Database Release

In compliance with 24 CFR 576.400 (f), all data on all persons served under ESG must be entered into HMIS or a comparable database (if a subrecipient is a Domestic Violence services agency). If data is entered into an HMIS or comparable database where data is shared between providers (also known as an open system), there must be a signed consent to input information into the database. Subrecipients should use the Detroit CoC HMIS release form.

Section 13: Grant Administration

Agency Recordkeeping and Reporting Requirements

Subrecipients must implement appropriate recordkeeping and reporting procedures to document that ESG funds are used in accordance with the requirements. These records must allow the City of Detroit and HUD to determine whether ESG requirements are being met. Subrecipients are required to keep records of the following:

- Coordinated entry system procedures, including written intake procedures developed by the Continuum of Care in accordance with the requirements established by HUD
- Rental assistance agreements and payments, including copies of all leases and rental assistance agreements for the provision of rental assistance, documentation of payments made to owners for the provision of rental assistance, and supporting documentation for these payments including dates of occupancy by program participants
- Current Accounts Receivable and Income Tax Clearances for the City of Detroit
- The monthly allowance for utilities (excluding telephone) used to determine compliance with the rent restriction
- Compliance with the shelter and housing standards in 24 CFR 576.403, including inspection reports
- Types of services provided under ESG, including rental assistance, housing stabilization, and relocation services, and the amounts spent on these services and assistance
- Compliance with the requirements of 24 CFR 576.400 for consulting with the Continuum of Care and coordinating and integrating ESG assistance with programs targeted toward persons experiencing homelessness and mainstream service and assistance programs
- Participation in HMIS or a comparable database
- Records of the source and use of contributions made to satisfy the matching requirement
- Compliance with organizational conflicts-of-interest requirements in 24 CFR 576.404(a), a copy of the personal conflicts of interest policy or codes of conduct developed and implemented to comply with the requirements in 24 CFR 576.404(b), and records supporting exceptions to the personal conflicts of interest
- Compliance with the homeless participation requirements under 24 CFR 576.405
- Compliance with faith-based activities requirements under 25 CFR 576.407
- Compliance with the nondiscrimination and equal opportunity requirements under 24 CFR 576.407(a)
- Compliance with the uniform administrative requirements in 24 CFR part 84
- Compliance with the environmental review requirements, including flood insurance requirements
- Certifications and disclosure forms required under the lobbying and disclosure requirements in 24 CFR part 87

- Compliance with the displacement, relocation, and acquisition requirements in 24 CFR 576.408
- Documentation of how ESG funds were spent on allowable costs in accordance with the requirements for eligible activities
- Receipt and use of program income
- Procurement contracts and documentation of compliance with the procurement requirements
- Written confidentiality procedures to ensure:
  - All personally identifying information of any individual or family who applies for and/or receives ESG assistance will be kept secure and confidential.
  - The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter.
  - The address or location of any housing of a program participant will not be made public, except as provided under a pre-existing privacy policy of the subrecipient and consistent with state and local laws regarding privacy and obligations of confidentiality.
- Program participant records that include the following:
  - Documentation of homelessness or at risk of homelessness status
  - Compliance with regulations related to providing program services in accordance with program components and eligible activities, determining eligibility and amount and type of assistance, and using appropriate assistance and services (see 24 CFR 576.101, 24 CFR 576.106, 24 CFR 576.401(a) and (b), and 24 CFR 576.401 (d) and (e)).
  - Initial consultation form and case notes
  - Intake and certification form
  - Follow-up case manager/client meetings and at least monthly case notes
  - Documented individualized housing and service plan, including a path to permanent housing stability
  - Documentation of financial assistance payment (must include the type of assistance, payee name, client name, check number, and amount paid using ESG funds)
  - Documentation of services and assistance provided to the program participant, including, as applicable, the security deposit, rental assistance, and utility payments made on behalf of the program participant
  - Determinations of ineligibility or termination of assistance (if applicable)
    - For each individual and family determined ineligible to receive ESG assistance, the client file must include documentation of the reason for that determination.
    - Documentation of termination of assistance must comply with the requirements in 24 CFR 576.402.
  - Documentation of the HMIS client ID number or a documented reason why the number is not available

Additional documentation requirements for each type of assistance provided and homelessness category are listed below.

Street Outreach: Category 1 Literally Homeless Clients

1. For applicants who lack a fixed, regular, and adequate nighttime residence, meaning nightly residence may be in: car; park; abandoned building; bus or train station; encampment; airport; camping ground; or hotel and motels paid for by charitable organizations or federal, state or local government programs. For these applicants, any of the following forms of documentation may be used:
   - Written observation by the outreach worker
   - Written referral by another housing or service provider
   - Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter
2. For an individual who is exiting an institution where he/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, any of the following forms of documentation may be used:
   - Written observation by the outreach worker
   - Written referral by another housing or service provider
   - Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter

     and
   - Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution. All oral statements must be recorded by the intake worker, or
   - Written record of intake worker's due diligence in attempting to obtain the evidence described above and certification by the applicant that states he/she is exiting or has just exited an institution where he/she resided for 90 days or less.

Street Outreach: Category 4 Fleeting/Attempting to Flee Domestic Violence Clients

For Victim Service Providers:

1. An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

For Non-Victim Service Providers:

1. An oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the case

worker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified.

2. Certification by the individual or head of household that no subsequent residence has been identified
3. Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

Documenting Emergency Shelter Homeless Status

Eligibility for Emergency Shelter

- All persons served by Emergency Shelter Program services must meet either Category 1 or Category 4 of HUD's definitions of homelessness as defined in 24 CFR 577 at time of acceptance into an emergency shelter program. Refer to the glossary of terms in the beginning of this document for additional guidance on the definitions.
- There is no income limitation for entry into Emergency Shelter.
- While shelters may ask for identification for all members of the households, inability to produce this documentation is **NOT** a barrier for entry or reason for denial.

Documenting Homeless Status

Recipients and subrecipients operating emergency shelters can document homeless status through a certification by the individual or head of household as the primary method of establishing homeless eligibility. In these instances, one method of meeting this standard would be to require households to complete a sign-in sheet, with a statement at the top informing the individual or head of household that by signing, they certify that they are homeless. *Note: Under no circumstances must the lack of third-party documentation prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to receive shelter or services provided by a victim service provider.*

- Shelters **cannot** require the following documentation as a condition of admission: (list include but not limited to.)
  - Proof of citizenship
  - Marriage Certificates
  - Medical and Mental Health diagnosis and medication compliance
  - Vital documents such as ID, birth certificate, or social security cards

Emergency Shelter: Category 1 Literally Homeless Clients

1. For applicants who lack a fixed, regular, and adequate nighttime residence, meaning nightly residence may be in: car; park; abandoned building; bus or train station; airport; camping ground; or hotel and motels paid for by charitable organizations or federal, state or local government programs. For these applicants, any of the following forms of documentation may be used:

- Written observation by the outreach worker
- Written referral by another housing or service provider
- Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter

2. For an individual who is exiting an institution where he/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, any of the following forms of documentation may be used:
   - Written observation by the outreach worker
   - Written referral by another housing or service provider
   - Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter

     and
   - Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution. All oral statements must be recorded by the intake worker, or
   - Written record of intake worker's due diligence in attempting to obtain the evidence described above and certification by the applicant that states he/she is exiting or has just exited an institution where he/she resided for 90 days or less.

Emergency Shelter: Category 4 Fleeing/Attempting to Flee Domestic Violence Clients

For Victim Service Providers:

1. An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

For Non-Victim Service Providers:

1. An oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the care worker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified.
2. Certification by the individual or head of household that no subsequent residence has been identified
3. Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

Documenting Clients At Risk of Homelessness

Homeless Prevention: Category 2 Imminent Risk of Homelessness Clients

1. Verification of at-risk of homelessness status, which may include:
   - A court order resulting from an eviction action notifying the individual or family that they must leave their residence within 14 days after the date of their application for homeless assistance; or the equivalent notice under applicable state law; or a Notice to Quit, or a Notice to Terminate issued under state law.
   - For individuals and families whose primary nighttime residence is a hotel or motel room not paid for by charitable organizations or federal, state, or local government programs for low-income individuals, evidence that the individual or family lacks the resources necessary to reside there for more than 14 days after the date of application for homeless assistance.
   - An oral statement by the individual or head of household that the owner or renter of the housing in which they currently reside will not allow them to stay for more than 14 days after the date of application for homeless assistance.
   - The intake worker must record the statement and certify that it was found credible. To be found credible, the oral statement must either:
     - Be verified by the owner or renter of the housing in which the individual or family resides at the time of application for homeless assistance and documented by a written certification by the owner or renter or by the intake worker's recording of the owner or renter's oral statement; or
     - Be documented by a written certification by the intake worker of his/her due diligence in attempting to obtain the owner or renter's verification and the written certification by the individual or head of household seeking assistance that his/her statement was true and complete.

and

2. Certification that no subsequent residence has been identified

and

3. Self-certification or other written documentation that the individual lacks the financial resources and support necessary to reside there for more than 14 days after the date of application for homeless prevention

Homeless Prevention: Category 4 Fleeing/Attempting to Flee Domestic Violence Clients

For Victim Service Providers:

1. An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

For Non-Victim Service Providers:

1. An oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the care worker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified.
2. Certification by the individual or head of household that no subsequent residence has been identified
3. Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

Homeless Prevention: Additional Limitations on Eligibility

Providers must only serve individuals and families that have an annual income below 30% of annual area median income (AMI).

Homeless Prevention: At Risk of Homelessness

Where the program participant qualified as at-risk of homelessness under paragraph (1) of the definition, the records should reflect that the household's income is below 30 percent of the area median income as evidenced by an income evaluation form containing HUD's minimum requirements and at least one of the following:

1. Source documents for the assets held by the program participant and source documents of the income received over the most recent period for which representative data is available before the date of intake.
   Written statement by the relevant third party (e.g., employer) or the written certification by the recipient's or subrecipient's intake staff of the oral verification by the relevant third party of the income of the program participant received over the most recent period for which representative data are available.
2. Written certification by the program participant of the amount of income the program participant received for the most recent period representative of the income that the program participant is reasonably expected to receive over the 3-month period following the evaluation.
3. Where the program participant qualified as at-risk of homelessness under paragraph (1) of the definition, do the records reflect the program participant's written certification that the program participant has insufficient financial resources and support networks immediately available to attain housing stability and meets one or more of the conditions under paragraph (1)(iii) of the "at risk of homelessness" definition?
4. Where the program participant qualified as at-risk of homelessness under paragraph (1) of the definition, do the records show reasonable efforts to verify that the program participant did not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the homeless definition, as evidenced by one of the following:

a. Source documents (e.g., notice of termination from employment, bank statement, or health care bill showing arrears)
b. A written verification by the relevant third party or written certification by the recipient's/subrecipient's intake staff of the oral verification by the relevant third party; or
c. A written statement by the recipient's/subrecipient's intake staff of the efforts taken to obtain verification through source documents and relevant third parties

5. Where the program participant qualified as at-risk of homelessness under paragraph (1) of the definition, do the records show reasonable efforts to verify that the program participant met one of the seven conditions under paragraph (1)(iii), as evidenced by one of the following:
   a. Source documents that evidence one or more of the conditions.
   b. A written statement by the relevant third party or the written certification by the recipient's/subrecipient's intake staff of the oral verification by the relevant third party that the applicant meets one or more of the conditions
   c. A written statement by the recipient's or subrecipient's intake staff that the staff person has visited the applicant's residence and determined that the applicant meets one or more of the conditions. If a visit is not feasible or relevant to the determination, a written statement by the recipient's/subrecipient's staff describing the efforts taken to obtain the required evidence.

      NOTE: The conditions are: (1) has moved because of economic reasons two or more times during the 60 days immediately preceding the application for assistance; (2) is living in the home of another because of economic hardship; (3) 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 the application for assistance; (4) lives in a hotel or motel and the cost is not paid by charitable organizations, federal, state, or local government programs for low-income individuals; (5) lives in an SRO or efficiency apartment in which there resides more than two persons, or lives in a larger housing unit in which there resides more than 1.5 persons per room, as defined by the U.S. Census Bureau; (6) is exiting a publicly-funded institution, or system of care, or (7) otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness as identified in the ESG recipient's Consolidated Plan.

6. Where the program participant qualified as at-risk of homelessness under paragraph (2), do the records reflect that the program participant met the definition of homeless under one of the following Federal statutes, as evidenced by a certification of the child's or youth's homeless status by the agency or organization responsible for administering assistance under the statute:
   d. Runaway and Homeless Youth Act
   e. Head Start Act
   f. Subtitle N of the Violence Against Women Act of 1994

g. Section 330 of the Public Health Service Act
h. The Food and Nutrition Act of 2008
i. Section 17 of the Child Nutrition Act of 1966

7. Where the program participant qualified as at-risk of homelessness under paragraph (3), the records should reflect that the child or youth in the household qualified as homeless under subtitle B of title VII of the McKinney-Vento Homeless Assistance Act, as evidenced by certification of the child or youth's homeless status from an agency or organization that administers assistance under the Education for Homeless Children and Youth Program. **NOTE:** Under this paragraph of At-Risk of Homelessness the certification need only specify that the child meets the definition under subtitle B of title VII of the McKinney-Vento Homeless Assistance Act.

Rapid Re-Housing: Category 1 Literally Homeless Clients

1. For applicants who lack a fixed, regular, and adequate nighttime residence, meaning nightly residence may be in: car; park; abandoned building; bus or train station; airport; camping ground; or hotel and motels paid for by charitable organizations or federal, state or local government programs. For these applicants, any of the following forms of documentation may be used:
   - Written observation by the outreach worker
   - Written referral by another housing or service provider
   - Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter
2. For an individual who is exiting an institution where he/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, any of the following forms of documentation may be used:
   - Written observation by the outreach worker
   - Written referral by another housing or service provider
   - Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter

     and
   - Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution. All oral statements must be recorded by the intake worker, or
   - Written record of intake worker's due diligence in attempting to obtain the evidence described above and certification by the applicant that states he/she is exiting or has just exited an institution where he/she resided for 90 days or less.

Rapid Re-Housing: Category 4 Fleeing/Attempting to Flee DV

For Victim Service Providers:

3. An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

For Non-Victim Service Providers:

1. An oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the care worker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and
2. Certification by the individual or head of household that no subsequent residence has been identified; and
3. Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing. Documentation of compliance with the applicable requirements for providing service and assistance (24 CFR 576.104) includes:
   - Monthly case manager meeting case notes
   - Documented individualized plan to help retain permanent housing after the ESG assistance ends
   - Verification of income – not required for Rapid Re-Housing until recertification at the one-year mark

Period of Record Retention

Records related to each fiscal year of ESG funds must be retained for the greater of five years or the period specified below:

- Documentation of each program participant's qualification as a family or individual at risk of homelessness or as a homeless family or individual as well as other program participant records must be retained for 5 years **after** the expenditure of all funds from the grant under which the program participant was served.
- Where the ESG funds that are used for the renovation of an emergency shelter exceed 75 percent of the value of the building before renovation, records must be retained until 10 years after the date that ESG funds are first obligated for the renovation.
- Where the ESG funds that are used to convert a building into an emergency shelter exceed 75 percent of the value of the building after conversion, records must be retained until 10 years after the date that ESG funds are first obligated for the conversion.

Access to Records

Subrecipients must comply with the requirements for access to records which establish that HUD, the HUD Office of the Inspector General, and the Comptroller General of the United

States, or any of their authorized representatives, and the City of Detroit, must have the right of access to all documents, papers, or other records kept by the subrecipient relevant to the ESG award. This also includes access to subrecipients' staff for the purpose of interview and discussion of documents. These rights last as long as the records are retained.

Conflict of Interest

For the procurement of goods and services, subrecipients must comply with the codes of conduct and conflict of interest requirements under 2 CFR 200.112 . For all other activities, the ESG Interim Rule establishes that any employee, agent, consultant, officer, or elected or appointed official of the subrecipient who has functions or responsibilities related to the ESG program and its activities or who is in a position to participate in a decision-making process or gain inside information about the program, may not:

- Obtain a financial interest or benefit from an ESG-assisted activity
- Have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity
- Have a financial interest in the proceeds derived from an ESG-assisted activity, either for themselves or those with whom they have family or business ties.

This applies during the person's tenure with the program and for the one-year period following their tenure.

In addition, a subrecipient may not condition any type or amount of ESG assistance on an individual's or family's acceptance or occupancy of emergency shelter or housing owned by the City of Detroit, the subrecipient, or a parent or subsidiary of the subrecipient. For individuals or families occupying housing that is owned by the subrecipient (or a parent or subsidiary of the subrecipient), the subrecipient may not complete the initial evaluation required under 24 CFR 576.401 (i.e., the evaluation of program participant eligibility and needs) or administer homelessness prevention assistance.

Exceptions

Subrecipients may submit a written request for an exception to the conflicts of interest provisions. This request should be submitted to the City of Detroit, which will then submit the request to HUD. HUD will only consider the exception request if all of the following documentation is submitted:

- A disclosure of the nature of the conflict, accompanied by an assurance that there has been public disclosure of the conflict and a description of how the public disclosure was made
- An opinion of the subrecipient's and City of Detroit's attorneys that the interest for which the exception is sought would not violate state or local law.

Please see 24 CFR 576.404 for more information.

Non-Discrimination, Equal Opportunity, and Affirmative Outreach

Subrecipients are required to ensure that ESG-funded services are made available to all on a nondiscriminatory basis, and to publicize this fact. This availability must reach persons of any particular race, color, religion, sex, age, familial status, national origin, or disability within the agency's service area. If it is unlikely that the procedures that the subrecipient intends to use to make known the availability services will reach persons of any particular race, color, religion, sex, age, familial status, national origin, or disability who may qualify for those facilities and services, the subrecipient must establish additional procedures that ensure that those persons are made aware of the services. Subrecipients must take appropriate steps to ensure effective communication with persons with disabilities including, but not limited to adopting procedures that will make available to interested persons information concerning the location of assistance, services, and facilities that are accessible to persons with disabilities. Consistent with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, subrecipients are also required to take reasonable steps to ensure meaningful access to programs and activities for limited English proficiency (LEP) persons.

Uniform Administrative Requirements

The requirements of 24 CFR Part 84, except 24 CFR 84.23 (i.e., cost sharing or matching) and 24 CFR 84.53 (i.e., property standards) do not apply, and program income is to be used as the nonfederal share under 24 CFR 84.24(b). These regulations include allowable costs and non-federal audit requirements. See 24 CFR Part 84 for more information.

Environmental Review Responsibilities

ESG activities are subject to environmental review by HUD under 24 CFR Part 50. The City of Detroit is responsible for supplying all available, relevant information necessary for HUD to perform for each property any environmental review required by 24 CFR Part 50. The City of Detroit is also required to carry out mitigating measures required by HUD or select an alternate eligible property. HUD may eliminate from consideration any application that would require an Environmental Impact Statement (EIS).

The City of Detroit and ESG subrecipients, including any contractors of subrecipients, may not acquire, rehabilitate, convert, lease, repair, dispose of, demolish, or construct property for an ESG project, or commit or expend HUD or local funds for eligible ESG activities, until HUD has performed an environmental review under 24 CFR Part 50. The City of Detroit must have received HUD approval of the property prior to any ESG activities beginning.

The City of Detroit's application for an environmental review is in Appendix D.

Davis-Bacon Act

The Davis-Bacon Act (40 U.S.C. 276a to 276a-5) does not apply to the ESG program.

Procurement of Recovered Materials

The City of Detroit and its contractors must comply with Section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act. The requirements of Section 6002 include procuring only items designated in guidelines of the Environmental Protection Agency (EPA) at 40 CFR part 247 that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the items exceeds $10,000 or the value of the quantity acquired by the preceding fiscal year exceeded $10,000; procuring solid waste management services in a manner that maximizes energy and resource recovery; and establishing an affirmative procurement program for procurement of recovered materials identified in the EPA guidelines.

Section 504 of the Rehabilitation Act of 1973

Subrecipients must comply with Section 504 of the Rehabilitation Act of 1973 (The Act). Pursuant to the requirement of The Act, subrecipients must ensure that no otherwise qualified disabled person shall, solely by reason of their disability, be excluded from the participation in, be denied the benefits of, or be subject to discrimination (including discrimination in employment) in, any program or activity that receives or benefits from Federal financial assistance. The subrecipient must also ensure that requirements of The Act shall be included in the agreements with and be binding on all of its subrecipients, contractors, subcontractors, assignees, or successors.

Faith-Based Activities

Organizations that are religious or faith-based are eligible, on the same basis as any other organization, to receive ESG funds. Neither the federal government nor a state or local government receiving funds under ESG shall discriminate against an organization based on the organization's religious character or affiliation.

Faith-based organizations are eligible to receive ESG funds per 24 CFR 576.406 under the following conditions:

1. Organizations that are directly funded under the ESG program may not engage in inherently religious activities, such as worship, religious instruction, or proselytization as part of the programs or services funded under ESG. If an organization conducts these activities, the activities must be offered separately, in time or location, from the programs or services funded under ESG and participation must be voluntary for program participants.

2. Any religious organization that receives ESG funds retains its independence from federal, state, and local governments, and may continue to carry out its mission, including the definition, practice, and expression of its religious beliefs, provided that the religious organization does not use direct ESG funds to support any inherently religious activities (such as worship, religious instruction, or proselytization). Among other things, faith-based organizations may use space in their facilities to provide ESG-funded services, without removing religious art, icons, scriptures, or other religious symbols. In addition, an ESG-funded religious organization retains its authority over its internal governance and the organization may retain religious terms in its organization's name, select its board members on a religious basis, and include religious references in its organization's mission statements and other governing documents.
3. An organization that receives ESG funds shall not, in providing ESG assistance, discriminate against a program participant or prospective program participant based on their religion or religious beliefs.
4. ESG funds may not be used for the rehabilitation of structures to the extent that those structures are used for inherently religious activities. ESG funds may be used for the rehabilitation of structures only to the extent that those structures are used for conducting eligible activities under the ESG program. Where a structure is used for both eligible and inherently religious activities, ESG funds may not exceed the cost of those portions of the rehabilitation that are attributable to eligible activities in accordance with the cost accounting requirements applicable to ESG funds. Sanctuaries, chapels, or other rooms that an ESG-funded religious congregation uses as its principal place of worship, however, are ineligible for funded improvements under the program. Disposition of real property after the term of the grant, or any change in use of the property during the term of the grant, is subject to government-wide regulations governing real property disposition (see 2 CFR 200).
5. If the recipient or a subrecipient that is a local government voluntarily contributes its own funds to supplement federally-funded activities, the subrecipient has the option to segregate the federal funds or commingle them. However, if the funds are commingled, this section applies to all of the commingled funds.

Lobbying Requirements

Subrecipients must include Lobbying Policies in their program policies and procedures that summarize the community or subrecipient's policy on employee contacting or communicating with a federal agency, member of congress, or congressional staff member as an advocate for funding of any program.

Financial Management and Procurement Requirements

Subrecipients must comply with applicable requirements outlined in 2 CFR 200 and based on their grant award year and contract.

Section 14: Program Monitoring

Summary

The City of Detroit has a duty to ensure that all ESG funds are spent in a timely, correct fashion according to the federal and state regulations that guide the ESG program. Monitoring has proven an effective tool for improving subrecipient performance, establishing community best practices, and avoiding problems and challenges that subrecipients may encounter.

Subrecipients will be monitored by the City of Detroit on a regular basis. They may also be monitored by HUD, either as a part of the recipient, the City of Detroit, being monitored, or they may be directly monitored by HUD.

The City of Detroit seeks to ensure that monitoring is as positive of an experience as it can be. The overall goal is to improve the provision of service for people who experience homelessness, within the constraints of the regulations. The City of Detroit undertakes not to use the monitoring compliance process in a punitive, negative way.

Monitoring Process

Each year, the City of Detroit will draft a plan to determine which agencies and programs will be monitored. This determination is based on determined financial and programmatic risk. If an agency or program is among those the City of Detroit determined to be monitored, the City of Detroit will reach out and inform that agency at least three weeks before they begin the monitoring process. (In rare circumstances, such as responding to a serious complaint, the City of Detroit reserves the right to monitor with no notice.) The City of Detroit Housing and Revitalization Department conducts all programmatic monitoring. Based on the City of Detroit HRD's established policies for homeless programs, programmatic monitoring will occur on site at least bi-annually. The determination of frequency is based on assessed risk. Financial monitoring is completed by the City of Detroit Office of the Controller.

On-Site Monitoring

On-site monitoring involves staff from the City of Detroit working on-site at the agency or project. The monitoring will usually involve some or all of the following activities:

- Interviews with staff and residents that either work at or use the project
- A review of financial and project materials related to the project
- A physical inspection of the project.

On-site monitoring can take anywhere from half a day to several days, depending on the activities reviewed and the size of the project.

If the City of Detroit monitors on-site, City staff will need access to a quiet space (such as a table and chair) where they can work and review materials, as well as a confidential space where they can speak to managers, staff, and clients.

Remote Monitoring

Remote monitoring can take place at any time during the year. The City of Detroit reserves the right to request materials that include but are not limited to: client files, program resources, policies and procedures, and financial back up materials.

If the City of Detroit requests that the program or agency submits materials to be reviewed remotely, the agency will need to submit the information to the City of Detroit electronically. It is the agency's responsibility to submit data in a secure, encrypted way or to agree with the City of Detroit on a mutually acceptable way to transmit the data that redacts all personal identifiable information.

The Monitoring Visit

The City of Detroit will communicate with an agency at least 3 weeks in advance to give them time to make preparation for the visit. The agency has the right to request a different date, if the agency or program has another significant event at that time. The City of Detroit will follow up with an email outlining the monitoring schedule, the activities to be reviewed, and the names of the City staff who will be conducting the monitoring visit.

The City of Detroit may request information from a program or agency in advance of the visit as part of its preparation. This will help staff to have a fuller understanding of the goals and objectives of the program.

Entrance Conference

At the beginning of the monitoring visit, the City of Detroit staff will conduct an entrance conference with agency and program managers and staff. The purpose of this meeting will be to communicate the objectives, scope, and focus of the monitoring visit. During this meeting City of Detroit staff will:

- Explain how the monitoring visit will be conducted
- Establish key points of contact within the agency that can assist during the monitoring
- Confirm activities that will be reviewed and make arrangements for files and materials to be made available
- Identify key staff and clients to be interviewed
- Schedule a physical inspection of the building (as needed)

During the Visit

The City of Detroit staff will spend the monitoring visit carrying out the activities listed above. During the visit access to a private room and internet will be needed. They will evaluate the data that an agency provides and draw conclusions. The conclusions will be supported by documentation, particularly if these conclusions become findings or concerns.

During the visit, the City of Detroit reserves the right to request additional files, materials, or people to be interviewed.

Exit Conference

At the end of the visit, City of Detroit staff will meet with the agency to provide a short, verbal summary of the conclusions that they have drawn.

An agency will have the opportunity to comment on any problem areas that City of Detroit staff found during the visit, so that program staff have the opportunity to correct perceived deficiencies or noncompliance at the time of the visit.

After the Monitoring Visit

Within 30 days, the City of Detroit will send a letter summarizing the monitoring activities and any conclusions that may have been drawn from these.

This will include one or more of the following:

- That there were areas of concern (deficiencies in performance that are not based on a regulatory or statutory requirement, but nevertheless should be brought to the attention of the agency)
- That there were findings (deficiencies that are not in compliance with regulatory or statutory requirements)
- That there were no areas of concern or findings noted during the monitoring visit

If the letter outlines a finding, it will also include a summary of the reason that the City of Detroit has classified the issue as a finding, and how the agency or program can correct the finding. The City of Detroit will also establish a timeframe on when the corrective action should be completed by.

It is important to remember that until the agency can conclusively show that each finding has been corrected, and that the City of Detroit has acknowledged this in writing, that each finding will remain open. This may have implications for future applications for ESG funding.

Appendices Index

Rapid Rehousing and Prevention Forms can be found here.

Appendix A: ESG Match Documentation Form

Appendix B: Client Rights Document

Appendix C: Self-Statement of Homelessness

Appendix D: Environmental Review Form

Appendix E: Housing Plan

Appendix F: Severe Weather Policy

Appendix A

City of Detroit
Emergency Solutions Grant Program
ESG Match Documentation Form

Prior to the release of the last payment of the grant award, ESG subrecipients must demonstrate they have met their match requirement. Upon receipt of this form and supporting documentation, your final payment will be released.
Organization:
Program Year:
CPA Number:
ESG Award Amount: $
CDBG Homeless Public Service Award Amount: $
Gap in ESG and CDBG Awards (if applicable): $
Source of Gap Funding:

Attach supporting documentation for match funding. By signing below, you acknowledge that your organization met the required 100% match for ESG funding.

Signed: _____ Date: _____
Subrecipient's Authorized Representative

Reviewed and approved by ESG project Manager

Signed: _____ Date: _____

Appendix B

YOUR RIGHTS

EVERY CLIENT HAS THE RIGHT TO:

SAFETY
to receive services without fear of harm to your personal well-being

INFORMATION
to know about the services available, what you can expect and what is expected of you

PRIVACY
to have a private environment when discussing your personal situation with staff

CONFIDENTIALITY
to be assured that any personal information will remain confidential unless you have given permission for it to be shared

CHOICE
to be able to make your own decisions , for staff to explain the impact of your choices on the services you receive and for staff to respect your decisions

GRIEVANCES
can be made without fear of retaliation

Updated November 2019

RESPECT
to be treated with dignity, empathy, courtesy, consideration and attentiveness

FAIRNESS
to not face discrimination based on race, religion, ethnicity, national origin, sexual orientation, gender identity, age, political beliefs, or disability.

FAMILIES
are allowed to stay together without requiring proof of relationship; children under 18 should never be separated from their parents, regardless of gender identify

COPIES OF DOCUMENTS
that you sign or contain your personal information will be provided to you upon request

ACCESS
to shelter regardless of disability

If you feel your rights have been violated, see the back page for the grievance process.

Detroit Homeless Response System Consumer Grievance Procedure

Policy: All households served by a homeless program in Detroit have the right to file a complaint or grievance if they feel they have been treated unjustly by any program or agency.

Procedure:
Staff at your program should explain to you what your rights are and how the grievance procedure works. If you feel your rights have been violated follow these steps:

step 1

File a grievance with the program you are staying in. If you don't know how to file a grievance, ask for the Recipients Right's Advisor to help you. If the agency doesn't have a Recipients Right's Advisor ask for a Program Manager or Director to explain the process to you. After following this process, if you do not feel like your grievance has been resolved **OR** if you believe you will be retaliated against for making a grievance, **move on to step two.**

step 2

Submit a formal grievance to Homeless Action Network of Detroit (HAND) following the process outlined below:

- **Complete the grievance form and submit to HAND** . This form should be made available to you at your program or you can request a copy from HAND. If you need help submitting the form, please contact the CoC Coordinator at HAND at (313) 964 -3666 x108 .
- HAND will first contact you **via phone** to gather more information. HAND will also reach out to the agency for more information. A Grievance Review Committee who is not connected to your program will review all the information gathered and make a decision within **twenty (20) business days of the review.** If you are satisfied with the outcome, your grievance will be closed. If not, move on to step 3.

step 3

If you are not satisfied with response to your grievance you will be invited to participate in a **case conference with staff from HAND and the Grievance Review Committee.** If you are satisfied with the outcome, your grievance will be closed. If not you can then file a grievance with the appropriate funding body, following the grievance procedure of that body (such as HUD, MDHHS, etc.). A member of the Grievance Committee can assist you with figuring out that process, if needed.

Updated November 2019

***If you would like this document in Spanish or Arabic, please email your City of Detroit Contract Manager.**

Appendix C

Self- Certification of Homelessness

Instructions: This self-statement certification may be used when a household is seeking entry to shelter and lacks connections with service providers to obtain a third party verification of homelessness. This self-statement should be maintained in the client file.

Applicant Name (Head of Household):_____ HMIS ID #:_____

( ) Individual or ( )Family (check one) If family, please complete box below:

Household Member Name	Relationship to the Head of Household

I and any family members listed are homeless as indicated below and have no appropriate housing options available and lack the financial resources and support networks needed to obtain immediate housing.

Please add any additional comments here:

I certify that the above information is correct.

Client Signature: _____Date: _____

I reviewed the above statement with the client.

Staff Signature: _____ Date: _____

Agency: _____

Appendix D

CITY OF DETROIT AS RESPONSIBLE ENTITY
HOUSING AND REVITALIZATION DEPARTMENT
ENVIRONMENTAL REVIEW REQUEST FORM

Submit one form for each project for which review is requested. This form is required and must be complete before any review can begin. Incomplete forms will be sent back to the applicant.

GENERAL PROJECT INFORMATION		
Project Name (if applicable):		**Date Requested:**
Project Address(es): (include a map if available)	**Project Parcel ID #s:**	
HUD Funding Program (HOME, CDBG, ETC.):		**Funding Year:**
Project Contact Name	**Title**	**Department/Agency**
Phone	**email**	

PROJECT DESCRIPTION
Provide a <u>DETAILED</u> written description of the project: Include type of project (new construction, rehabilitation, etc.); maximum anticipated scope of the proposal (even if it isn't solidified yet); size of the project (area coverage, number of units, population served, etc.); physical description of existing and/or proposed new buildings; timeframe for implementation

PURPOSE AND NEED
Describe what is being done and why it is necessary, trends that may happen in the absence of the project:
List the project beneficiaries (ex: affordable housing, public service, mixed use housing):

FUNDING SOURCES AND AMOUNTS
List all funding sources and development partners (private, federal, state, local, etc.):

TIMING REQUIREMENTS
Provide proposed project timelines (ex: closing/construction start/contract):

Please submit this completed form and required documentation to:

Penny Dwoinen, Environmental Review Officer
City of Detroit Housing and Revitalization Department
dwoinenp@detroitmi.gov 224-2933

Appendix E

Individualized Housing Assessment Plan

Section A. General Information

Today's Date Shelter Entry Date: VI-SPDAT Score:

Name: Primary Phone Number:

Alternative Contact Information:

Mailing Address: Current Household Size:

Total Family Size: Age of family members: Veteran?

Section B. Resident History/Life Experience

Fleeing from, living in a domestic violence situation or domestic violence survivor?

Monthly Income Amount and Sources:

Healthcare coverage:

Work History: HS Diploma/GED?, Any college or training courses? History of employment?
Barriers to employment?
Would client like an employment referral?

Substance abuse history?

Diagnosed with a chronic illness or health condition?

Diagnosed with a mental illness?

Criminal background history (misdemeanor, felony, CSC/ when occurred, Pending legal cases, probation/parole, warrants, PPO,
Evictions (If so, When?):

Credit History: Debt, ability to budget, bankruptcy, and foreclosures?

Life Skills: Daily activities, can cook, clean, difficult completing any issues?

Transportation: Primary means of getting around, (valid driver license)?

Social Connections: do you have any social supports/ people you can call for favor?

Involved in any community activities?

What other services are you engaged in?

Section C. Housing History and Plan
What type of housing assistance are you trying obtain? Plan to exit/discharge from shelter:

Supporting documentation the client currently has:

Do you have utility balances that may present a barrier to turning utilities on? If yes, please give more detail:

Documents the client needs to obtain for housing:
Plan of action:

Step	Timeline	Responsible Parties

Appendix F

Detroit Continuum of Care
SEVERE WEATHER POLICY

Overview

The Detroit Continuum of Care Severe Weather Policy is a protocol to engage, transport, and shelter people experiencing unsheltered homelessness in the city of Detroit, Hamtramck, Highland Park who might otherwise remain outdoors during periods of severe weather. Remaining outdoors during severe weather conditions can lead to serious and life-threatening conditions and require the Homelessness Response System to respond accordingly.

This policy outlines the minimum requirements for the emergency response providers, which include outreach, shelter, and warming center providers. The Continuum of Care (CoC) and the City of Detroit acknowledge that severe weather conditions can be challenging for all, including unsheltered individuals, current shelter clients, and providers.

Severe weather is broken down into three categories, Code Blue for severe cold weather and Code Red for severe hot weather. All categories are defined below and were informed by the NOAA. These situations allow clients to remain indoors during the day and prohibits terminations from emergency shelter during severe weather to ensure the safety of all.

The dedication of and implementation of this protocol by shelter, warming center, and outreach providers is crucial to keeping people safe and alive during these times. Any questions can be directed to the City of Detroit's Homelessness Manager.

Definitions

Emergency Response Provider- Shelter, outreach, and warming center providers funded through state or federal grants.

Community Provider- The network of organizations that provide services, formally or informally to individuals experiencing homelessness who do not receive federal funds for this purpose.

Code Blue- A weather emergency notice is issued when:

- The temperature drops to **20 degrees Fahrenheit or below,** including National Weather Service calculations for wind chill values between the hours of 4pm and 8am; and/or
- **Ice storms** or **freezing rain** is expected; and/or
- 6 or more inches of **snow** is expected

Code Red- A weather emergency notice is issued when:

- A heat index of **105 degrees** is predicted for two hours or more by the National Weather Service

City of Detroit Responsibilities

The City of Detroit has accepted responsibility for confirming that providers are aware of severe weather situations and that each entity takes appropriate action per this policy. During episodes of severe weather, the City of Detroit will notify providers via email that the severe weather policy is in effect. Notification will be provided in three parts via email:

1. First, the City will issue a warning notification stating that severe weather is expected in 2-3 days.
2. Second, the City will notify providers when the severe weather policy is in effect.
3. Finally, the City will email providers when the severe weather declaration is lifted.

When appropriate, additional cooling centers and/or non-traditional warming centers (e.g. churches) operated by community providers will be sent via email to all system partners. The notification will include the address, phone number, and contact persons for each location to ensure effective coordination.

At the City of Detroit's discretion, additional outreach efforts and/or emergency shelter beds may be mobilized. In this circumstance, the City of Detroit will ensure that the greater community receives notification of the weather emergency, shelter locations, and who to contact to engage with outreach services.

Emergency Response Provider Responsibilities

Emergency response providers play a crucial role in keeping people safe during severe weather. To ensure appropriate mobilization, each provider must designate a contact person who will notify staff at their respective programs of the declaration of severe weather and ensure implementation of this policy. If this contact person changes, it is the agency's responsibility to notify the City of Detroit's Homelessness Solutions Manager of this change immediately. The expectations of each sector of emergency response providers are outlined below.

Emergency Shelter Providers

- Curfews must be lifted to ensure that households can access emergency shelter throughout the night.
- During severe weather shelters must not exit individuals, either voluntarily or involuntarily, out of shelter. If after the 90 day time frame has expired and there are not other shelter bed(s) available for the household, the agency would be required to keep the household until after the severe weather has passed. If a household wants to leave

shelter, staff must ensure that the household has transportation and a safe place to stay for the night. This can be accomplished by providing bus tickets, making sure the household can call family/friends or transportation services, or providing direct transportation.

- No shelter suspensions or bans can be carried out during severe weather – clients who have been banned can return to the shelter for the night in question, if necessary. This would most likely occur if a client presented at shelter during the weekend or after CAM business hours. Clients can be referred to CAM the following day for a different shelter bed. If a client becomes physically violent, staff are encouraged to call the police
- Per existing protocol, any household that presents at shelter outside of CAM business hours is allowed to stay at the shelter for that night, as long as space permits. If a shelter does not have space during severe weather, the agency must either a) let the household remain at the shelter, utilizing an air mattresses or another arrangement for overnight accommodations; or b) secure another shelter bed and arrange for transportation to that shelter.
- Shelter residents cannot be asked to leave the building during the day when Severe Weather is in effect. Residents must be allowed to remain indoors, but does not necessarily have to include access to the shelter area. Other options could include the lobby, dining hall, or community room.

Warming Center Providers

Warming Centers provide vital shelter space during the winter months, mid-November through March. Warming Centers must adhere to the same responsibilities as Emergency Shelter (as listed above), with the additions of the first two bullets below:

- Warming centers are required to take as many clients as possible, within the Building, Safety Engineering and Environmental Department (BSEED) restrictions.
- Anyone in need of a shelter bed can walk into a warming center without undergoing a complete HMIS intake for the night in question. If the household wishes to stay in the warming center for additional nights staff can complete at intake at that time.

Outreach Providers

- Between November and March, outreach providers are required to establish and share a calendar to provide after-hours coverage seven nights a week.
- Navigation-Only teams will be expected to support Street Outreach efforts during Severe Weather.
- Providers must make contact with all unsheltered individuals on their caseload and/or other individuals that they are aware of to ensure their safety and bring them into shelter.
- Providers must coordinate with each other regarding unsheltered individuals who are refusing shelter in order to provide continuous engagement and ensure their safety.
- Outreach providers may be called to work additional shifts or during days or times outside their normal work schedule in order to provide the most coverage possible. To prepare for this, providers are encouraged to build in additional funds for salary or to make budget modifications if necessary.