



HOMELESSNESS SOLUTIONS POLICES & PROCEDURES MANUAL



City of Detroit

Housing and Revitalization Department

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Contents

- Section 1: General Information and Background 7
 - Purpose of this Document 8
 - How to Use This Document..... 8
 - Values 8
 - ESG Overview 9
 - Homelessness Response System Coordination 9
 - Frequently Used Terms 10
- Section 2: Funding Process and Requirements 11
 - Overview 12
 - Grant Awards and Spending Requirements 12
 - City of Detroit Subrecipients 13
 - HUD Requirements 14
 - Match Requirements..... 15
- Section 3: Coordinated Entry System..... 18
 - Overview 19
 - About the CAM 19
 - CAM Access 19
 - CAM Liaisons 20
 - Shelter CAM Policies 20
 - Requesting a VI-SPDAT or Full SPDAT Re-assessment 21
 - CAM Coordination Related to MSHDA Housing Choice Vouchers (HCV) 21
 - Client Grievance Process 22
- Section 4: Federal Regulations 25
 - Overview 26
 - Equal Access Rule 26
 - Violence Against Women Act (VAWA)..... 27
 - Americans with Disabilities Act (ADA) Compliance..... 28
 - Reasonable Accommodations/Modifications 28
 - Federal Fair Housing Act 29
 - Client Confidentiality and Privacy Policies 29
 - Homeless Management Information Systems (HMIS) Requirements 31
- Section 5: Overview of ESG Program Components..... 32

Overview	33
Requirements for All Program Components	33
Minimum Period of Use	34
Eligible Program Participants	34
Termination of Assistance	35
Section 6: Street Outreach	36
Overview	37
Priorities	37
Program Components	37
Eligibility and Target Population	38
Eligible Activities	39
Performance Benchmarks	42
Severe Weather Policy	42
Client Files and Record Keeping	42
Section 7: Emergency Shelter	45
Overview	46
Priorities	46
Program Components	46
Eligibility and Target Population	47
Eligible Activities	49
Performance Benchmarks	55
Shelter Habitability and Lead Requirements	55
Required Policies and Procedures	57
Intake Procedures for Emergency Shelters	70
Community Standards	72
Client Files and Record Keeping	72
Section 8: Rapid Rehousing	77
Overview	78
Priorities	78
Program Components	78
Eligibility and Target Population	79
Eligible Activities	79
Referrals	83

Supportive Services.....	87
Calculating Rental and Program Assistance Payments.....	87
Termination of Assistance.....	90
Performance Benchmarks.....	90
Client Files and Recordkeeping.....	91
Section 9: Homelessness Prevention.....	95
Overview.....	96
Priorities.....	96
Eligibility and Target Population.....	96
Referrals.....	97
Eligible Activities.....	97
Evaluation of Program Participant Eligibility and Needs.....	102
Termination of Assistance.....	103
Client Files.....	104
Calculating Rental and Program Assistance Payments.....	108
Section 10: Homeless Management Information System (HMIS).....	111
Overview.....	112
Eligible Activities.....	112
Data Quality.....	113
Section 11: Eligible Participation and Recordkeeping.....	114
Overview.....	115
Homeless Categories.....	115
Record Keeping Requirements.....	116
Documenting Homeless Status.....	118
Period of Record Retention.....	125
Access to Records.....	125
Written Standards Requirements for Subrecipients.....	125
Detailed Documentation Options and Types.....	126
Section 12: Grant Administration.....	130
Conflict of Interest.....	131
Non-Discrimination, Equal Opportunity, and Affirmative Outreach.....	131
Uniform Administrative Requirements.....	132
Environmental Review Responsibilities.....	132

Davis-Bacon Act	132
Procurement of Recovered Materials	132
Section 504 of the Rehabilitation Act of 1973	133
Faith-Based Activities	133
Lobbying Requirements	134
Financial Management and Procurement Requirements	134
Implementing Assistance Under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA)	134
Section 13: Program Monitoring.....	137
Overview	138
Monitoring Process	138
Section 14: Appendices.....	141
Appendix I: Frequently Used Terms and Definitions.....	142
Appendix II: Grant Closeout and ESG Match Documentation.....	150
Appendix III: Documenting Income for RRH and Prevention	152
Appendix IV: Rental Unit Inspection Requirements.....	156
Appendix V: Lead-Based Paint Requirements	159
Appendix VI: Severe Weather Policy.....	161
Appendix VII: ESG Minimum Habitability Standards.....	164
Appendix VIII: Prevention Screening Tool	166
Appendix IX: Detroit CoC Emergency Shelter Community Standards.....	170

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 Homelessness Solutions funding. Homelessness Solutions funding can include Emergency Solutions Grant (ESG), Community Development Block Grant (CDBG), American Rescue Plan Act (ARPA), HOME-ARP, General Funds, or any other funding source provided through the City of Detroit's Homelessness Solutions Division. 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 CDBG or other funding source matching funds through the Homelessness Solutions 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 Rehousing Policies and Procedures](#)
- [Housing Choice Voucher Policies and Procedures](#)
- [Policies and Procedures Manual for Emergency Solutions Grants Coronavirus \(ESG-CV\) Homeless Programs](#)

How to Use This Document

Subrecipients and contractors 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.

Values

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

1. Housing is a basic human need; providers must ensure that housing options offered to clients are accessible, safe, and affordable;
2. 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;
3. 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;
4. 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;
5. 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;
6. Clients have a right to privacy, confidentiality, and to be informed of their rights (especially related to their records, program termination, grievances, etc.);
7. 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.

ESG Overview

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 Rehousing 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.

Homelessness Response System Coordination

In accordance with [24 CFR 576.400\(b\)](#) the City and its ESG subrecipients are required to participate in the Detroit Continuum of Care (CoC) and the local Coordinated Entry System (see Section 3 for additional information on Coordinated Entry). System coordination is a vital part in a community's plan to prevent and end homelessness. The Homeless Action Network of Detroit (HAND) is the lead agency for the Detroit CoC. ESG subrecipients must participate and be a voting member in General Membership meetings. For additional information on the Detroit CoC, please visit <https://www.handetroit.org/continuum-of-care>.

Coordination with local programs that are targeted to those experiencing homelessness and mainstream resources includes (but not limited to): the John D. Dingell Department of Veterans Affairs Medical Center, Detroit Public Schools (and other local school systems), Federally Qualified Health Centers (FQHC), the State of Michigan- including Michigan State Housing Development Authority (MSHDA) and Michigan Department of Health & Human Services (MDHHS), Head Start, mental health providers, substance use providers, and workforce development.

Frequently Used Terms

This manual uses many terms and abbreviations throughout it. Please reference Appendix I for definition of terms used.

Section 2: Funding Process and Requirements



Overview

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 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.

All grant expenses must be in compliance with [2 CFR 200, Subpart E](#) and [24 CFR 576](#). Expenses must be allowable, allocable, and reasonable.

Additional information about obligation, expenditure, and payment requirements can be found in [24 CFR 576.203](#).

Invoicing Process

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.
- Submit electronic copy of the reimbursement packages to the SmartSheet link provided at the beginning of the grant year

Important: 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 Supplier 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.

Supplier Portal Contact Information:

- Supplier Portal Information and tools: www.detroitmi.gov/supplier
- Supplier Portal Hotline and Assistance with creating invoices: 313-224-1500
- Supplier portal questions: procurementinthecloud@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 payment process, please contact your City of Detroit program manager directly.

City of Detroit Subrecipients

Eligible Subrecipients

Private, nonprofit, tax-exempt organizations that plan to provide Street Outreach, Emergency Shelter (including Warming Centers), Rapid Rehousing, and Homelessness Prevention services are eligible to apply for ESG funds. Organizations must be in good standing with HUD and the City of Detroit to be considered for funding.

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 Appendix I: Frequently Used Terms for more information),
- Provide a client grievance process that upholds 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.

Subrecipient 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 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](#), [Equal Access to Housing Final Rule](#) (including [Family Separation](#)), and the [Americans with Disabilities Act](#) regulations and must be reflected in their agency policies and procedures. **All providers are required to establish organizational policies to ensure that all federal laws are followed in the administration of ESG services.**

Additional 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 Contributions

The matching requirement may be met by one or both of the following:

1. Cash contributions: Cash expended to pay for allowable costs incurred by the recipient or a subrecipient.
2. 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. Non-cash

contributions must be valued in accordance with the requirements of [2 CFR 200.306\(d-i\)](#) and [24 CFR 576.201\(c\)](#).

3. 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.

All match contributions must be allowable under [2 CFR Part 200, Subpart E](#). Match requirements can be found at [24 CFR § 576.201](#)

Subrecipient Match 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).

Match requirements can be found at [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](#).

Section 3:

Coordinated Entry System



Overview

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). All ESG, CDBG, and CoC funded programs are required to use the CoC's coordinated entry system.

About the CAM

The CAM operates Access Points throughout the City of Detroit in addition to a phone line that serves 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, utilize a shelter prioritization process, to ensure 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 VI) to ensure clients understand minimum shelter expectations and how to file a grievance if they believe they've been mistreated.

CAM Access

During CAM Operating Hours:

- 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

After CAM Operating Hours/Weekends/Holidays

- If a household presents directly to an Emergency Shelter or Warming Center at these times, the provider should exhaust all efforts to allow the household inside for the night and then connecting to CAM over the phone or referring to a CAM Access Point the following morning.
- If an Emergency Shelter or Warming Center is at capacity, they should also attempt to divert the household to other shelters or agencies for possible placement if they have space available.

Street Outreach

- Street Outreach team conducts CAM intake, documentation, and shelter/warming center placement.
- Street Outreach team assists with transportation to CAM and/or emergency shelter

- Street outreach teams’ goal is to connect unsheltered residents to the homelessness response system. Methods of connection vary depending upon time of day.
 - During standard business hours street outreach teams connect residents to CAM to be assessed and referred to shelter, if shelter is available.
 - Outside of standard business hours street outreach teams attempt to facilitate shelter placement. If shelter placement is unavailable teams provide information about CAM and the process for following up on the next business day.
- Street outreach teams use HMIS and internal record keeping mechanisms to maintain connections with and track any residents that refuses to contact CAM and or refuses shelter. Street outreach attempts to complete the standardized assessment tool with the resident.

CAM Liaisons

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

- Actively participate in applicable Provider Workgroup meetings.
- Serve as the 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 provider workgroup
- If interested, nominate themselves (or other CAM Liaisons) to serve on the CAM Governance Committee.

Shelter CAM Policies

All shelters must adhere to the below policies related to CAM services:

1. **Referrals:** 100% of shelter clients **must be referred through CAM**. If CAM did not serve as the initial intake point (example: the client walked in to shelter after CAM hours), it is the shelter’s responsibility to connect the client to CAM the next business day. This ensures clients in shelter get immediate access to housing services they may qualify for.
2. **Services:** Shelter providers and the CAM 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. -
3. **VI-SPDAT:** All clients are expected to have a **VI-SPDAT score in HMIS**, completed by CAM staff within the last 6 months. For clients without an updated assessment, shelters are responsible for coordinating a connection to CAM to ensure a linkage to services.

4. **Daily bed counts:** 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 by 9 A.M. daily through this electronic form- [CAM Bed Reporting](#).
5. **Bed holds:** 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.
6. **Bans:** Clients who are temporarily 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. Shelter bans are not to exceed six months in duration.

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.

Re-Assessment Process:

- Staff requesting a new VI or Full SPDAT should complete the “Request for Reassessment Form” on <https://camdetroit.org/for-providers/>
 - Include detailed information on what has changed or was not discussed at the time of the original VI or Full SPDAT
 - 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.
- CAM staff will review the submitted request and any supporting documents provided to make a determination within 3 business days of submission.
- Once the determination is made, CAM will notify the requesting staff of the outcome via email and attach the request form with comments.
- If the reassessment is approved, CAM will assign an Intake Specialist to reassess the client.
- CAM staff will notify the submitting staff of the outcome.

CAM Coordination Related to MSHDA Housing Choice Vouchers (HCV)

MSHDA HCVs are dependent upon the State of Michigan’s internal budget and availability of federal resources. These resources ebb and flow in our system and as such may not be available at any given time. If MSHDA HCVs are available, it is expected that these resources follow the current CAM prioritization. All providers are responsible for assisting their clients with signing up and obtaining vouchers, as applicable.

Client Grievance Process

Overview

All households served by agencies within the Detroit Continuum of Care (CoC) have the right to file a grievance if they feel their rights have been violated by any program or agency within the Detroit CoC. Agencies are required to establish an internal client grievance process and to ensure it is available and accessible to clients. This internal policy should include a formal review process that seeks resolution with the client and prevents retaliation from the agency. This process should also be made available in a confidential for the client. If a client is not satisfied with the agency's response or fears retaliation, the CoC has an established process.

The CoC Lead Agency, Homeless Action Network of Detroit (HAND), receives all grievances that are filed outside of an agencies internal process. HAND will investigate grievances that are filed outside of City funding (CoC funded programs). Grievances against City funded programs are investigated by the City of Detroit and may be elevated to the Michigan Department of Health and Human Services (MDHHS) Emergency Shelter Program (ESP) funder if necessary. If resolution cannot be found internally for grievances filed against CoC funded and/or City funded agencies, they will then be reviewed by the CoC Board Grievance Review Committee (GRC) to vote on whether they believe the grievance should be decided as "Substantiated" or "Not Substantiated". City of Detroit staff are not voting members in this committee, only elected board members. For more information regarding the CoC Grievance process and to find the form to file a grievance please visit HAND's website, found [here](#).

Grievance Investigation Procedure

Once City of Detroit staff have received a grievance, they will initially see if any resolution can be found at the agency level. If resolution is not attainable, City staff will begin contacting the appropriate parties to collect all relevant information to be presented to the GRC. City staff will contact the client within 3 business days or less of receiving the grievance. City staff also work simultaneously with the investigation to ensure the client has been directed to the appropriate resources as necessary. City staff will take immediate action if necessary upon receiving a grievance, instead of waiting until the grievance can be presented to the committee for follow-up action. Agencies have 5 business days to respond to the City's request for materials regarding the grievance. **Failure by the agency to respond to the grievance notice from the City will result in an automatic decision of substantiating the grievance**

Once all materials, statements, documents, etc. are received from the client and the agency that the grievance is filed against, City staff will bring the grievance to the GRC for deliberation. Committee members vote on whether to substantiate or not substantiate the grievance based on the information presented. Whether the decision is substantiated or not, committee members can recommend actions for the agency to take based upon the nature of the grievance. If a grievance is substantiated, the committee assigns a severity level (Table 1) which can trigger various responses by the City.

Mild Severity	Medium Severity	Extreme Severity
<p>Any grievance that impacts a clients daily living activities that the agency is responsible for, and/or minor building conditions concern.</p> <p>Examples</p> <ol style="list-style-type: none"> 1. Non-life threatening building conditions/cleanliness 2. Not providing essential supplies (such as soap, bed linens, etc.) 3. Poor food quality and/or not being served at timely hours of the day 4. Did not clearly explain policies, procedures, and/or rules to the client 	<p>Any grievance that impacts the dignity and worth of the client served and/or hinders a clients progress towards self-sufficiency and achieving their housing goals.</p> <p>Examples</p> <ol style="list-style-type: none"> 1. Agencies actions violated a programmatic policy or procedure, but not a regulatory requirement 2. Agency provided the client with inadequate case management_ 3. Situation resulted in the client losing a viable housing opportunity or other important document retrieval (ID, social security card, etc.) 4. Reports of client mistreatment by staff (verbal, physical, etc.) 	<p>Any grievance that is life threatening and/or goes against federal regulations.</p> <p>Repeated and/or themes of grievances at the same agency of any severity level.</p> <p>Failure to respond to City's notice of grievance filed against the agency.</p> <p>Examples</p> <ol style="list-style-type: none"> 1. Situation resulted in client being unlawfully exited from shelter or denied entry into shelter 2. Agency actions violated a HUD regulation 3. Agency violated the CoC's Equal'-Discrimination policy (I.e. persons with disabilities, gender, LGBTQ+, race, etc.)

Table 1: Grievance Severity Scale

City Responses to Grievances

Regardless of the severity assigned by the GRC, City staff will collect the recommendations given by the committee and send them to the agency. From the date the agency received the recommendations, they will be required to respond to City staff within 30 business days. The following are possible, but not limited to, responses that the City may take after grievances have been processed by the committee.

Mild Severity Grievances:

- Contacting the provider’s leadership and/or case manager to ensure an adequate and supportive response has been provided to the client. A meeting will be held if necessary.
- Requesting most recent inspection report from the City of Detroit Health Department (DHD), Fire Department, City of Detroit Buildings, Safety Engineering, and Environmental Department (BSEED), and/or any other necessary entities
- Quotes for building repairs and/or pictures of completion of building repairs provided to City of Detroit staff

Medium Severity Grievances:

- Training provided to agency staff and completion of training documentation sent to City staff
- Increased number of scheduled and/or unscheduled visits to site
- Updating of agency policies and procedures

Extreme Severity Grievances:

- Corrective Action Plan(s) Issued
- Contract Violation(s) Issued
- Possible loss of funding

Grievance Appeals

If the client is not satisfied with the Grievance Review Committee's response to the grievance, they will be given the opportunity to file an appeal or request a Case Conference. The Case Conference process is outlined [here](#). If an agency is not satisfied with the GRC's response to the grievance, they will be given the opportunity to file an appeal. If an appeal is filed, the GRC will provide a written response to the appeal within twenty (20) business days. Please note, appeals processes for ESP funded agencies may be different than what is outlined in this policy.

If you wish to file a grievance against an agency with the Detroit CoC, please click [here](#) and/or email or mail to the address below:

Email: coc.coordinator@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 to CAM [here](#).

Section 4:

Federal Regulations



Overview

All Homelessness Solutions subrecipients are required to follow applicable federal regulations for their program type.

Equal Access Rule

Homelessness Solutions 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.

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: LGBTQ Homelessness](#)
- [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 to Housing Final 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.

Violence Against Women Act (VAWA)

The VAWA, [24 CFR 576.409](#), prohibits the denial or termination of assistance or eviction solely because an applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking applied upon enactment of VAWA 2013 on March 7, 2013.

As provided under [24 CFR 5.2005\(a\)](#) each subrecipient that determines eligibility for or administers ESG rental assistance is responsible for ensuring that the notice and certification form described under [24 CFR](#)

[5.2005\(a\)\(1\)](#) is provided to each applicant for ESG rental assistance and each program participant receiving ESG rental assistance at each of the following times:

1. When an individual or family is denied ESG rental assistance;
2. When an individual or family's application for a unit receiving project-based rental assistance is denied;
3. When a program participant begins receiving ESG rental assistance;
4. When a program participant is notified of termination of ESG rental assistance; and
5. When a program participant receives notification of eviction.

To ensure the safety of tenants housed in CoC and Emergency Solutions Grant (ESG) funded programs, including tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA), Detroit CoC and ESG funded programs allows tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's current unit to another unit.

All ESG funded programs must adhere to the [Detroit CoC Emergency Transfer Plan](#) that was approved by the Detroit CoC Board of Directors on September 10, 2018.

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.

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 accommodations 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.

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](#).

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 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



Overview

In accordance with [24 CFR 576](#), Homelessness Solutions funds must be used for the following activities:

1. Street Outreach,
2. Emergency Shelters (including Warming Centers)
3. Rapid Rehousing
4. Homelessness Prevention
5. Data Collection

In order to ensure comprehensive services to those in housing crisis, these funds are to be used in combination with other federal, state, and local funds as part of a community-wide response to homelessness.

The City of Detroit's Homelessness Solutions funding helps to build the infrastructure of the coordinated entry system. In keeping with the City's commitment to streamline homeless services through coordinated entry, we intend to award a portion of our total allocation to coordinated entry. As we are not the primary funder of this activity, the City will follow the community's decision-making process for coordinated entry funds. We understand that there is a robust evaluation of our coordinated entry system and its processes, including established performance metrics. If a new organization becomes the lead for coordinated entry, we will provide a commitment of grant funds to support their needs within the scope of what is allowable.

Requirements for All Program Components

Subrecipient Agreement Requirements

All organizations awarded funding through the NOFA process will enter into a subrecipient agreement with the City of Detroit. As such, all subrecipients must adhere to all sections of the agreement. All organizations will be required to fully participate in financial audits as required by [2 CFR 200](#), program monitoring to ensure compliance with program regulations, and submit timely monthly and/or quarterly performance reports.

Monitoring

The Housing & Revitalization Department (HRD) is the City of Detroit department responsible for ensuring compliance with all regulatory and statutory requirements relative to ESG and CDBG Homeless Public Service funding. Therefore, it is incumbent upon the HRD staff to ensure Emergency Solutions Grant funds or those specifically delineated as match are spent on time and in compliance with all regulatory, statutory, and mandates outlined in the subrecipient agreements. HRD staff also ensure adherence to the Continuum of Care's written standards and City of Detroit Policies and Procedures outlined in this manual.

Subrecipient Staff Training

In order to ensure those experiencing homelessness are receiving high quality services, all organizations are required to have a staff training plan 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

HRD 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 includes 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.

Please refer to the program specific sections for details on each eligible program type.

Minimum Period of Use

Street Outreach

Street Outreach services must be provided for at least the period of time for which ESG funds are committed for that purpose.

Emergency Shelter

Where ESG funds are used solely for essential services or shelter operations under the Emergency Shelter component, services or shelter must be provided to homeless individuals and families at least for the period during which the ESG funds are provided ([§ 576.102\(c\)\(2\)](#)). In the case of a seasonal shelter, this could be based on the contract period specified in the subrecipient agreement.

Eligible Program Participants

ESG funds may be used to fund eligible activities that benefit either people who are homeless or those at-risk of homelessness. The table below summarizes which populations can be served under each program component. Please refer to the [ESG Program Interim Rule](#) for additional eligibility criteria, as well as those that may be established by the recipient.

Table 2 shows the eligible populations that can be served under each program component. Please refer to [24 CFR 576.2](#) for definitions of “Homeless” and “At Risk of Homelessness”

Program Component	Serving People Who Are Homeless	Serving People at Risk of Homelessness
Street Outreach	X	
Emergency Shelter	X	
Rapid Rehousing	X	
Homelessness Prevention		X

Table 2: Eligible Program Populations

All programs are required to collect and record homelessness status at program entry and exit in HMIS (or a comparable database for domestic violence providers) and in the client’s file.

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.

Section 6: Street Outreach



Overview

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.

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.

In accordance with 24 CFR 576.101(b), Minimum Period of Use, the subrecipient must provide services to homeless individuals and families for at least the period during which ESG funds are provided. This means that the street outreach project must be operational for the entire grant period.

Priorities

Street outreach teams must demonstrate the following priorities:

- Case management that is client-centered and trauma-informed;
- Demonstrate success in connecting clients to mainstream benefits, such as income/employment and health;
- Demonstrate success in exits to permanent housing, with the understanding that households do not first require a shelter stay in order to obtain permanent housing;
- A strong mental health and crisis management service delivery model;
- Participant-driven, and strengths-based service delivery that goes beyond basic needs;
- Flexibility to adjust schedule to meet the needs of those experiencing unsheltered homelessness;
- Ability to provide services on federal holidays; and
- Ability to work outside of standard business hours

Program Components

The City funds street outreach programs to provide a combination of general engagement and housing navigation services. The goal of general engagement is to provide basic needs and connection to emergency shelters to those experiencing unsheltered homelessness. The purpose of the housing navigation component is to connect unsheltered households to permanent housing resources. Both components must be provided by outreach teams.

Important: Homelessness Solutions Street Outreach funded projects operate both general engagement and Housing Navigation activities under one program. The combined component will be referred to as Street Outreach. At minimum, each outreach team will be required to have 1 full time employee (FTE) for housing navigation. All teams will be expected to respond to general engagement /basic needs outreach requests during their hours of operation.

General Engagement Expectations

Services are provided in the streets with a majority of the services provided outside of normal business hours. The goal of general engagement is primarily to develop relationships with unsheltered individuals and connect them with resources including shelter or CAM access points, substance abuse or mental health treatment, and/or mainstream benefits and services. 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 the City of Detroit as well as CAM. To meet this 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. In addition, street outreach teams are expected to respond to City of Detroit outreach requests. Requests must be responded to within 3-48 hours depending upon the urgency level. Outreach requests are made by community members, Detroit Police Department, City of Detroit departments, or other members of the community. Outreach teams are required to follow up with HRD on the outcome of each request.

Housing Navigation Expectations

Services are provided to individuals and families identified through the chronic By Name List (BNL) and City of Detroit processes. 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 and providing transportation.

While navigation staff aren't required to do physical street outreach, they are still required to meet clients in the field and provide transportation as needed for housing related activities. Additionally, the City of Detroit may call on staff during scheduled shifts for targeted outreach and navigation to respond to outreach requests as needed.

Eligibility and Target Population

The recipient or its subrecipient must conduct an initial evaluation to determine the eligibility of 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 centralized or coordinated assessment requirements set forth under [§ 576.400\(d\)](#) and the written standards established under [§ 576.400\(e\)](#).

All households served under the street outreach program component must be experiencing unsheltered homelessness within the Detroit CoC. Unsheltered homelessness is defined by the [Homeless Definition Final Rule](#):

Category 1 Literally Homeless: 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. Examples of places not meant for habitation include cars, parks, sidewalks, and abandoned buildings.

Street outreach field efforts are to be focused primarily around a CoC defined list of hot spots and identified households through the use of the City's [Outreach Request Form](#). The City of Detroit seeks to ensure outreach services are accessible throughout the Detroit CoC limits. Clients will be assigned by the City of Detroit and the coordinated entry lead agency to street outreach teams as applicable. Outreach teams should prioritize households that are experiencing unsheltered chronic homelessness. For more detail on the definition of chronic homelessness, please see HUD's [Defining "Chronically Homeless" Final Rule](#).

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:

- Verify if the person(s) is working with a service provider, such as an outreach team, or housing agency, via HMIS and assist with reconnection.
- A lead case manager/navigator is established through the By-Name List process.
- 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.
- Other agencies will reinforce this intervention so that agencies are not working against one another.

Eligible Activities

The City of Detroit prioritizes four eligible activities: Engagement, Case Management, Data Entry (HMIS), and Transportation for funding.

Subject to the expenditure limit in [§ 576.100\(b\)](#), ESG funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care by a licensed medical professional to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. For the purposes of this section, the term "unsheltered homeless people" means individuals and families who qualify as homeless under paragraph (1)(i) of the "homeless" definition under [§ 576.2](#). The eligible costs and requirements for essential services consist of:

Engagement

Engagement includes the costs of activities to locate, identify, and build relationships with persons experiencing unsheltered homelessness 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 homeless people and mainstream social services and housing programs, including emergency shelter,

transitional housing, community-based services, Permanent Supportive Housing, Rapid Rehousing programs and Project Based Vouchers. Eligible costs include the cost of agency issued cell phones for outreach workers during the performance of these activities.

Case Management

Case Management includes the cost of assessing housing and service needs, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participants. 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, coordinating medical care as needed, as well as achieving permanent housing stability.

Emergency Health Services

Eligible costs for Emergency Health Services are:

- 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

Eligible costs are:

- 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 or 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, under this section. The costs of transporting persons experiencing unsheltered homelessness 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 and transport, 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. This includes 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
5. Train or bus tickets, taxi or rideshare for program participant travel to and from medical care

Services for Special Populations

ESG funds may be used to provide services for homeless youth ages 18-24, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible. The term "victim services" mean 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.

HMIS

ESG funds may be used to pay the costs of contributing data to the HMIS designated by the CoC for the area, including the costs of:

- Purchasing or leasing computer hardware;
- Purchasing software or software licenses;
- Purchasing or leasing equipment, including telephones, fax machines, and furniture;
- Obtaining technical support;
- Leasing office space;
- Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS;
- Paying salaries for operating HMIS, including:
 - Completing data entry;
 - Monitoring and reviewing data quality;
 - Completing data analysis;
 - Reporting to the HMIS Lead;
 - Training staff on using the HMIS or comparable database; and

- Implementing and complying with HMIS requirements;
- Paying costs of staff 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;
- Paying staff travel costs to conduct intake; and
- Paying participation feeds charged by the HMIS Lead, if the recipient or subrecipient is not the HMIS Lead. The HMIS Lead is the entity designated by the CoC to operate the area's HMIS.

Performance Benchmarks

The City will require that all Outreach providers track their performance on the following measures:

- Percentage of households that exit to any sheltered destination
- Percentage of households that meet the definition of unsheltered homelessness
- Percentage of households that exit to a permanent housing destination

Performance benchmarks may change from year to year. Any changes will be communicated to subrecipients prior to the start of the grant year.

Severe Weather Policy

All outreach teams are expected to mobilize a code blue response during extreme cold conditions as defined as:

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

Please reference Appendix VI for full Severe Weather Policy.

Client Files and Record Keeping

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 and/or case note:

- Identification documentation (or case notes documenting efforts to obtain ID)
- Verification of Homelessness upon intake (must be a place not meant for habitation and be re-certified every 30 days.)
- Signed HMIS Release of Information (for all adult members of the household)

- Case notes should reflect the timelines of each engagement/service(s) provided from entry to exit of the outreach program, must be documented a minimum of interactions every 30 days.
- VI-SPDAT
- Intake form (HMIS intake)
- Income verification, including back up documentation or verification of zero income (for all adult members of the household).
- Individualized Housing and Service Plan
- Verification of disability (if applicable)
- Verification of chronicity (if applicable)
- Documentation of emergency health services (if applicable)
- Documentation of emergency mental health services (if applicable)
- Documentation of transportation (if applicable)
- Documentation of ineligibility (if applicable)

As part of the programmatic monitoring process, HRD staff will review a selection of client files for the program year.

Documenting Homelessness

Category 1: Literally Homeless Clients

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, however the order of priority is as follows:

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

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; or
- Written referral by another housing or service provider; or
- Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter.
- For individuals exiting and institution- one of the forms of evidence above and
 - Discharge paperwork or a written or oral referral or
 - Written record of intake worker's due diligence in to obtain above evidence and certification by individual that they exited institution

Category 4: Fleeting/Attempting to Flee Domestic Violence Clients

For Victim Service Providers:

- 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:

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

For addition information on HUD's categories of homelessness and documentation of homelessness please reference HUD's [Homeless Definition and Recordkeeping Requirements](#) quick sheet.

Section 7: Emergency Shelter



Overview

In accordance with [24 CFR 576.2](#), and emergency shelter must be a 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 per [24 CFR 576.102](#). **Program must have prior approve from the City of Detroit in order to use ESG funding for hotel/ motel stays.**

Emergency Shelters and Warming Centers must be low-barrier and accept referrals without any screening criteria. This means that households cannot be screened out of shelter for substance use, mental health, disability, family composition, or gender identity. Additionally, all overnight facilities must take walk-ins after CAM operating hours. Any walk-in households must be referred to CAM the next business day.

Please note that for the purposes of Section 7, the term emergency shelter applies to both year-round emergency shelters and season warming centers unless otherwise noted.

Priorities

All emergency shelters and warming centers must:

- Provide clean and safe overnight shelter
- Have strong housing-focused case management that is client-centered and trauma-informed
- Demonstrate success in exits to permanent housing
- Demonstrate success in connecting clients to mainstream benefits, such as income/employment and health, as shown through HMIS data.
- Offer onsite programs and amenities that go beyond basic needs. Examples include, but are not limited to, quiet spaces, learning labs, onsite health services, onsite employment services, etc.
- Be flexible, participant-driven, and strengths-based service delivery; and
- Allow participants to stay in the shelter during daytime hours

Program Components

The City funds two types of emergency shelters. Both shelter models cannot require occupants to sign leases or occupancy agreements.

Emergency Shelters

An emergency shelter operates year-round to provide overnight shelter to families and individuals experiencing homelessness. Emergency shelters may be population specific, such as those serving youth, Veterans, or domestic violence survivors. All population specific shelters must be approved by the City prior to the start of the grant year.

Warming Centers

Warming Centers operate on a seasonal basis to provide overnight shelter to families and individuals experiencing homelessness during the winter months (typically November through March). This component, along with emergency shelters, operates as a first line of defense during freezing temperatures for those experiencing homelessness.

Eligibility and Target Population

Eligibility

All households served in emergency shelters must meet HUD's definition of homeless as defined in [24 CFR 576.2](#).

Homeless means:

1. An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - i. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
 - ii. An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
 - iii. An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;
2. An individual or family who will imminently lose their primary nighttime residence, provided that:
 - i. The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
 - ii. No subsequent residence has been identified; and
 - iii. The individual or family lacks the resources or support networks, *e.g.*, family, friends, faith-based or other social networks, needed to obtain other permanent housing;
3. Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:
 - i. Are defined as homeless under section 387 of the Runaway and Homeless Youth Act ([42 U.S.C. 5732a](#)), section 637 of the Head Start Act ([42 U.S.C. 9832](#)), section 41403 of the Violence Against Women Act of 1994 ([42 U.S.C. 14043e-2](#)), section 330(h) of the Public Health Service Act ([42 U.S.C. 254b\(h\)](#)), section 3 of the Food and Nutrition Act of 2008 ([7 U.S.C. 2012](#)), section 17(b) of the Child Nutrition Act of 1966 ([42 U.S.C. 1786\(b\)](#)) or section 725 of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11434a](#));

- ii. Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
 - iii. Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
 - iv. Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or
4. Any individual or family who:
- i. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
 - ii. Has no other residence; and
 - iii. Lacks the resources or support networks, *e.g.*, family, friends, faith-based or other social networks, to obtain other permanent housing.

Target Population

Emergency shelters and Warming Centers can be population specific upon approval from the City. The population specific types are:

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 [24 CFR 578.93, Fair Housing and Equal Opportunity](#), for more information about this policy.

If a 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.

Family Shelter

Family shelters accept 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 to Housing Final Rule](#).

While it is acceptable for a shelter or housing program to limit assistance to households with children, **it may not limit assistance to only women with children**. Such a shelter must also serve the following family types, should they present, in order to be in compliance with the Equal Access rule:

- Single male head of household with minor child(ren); and
- Any household made up of two or more adults, regardless of sexual orientation, marital status, or gender identity, presenting with minor child(ren).

In this example, the emergency shelter is not be required to serve families composed of only adult members and could deny access to these types of families provided that all adult-only families are treated equally, regardless of sexual orientation, marital status, or gender identity.

In accordance with [24 CFR 576.102](#), all shelters are prohibited 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.

Special Population Shelter

ESG funds may be used to provide services for homeless youth, Veterans, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under [24 CFR 576.102](#). The term victim services mean 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.

Eligible Activities

The HUD ESG Program allows a number of eligible activities as part of the essential services for individuals and families experiencing homelessness and residing in emergency shelters. However, the City of Detroit focuses the bulk of the awards on three eligible activities: Housing-Focused Case Management, Shelter Operations, and Data Entry (HMIS) over other activities. For a complete list of emergency shelter eligible activities refer to [24 CFR 576.102](#).

Emergency shelter activities must be in compliance with the following categories:

1. **Essential Services** to people in emergency shelters (§ 576.102 (a)(1))
2. **Renovation**, rehabilitation, or conversion of buildings to be used as emergency shelters (§ 576.102 (a)(2))

3. **Operation** of emergency shelters (§ 576.102 (a)(3))
4. Assistance required under the **Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970** (URA) (§ 576.102 (a)(4))

In addition to the activities listed under [24 CFR 576.102](#), HMIS activities under [24 CFR 576.107](#) are also eligible.

Essential Services

Housing-Focused Case Management

The goal of emergency shelter is to provide a safe environment for those in a housing crisis AND to ensure that services and support are provided that assist the person to moving into permanent housing. While HUD defines “essential services” widely, the City of Detroit requires all emergency shelters to provide the coordination of or direct housing-focused case management services to all persons experiencing homelessness being served by their agency. Eligible costs include the cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participants. Shelter providers must ensure their case management ratio allows for the implementation of housing-focused case management. Housing-focused case management activities consist of:

- 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 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 intimate partner violence, dating violence, sexual assault, and stalking.
- Developing an individualized housing and service plan, including planning a path to permanent housing stability.
- Assisting program participants in obtaining permanent housing and required documentation; and
- Case management services, such as housing plans and case notes, and documentation of case management activities in the client’s chart and HMIS when applicable.

Additional Essential Services

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 childcare 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 is 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, childcare, 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 mean services that assist program participants who are victims of intimate partner 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 intimate partner violence, dating violence, sexual assault, or stalking.

Organizations must state if they plan to serve a special population during the NOFA application process.

Renovation

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.

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).

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).

Minimum Period of Use

Renovated Buildings

Each building renovated with ESG funds must be maintained as a shelter for [homeless](#) individuals and families for not less than a period of 3 or 10 years, depending on the type of renovation and the value of the building. The “value of the building” is the reasonable monetary value assigned to the building, such as the value assigned by an independent real estate appraiser. The minimum use period must begin on the date the building is first occupied by a [homeless](#) individual or family after the completed renovation. A minimum period of use of 10 years, required for major rehabilitation and conversion, must be enforced by a recorded deed or use restriction.

1. **Major rehabilitation.** If the rehabilitation cost of an [emergency shelter](#) exceeds 75 percent of the value of the building before rehabilitation, the minimum period of use is 10 years.
2. **Conversion.** If the cost to convert a building into an [emergency shelter](#) exceeds 75 percent of the value of the building after conversion, the minimum period of use is 10 years.
3. **Renovation other than major rehabilitation or conversion.** In all other cases where ESG funds are used for renovation, the minimum period of use is 3 years.

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 recipient or subrecipient does not need to limit these services or shelter to a particular site or structure, so long as the site or structure serves the same type of persons originally served with the assistance (*e.g.*, families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or serves homeless persons in the same area where the recipient or subrecipient originally provided the services or shelter.

Maintenance of Effort

The maintenance of effort requirements under [§ 576.101\(c\)](#), which apply to the use of ESG funds for essential services related to street outreach, also apply for the use of such funds for essential services related to emergency shelter.

Shelter Operations

Eligible costs for shelter operations 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. Where no appropriate emergency shelter is available for a homeless family or individual, eligible costs may also include a hotel or motel voucher for that family or individual.

Assistance required under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA).

Eligible costs are the costs of providing URA assistance under [§ 576.408](#), including relocation payments and other assistance to persons displaced by a project assisted with ESG funds. Persons that receive URA

assistance are not considered “program participants” for the purposes of this part, and relocation payments and other URA assistance are not considered “rental assistance” or “housing relocation and stabilization services” for the purposes of this part.

HMIS

ESG funds may be used to pay the costs of contributing data to the HMIS designated by the CoC for the area, including the costs of:

- Purchasing or leasing computer hardware.
- Purchasing software or software licenses.
- Purchasing or leasing equipment, including telephones, fax machines, and furniture.
- Obtaining technical support.
- Leasing office space.
- Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS;
- Paying salaries for operating HMIS, including:
 - Completing data entry.
 - Monitoring and reviewing data quality.
 - Completing data analysis.
 - Reporting to the HMIS Lead.
 - Training staff on using the HMIS or comparable database; and
 - Implementing and complying with HMIS requirements.
- Paying costs of staff 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.
- Paying staff travel costs to conduct intake; and
- Paying participation feeds charged by the HMIS Lead, if the recipient or subrecipient is not the HMIS Lead. The HMIS Lead is the entity designated by the CoC to operate the area’s HMIS.

Performance Benchmarks

The City of Detroit requires that all emergency shelter and warming center providers track their performance on the following measures:

- Shelter utilization must be at 90% according to the APR/ CAPER.
- Percentage of exits to a permanent housing destination.

Shelter Habitability and Lead Requirements

Habitability

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 subrecipient agreement, 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.

See Appendix VII for additional information.

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.

Please refer to Appendix V for additional information.

Required Policies and Procedures

All City of Detroit funded shelters must have written policies on the items listed in this section. In addition, shelter operating policies need to be communicated to clients.

The diagram from the National Alliance to End Homelessness (NAEH) below shows the keys to operating a successful emergency shelter. All shelters are required to adapt these five focuses into their daily operations.

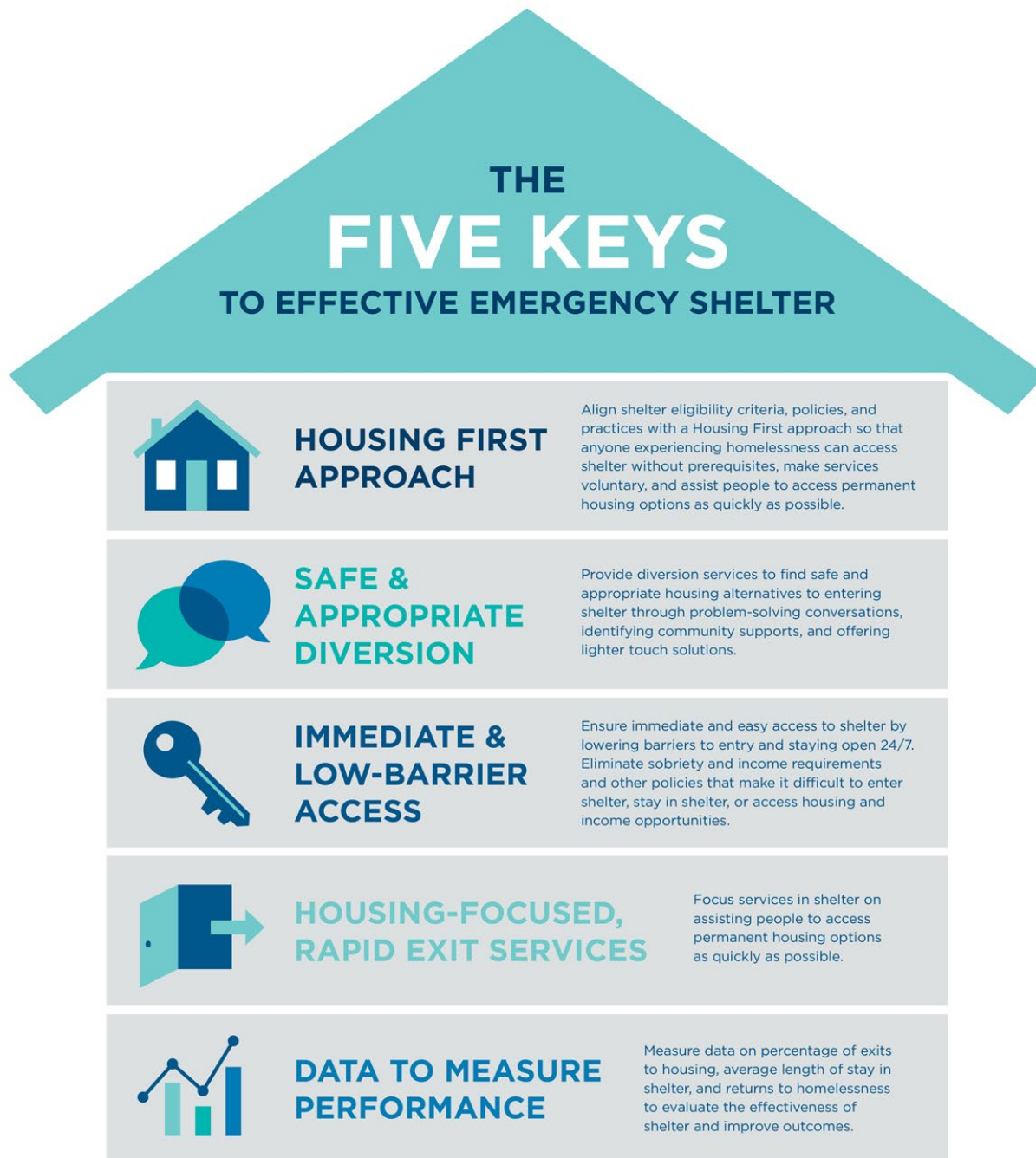


Figure 1: NAEH, *The Five Keys to Effective Emergency Shelter*

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 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. Potential guests have the ability to access services at any time of the day or night, with or without a referral from CAM.

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.](#)"

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 low-barrier 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

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.

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.

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

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.

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 number 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.

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.

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

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.

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.
- Utilizing harm reduction, 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 they have admitted to, being violent or physically intrusive inside the shelter, or they have 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, an appropriate referral out of the shelter should be made.
5. Staff should be honest with the client about why they are 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 they are on a 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.

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:

- Detailed case notes to document services provided to clients should be entered into HMIS first and foremost but can also be entered into a client paper chart.

- A housing plan 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.
- 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.
- Domestic Violence shelters only: Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking

Serving 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 educational 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.

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 can be posted above sinks and in other locations in shelters for all staff and residents to follow. 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.

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

Exit and Termination Policies

Persons experiencing homelessness should only be banned from a shelter 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.

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.

Bans

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 6 months unless under extreme circumstances)
 - 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 six-month 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. Bans will not be honored unless entered in HMIS. Bans should not exceed more than 6 months unless in extreme cases and must be program specific, meaning they cannot be applied to other ESG funded programs without due cause.

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:

- 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.

- 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.
- Individuals/households have the right to ask assistance of another person to speak on their behalf or help fill out a consumer grievance form.
- 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.
- Copies of all documents are placed in the client file.

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.

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 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.

Confidentiality and Privacy

Subrecipients must incorporate into their policies and procedures a process that will ensure the confidentiality of program participants' identifying information; records pertaining to any individual or family provided family violence prevention; and treatment services offered under any project assisted with ESG funds. Furthermore, the address or location of any shelter for victims of domestic violence assisted under ESG will be anonymous except upon written authorization from the person or persons responsible for the operation of the shelter for this information to be made public.

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 VI)
- 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 the shelter. Flexibility with clients given certain circumstances requires 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 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.

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.

Violence Against Women Act

Per the VAWA, [24 CFR 5.2005](#), an applicant for assistance or tenant assisted under a covered housing program may not be denied admission to, denied assistance under, terminated from participation in, or evicted from the housing on the basis or as a direct result of the fact that the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, if the applicant or tenant otherwise qualifies for admission, assistance, participation, or occupancy.

All emergency shelters must accept clients that are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

Community Standards

The City of Detroit's Homelessness Solutions (HS) team, with the support of the Michigan Department of Health and Human Services (MDHHS) Emergency Shelter Program (ESP), partners is committed to improving our homeless system by ensuring it is designed to benefit and help individuals and families in need. To accomplish this, the HS team has worked alongside the shelter providers within our community in 2023 and 2024 to develop community standards.

These standards were developed in an effort to reduce barriers and overly restrictive rules, while still maintaining structure, and allow clients to receive the most supportive and consistent services possible. These community standards will also help to create a more consistent and standardized approach from all shelters in our CoC.

Providers are required to train all staff of the Community Standards expectations. Training provided by the City of Detroit can be found [here](#). These standards are subject to change throughout time as necessary to continue to improve services. See Appendix IX for the list of Community Standards

Client Files and Record Keeping

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 (In HMIS)
- Signed HMIS Release of Information (ROI) (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 IX)
- 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: Childcare provided for program participants
 - Meals and snacks provided
 - Appropriate developmental activities provided
 - Verification that the childcare 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, childcare, or other eligible essential services facilities
 - Program participant's travel on public transportation

Eligibility Documentation

- 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

Category 1: Literally Homeless Clients

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

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.

Category 4: Fleeing/Attempting to Flee Domestic Violence Clients

For Victim Service Providers:

- 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:

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

Section 8: Rapid Rehousing



Overview

Rapid Rehousing 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 Rehousing 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 Rehousing program have applied for a Housing Choice Voucher through the Michigan State Housing Development Authority. While voucher availability is never a guarantee, ensuring the tenant obtains their vouchers when available is of tantamount importance both for that tenant's long-term self-sufficiency and for those in shelter who would benefit from Rapid Rehousing. This is a key part of the case management.

Priorities

Rapid Rehousing projects must demonstrate the following priorities:

- A staffing structure designed specifically to support households experiencing homelessness (maximum case management ratio of 1:25);
- High-quality, tenant-centered housing search resources and experience;
- Demonstrated progressive engagement model;
- Strong housing-focused case management that is client-centered and trauma-informed;
- Demonstrated success in connecting clients to mainstream benefits, such as income / employment and health;
- Demonstrated success in exits to permanent housing;
- A direct connection to workforce development; and
- Flexible, participant-driven, and strengths-based service delivery.

Program Components

Rapid Rehousing program design must support the Detroit CoC's commitment to end homelessness through the provision of low-barrier and Housing First approaches that quickly connect individuals and families experiencing homelessness to safe, affordable, and sustainable housing opportunities complemented by ongoing services that are designed to stabilize households and to prevent future returns to homelessness. Additionally, project design must address the unique needs of high-risk populations including older adults, racial and ethnic minorities, people with medical conditions, and people with disabilities. Please see [this resource](#) describing the core components of RRH.

The City funds two different RRH program types.

- **Standard RRH:** provision of housing search and responsive, person-centered financial assistance including housing startup costs, arrears payments, security deposits, rental assistance, and housing stabilization services designed to provide each household referred with what it needs to exit homelessness and become stable in permanent housing.
- **Sheltered Housing Placement:** provide primarily housing search case management so that households quickly move out of emergency shelter. Financial assistance should be offered using a progressive engagement model and therefore only provided as needed to stabilize households in permanent housing.

Eligibility and Target Population

All RRH programs must serve individuals and families experiencing homelessness, as defined by categories 1 and 4 of the [Homeless Definition Final Rule](#). Rapid Rehousing programs must serve only clients referred by the coordinated entry lead agency. It is important to note that not all households who qualify for Rapid Rehousing assistance will receive it and that prioritization criteria have been established by the community to prioritize limited resources. Agencies must take care to ensure proper documentation is obtained and stored with agency and client files. **All eligible clients must be served without any additional participation requirements, targeting, or entry criteria.**

Eligible Activities

Rental Assistance

Rental Assistance funds will be used to provide rental assistance to support persons moving from a homeless situation into permanent, stable housing as indicated below. The subrecipient may provide program participants with up to 24 months of rental assistance during any 3-year period, including any combination of.

- Short-term rental assistance – up to 3 months of rent
- Medium-term rental assistance – 4 to 24 months of rent
- Payment of rental arrears, which 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

Funds will be used to support case management staff who will work with persons and/or households who are homeless to ensure long-term housing stability during the program and after the rental assistance term ends. Notwithstanding Housing First expectations, RRH projects are required to meet with project

participants at least once monthly to help ensure long-term housing stability for the participant. Such services include providing participants with the necessary assessment and services to assist them with locating, moving into, and maintaining permanent housing, as well as developing a plan to assist the program participant to retain permanent housing after the ESG assistance ends. These funds may also be used to provide direct financial assistance to assist households who are experiencing homelessness with moving into housing as described below:

Financial Assistance	Stabilization Services	Other Eligible Costs
<ul style="list-style-type: none"> • Rental application fees • Security deposit • Last month’s rent • Moving costs • Utility deposits • Utility payments 	<ul style="list-style-type: none"> • Housing search and placement • Housing stability case management • Mediation • Legal services • Credit repair 	<ul style="list-style-type: none"> • Staff and facility costs

Financial Assistance

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

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

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).

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.

Utility Deposits

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

1. Gas
2. Electric
3. Water
4. 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.

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:

1. Assessment of housing barriers, needs, and preferences
2. Development of an action plan for locating housing
3. Housing search
4. Outreach to and negotiation with owners
5. Assistance with submitting rental applications and understanding leases
6. Assessment of housing for compliance with ESG requirements for habitability, lead- based paint, and rent reasonableness/FMR as described above
7. Assistance with obtaining utilities and making moving arrangements
8. 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.

This 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.

1. **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.
2. **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.

Referrals

100% of all referrals to the City of Detroit’s Rapid Rehousing programs will be provided through Detroit’s Coordinated Assessment Model (CAM), per the City of Detroit’s [Rapid Rehousing Policies and Procedures](#).

Prioritization and Referral Process

Clients who are recommended for Rapid Rehousing are prioritized by Acuity Group (Acuity Group 2, then Acuity Group 3, etc.) and 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:

1. Family status
 - a. Families
 - b. Singles Adults
2. Length of time homeless
 - a. 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 (HAND) and will be included in the Manual’s annual updates.

Referral to Rapid Rehousing Providers

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

Once a referral is made, the Rapid Rehousing providers will follow the timeline in Figure 2.

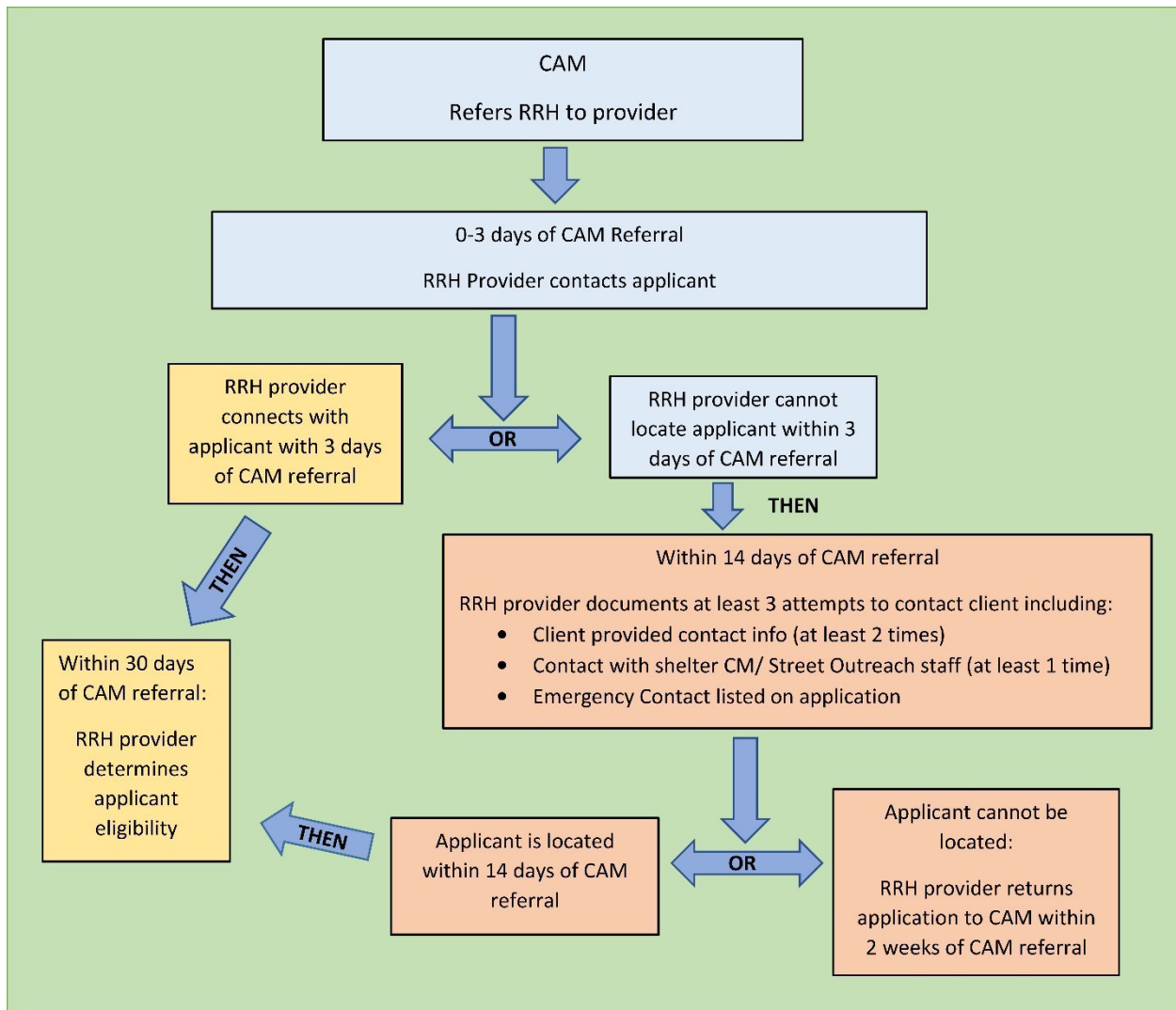


Figure 2: RRH Referral Timeline

Security Deposit Only Referrals

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 Rehousing 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.**

Given the limited diversion funding available in the community, and Rapid Rehousing provider expertise in assisting households in the lease-up process, Rapid Rehousing providers are required to assist in both “standard” Rapid Rehousing referrals (including ongoing financial assistance and case management, as needed) AND Security Deposit Only referrals (regardless of subsidy status).

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 for Rapid Rehousing is verification of homelessness, which should be uploaded into the client's HMIS record.** An open entry in a shelter program is sufficient documentation to verify the client's homelessness. If a household is being referred to a Rapid Rehousing 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, the RRH 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 Rehousing 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 receives 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 Rehousing program eligibility:

1. 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.
2. Birth Certificates for all children in household- Medicaid card can substitute
3. 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.

If eligible for Veteran Services, the CAM will refer the client to SSVF. If not eligible for Veteran Services, CAM will follow established prioritization for RRH.

Referral Refusals

The following guidance outlines the reasons that a referral can be refused by a Rapid Re- Housing service organization:

- If there is a conflict of interest between staff and a referral, every effort should be made to reassign the referral to a non- conflict staff person.
- An individual Rapid Rehousing program may refuse a program referral if the applicant was previously served by the Rapid Rehousing program and 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.

Documenting Referrals in HMIS

Referral Outcome

After a RRH provider receives a referral from CAM in HMIS, the provider is required to document the outcome of the referral using one of the following options:

- **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 parameters outlined in Figure 2 of this document)

Post Referral Workflow

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

- Run HMIS referral report for the current referral period
- Compare HMIS referral report to referral confirmation e-mail received from CAM
- If any discrepancies exist, contact CAM immediately to inform
- 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
- At least 2 documented contacts to the contact info provided by client
- At least 1 documented contact to the shelter case manager/street outreach provider
- If applicable, at least 1 documented contact to any other contact listed for client in HMIS
- Once contact with client is made, schedule intake with client and complete the referral outcome as “accepted” in HMIS.
- 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.
- 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.
- If client is found to be ineligible or refuses services at the point of intake:
 - Complete the referral outcome as “declined” in HMIS
 - Complete an entry in the “RRH Outcomes/Client Status” sub-assessment on the summary page with the following information:
 - RRH Client Status: Client denied for RRH
 - If Denied-Reason: Select the reason for denial
- 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.

- While working with client toward housing (after client enrolled in program):
- Document all case notes in the “Goals” section of HMIS under the “Case Plans” tab.
- Complete an entry in the “RRH Outcomes/Client Status” sub-assessment on the summary page once per month or as client status changes.

Supportive Services

The primary goal of Rapid Rehousing 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 Rehousing programs should rely heavily on a case management plan to ensure long term stability for program participants. Rapid Rehousing Supportive Services should meet the following requirements:

- Providers should utilize progressive engagement to provide the fullest extent of services necessary to help participants reach identified goals. **Engagement in services is voluntary.** All attempted contacts should be documented in HMIS.
- Rapid Rehousing 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 Rehousing.
- Rapid Rehousing programs require a visit – virtually or in-person - with Rapid Rehousing participants every 30 days and a home visit every 90 days. The initial housing plan should be drafted with participants at project entry. Housing plans should be updated within 30 days of moving into housing. 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.

The role of Rapid Rehousing 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
- Work with participant to connect to mainstream resources and employment support
- 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

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% of 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.

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:

- The program participant moves out of the housing unit for which the program participant has a lease
- The lease terminates and is not renewed OR
- 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](#).

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 and Lead-Based Paint Requirements

All RRH units must meet minimum habitability standards for inspection and lead-based paint. Locally, Rapid Re-Housing providers must also pass HSQ inspection**. See **Appendix IV** for information regarding inspection requirements and **Appendix V** or information regarding lead-based paint requirements.

****NOTE:** Providers will be required to move to NSPIRE requirements – which will replace HQS in October 2025.

Termination of Assistance

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:

1. At least one face to face meeting with the Rapid Re-Housing participating household discussing program violations;
2. A written plan for rectifying program violations including action steps for both Rapid Re-Housing agency staff and program participants;
3. If termination is due to an inability to contact the client, the following must be documented in the file:
 - a. An attempted home visit; AND
 - b. 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 (24 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.

Performance Benchmarks

The City will require that Rapid Re-Housing providers track their performance on the following measures:

- Average length of time (days) to move households into housing from program entry;
- Percentage of households who exit to a permanent housing destination;
- Percentage of households that exit within 180 days of program entry*

*The City will continue to monitor both program and system level performance on this benchmark. The City will inform programs prior to the contract start date if they will be measured on this benchmark.

Client Files and Recordkeeping

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, RRH providers receiving CoC or City of Detroit ESG funds are expected to use the program forms provided on [HAND's website](#). 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
- 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 placed in the file when obtained. **Reminder, lack of identification should never be a barrier to program entry.**

Required Releases of Information and Agreements

All client files must include the following:

- 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
- Lead notification (if applicable)

Documenting Income

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

For FY2024, 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:

1. All adults (persons 18 and over) must have documentation of income (even if there is no income).
2. One or more of the below documents must be kept in the client/household file.
3. If there is more than one adult in a household, documentation must be provided for each adult household member.

4. 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).

Please see Appendix III for income documentation options and exclusions.

Documenting Homelessness

Category 1: Literally Homeless Clients

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. Any of the following forms of documentation may be used, however the priority of types of documentation are as follows:

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

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:

1. Written observation by the outreach worker
2. Written referral by another housing or service provider
3. Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter **AND**
 - i. 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**
 - ii. 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.

Category 4: Fleeing/Attempting to Flee DV

For Victim Service Providers:

- 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:

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

Section 9: Homelessness Prevention



Overview

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 less than 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., Medicaid 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.

Priorities

Homelessness prevention programs must demonstrate the following priorities:

- High-quality, tenant-centered housing search resources and experience;
- Strong housing-focused case management that is client-centered and trauma-informed;
- Demonstrated success in connecting clients to mainstream benefits such as income/employment, education, training and health care;
- Demonstrate a progressive engagement model;
- Demonstrate success in exits to financially sustainable permanent housing;
- Landlord networks and demonstrated commitment to landlord engagement and recruitment;
- Direct connection to workforce development;
- Agencies that can work with clients that are doubled-up and can assist with relocation;
- Agencies must demonstrate the ability to perform all the core components of prevention: rental assistance and housing relocation and stabilization; and
- Flexible, participant-driven, and strengths-based service delivery.

Eligibility and Target Population

The Homelessness Prevention component provides eligible financial assistance and support services to prevent homelessness for qualified program participants as defined by Categories 2, 3 and 4 of the [Homeless Definition Final Rule](#), also found in Appendix I and have an annual income at or below 30% of area median income for the area as determined and defined by HUD. If a potential participant is in Category 4, they must not be sleeping in a place outlined in Category 1. Agencies must take care to ensure proper documentation is obtained and stored with agency and client files.

Homeless Prevention participants must have an annual income that is below 30% of the annual median family income for the area if being served with ESG.

Based upon assessed local need and identified local priority, the City will require that Homelessness Prevention providers:

- Serve all eligible clients without additional entry criteria or participation requirements;
- Be able to serve doubled-up households (non-leaseholders);
- Coordinate with mainstream services, including but not limited to Michigan Department of Health and Human Services (MDHHS) and the 36th District Court; and
- Conduct habitability inspections and lead compliance as required.

Referrals

Prevention providers serving both lease-holding and non-lease holding clients that are at immediate risk of homelessness can receive referrals through CAM unless otherwise requested by the City of Detroit. Eligible households contact CAM, receive a brief screening and prioritization assessment, and are then referred for services, dependent upon availability of resources. Please see Appendix XII to view the prevention prioritization assessment conducted by CAM. Providers are required to enter in a referral outcome in HMIS if receiving the referral from CAM.

Referral Outcome

After a prevention provider receives a referral from CAM in HMIS the provider is required to document the outcome of the referral using one of the following options:

- **Accepted:** Client referral accepted (Intake appointment scheduled)
- **Declined:** Client referral declined due to ineligibility, client refusal reason for decline must be provided.
- **Cancelled:** Acceptable reasons include:
 - Client was unable to be contacted for intake within 7 days using a variation of engagement tactics
 - No show for intake appointment (per contact parameter outlined in this document)

Eligible Activities

Rental Assistance

Rental Assistance funds will be used to provide short-term and medium-term rental assistance to support persons moving from a homeless situation into permanent, stable housing as indicated below:

- Short-term rental assistance – up to 3 months
 - Security Deposits

- Payment of rental arrears (one-time payment, up to 6 months) including any late fees on those arrears
- Medium-term rental assistance – 4 to 24 months
 - Security Deposits
 - Payment of rental arrears (one-time payment, up to 6 months) including any late fees on those arrears
 - Payment of rental arrears consists of a one-time payment for up to 6 months of arrears, including any late fees.

Except for a one-time payment of rental arrears and/or security deposits, 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).

A program participant may not receive more than 24 months of rental assistance during any 3-year period. Limits on the assistance under this section apply to the total assistance an individual receives, either as an individual or as part of a family.

Housing Relocation and Stabilization Services

Funds will be used to support case management staff who will work with persons and/or households who are at imminent risk of homeless to ensure long-term housing stability during the program and after assistance ends. Notwithstanding Housing First expectations, prevention providers are required to make contact at least monthly to help ensure long-term housing stability for the participant. Such services include providing participants with the necessary assessment and services to assist them with locating, moving into, and maintaining permanent housing, as well as developing a plan to assist the program participant to retain permanent housing after the ESG assistance ends. These funds may also be used to provide direct financial assistance to assist households who are experiencing homelessness with moving into housing as described below:

Financial Assistance	Stabilization Services	Other Eligible Costs
<ul style="list-style-type: none"> ● Rental application fees ● Security deposit ● Last month’s rent ● Moving costs ● Utility deposits ● Utility payments 	<ul style="list-style-type: none"> ● Housing search and placement ● Housing stability case management ● Mediation ● Legal services ● Credit repair 	<ul style="list-style-type: none"> ● Staff and facility cost

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.

Please note that in order to receive financial assistance, the program participant cannot be receiving the same type of assistance through any other public sources. In addition, participants are not eligible for financial assistance that are currently receiving housing payments under the Uniform Relocation Act (URA).

Rental Application Fees

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

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 documented in the leasing agreement and included in calculating the program participant's total rental assistance (which cannot exceed 24 months during any 3-year period per ESG regulations).

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 the form of arrears is not eligible.

Utility Deposits

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

1. Gas
2. Electric
3. Water
4. 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.

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:

1. Assessment of housing barriers, needs, and preferences
2. Development of an action plan for locating housing
3. Housing search
4. Outreach to and negotiation with owners
5. Assistance with submitting rental applications and understanding leases
6. Assessment of housing for compliance with ESG requirements for habitability, lead- based paint, and rent reasonableness/FMR as described above
7. Assistance with obtaining utilities and making moving arrangements
8. 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.

Case managers are required to meet with prevention participants at least once per month.

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.

1. **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.
2. **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.

HMIS

ESG funds may be used to pay the costs of contributing data to the HMIS designated by the CoC for the area, including the costs of:

- Purchasing or leasing computer hardware;
- Purchasing software or software licenses;
- Purchasing or leasing equipment, including telephones, fax machines, and furniture;

- Obtaining technical support;
- Leasing office space;
- Paying charges for electricity, gas, water, phone service, and high speed data transmission necessary to operate or contribute data to the HMIS;
- Paying salaries for operating HMIS, including:
 - Completing data entry;
 - Monitoring and reviewing data quality;
 - Completing data analysis;
 - Reporting to the HMIS Lead;
 - Training staff on using the HMIS or comparable database; and
 - Implementing and complying with HMIS requirements;
- Paying costs of staff 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;
- Paying staff travel costs to conduct intake; and
- Paying participation feeds charged by the HMIS Lead, if the recipient or subrecipient is not the HMIS Lead. The HMIS Lead is the entity designated by the CoC to operate the area's HMIS.

Evaluation of Program Participant Eligibility and Needs

Initial Evaluation

In accordance with [24 CFR 576.401](#), the subrecipient must conduct an initial evaluation to determine the eligibility of 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. An initial evaluation must include documentation homeless status, verification that the household income does not exceed 30% AMI as stabilized by HUD, and determine that the household lacked sufficient resources and support networks necessary to retain housing without ESG assistance.

For each individual and family determined ineligible to receive ESG assistance, the record must include documentation of the reason for that determination.

Re-evaluation

The subrecipient must re-evaluate the program participant's eligibility and the types and amounts of assistance the program participant needs not less than once every 3 months for program participants receiving homelessness prevention assistance. At a minimum, each re-evaluation of eligibility must establish that:

- i. The program participant does not have an annual income that exceeds 30 percent of median family income for the area, as determined by HUD; and
- ii. The program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance.

The subrecipient may require each program participant receiving homelessness prevention to notify the subrecipient regarding changes in the program participant's income or other circumstances (*e.g.*, changes in household composition) that affect the program participant's need for assistance under ESG. When notified of a relevant change, the recipient or subrecipient must re-evaluate the program participant's eligibility and the amount and types of assistance the program participant needs.

Rental Assistance

Subrecipients should use progressive engagement to provide the fullest extent of services necessary to help participants reach identified goals and retain permanent housing after the ESG assistance ends. While prevention participants can be provided up to 24 months of rental assistance during any 3-year period, subrecipients should provide ***the minimum assistance necessary for the shortest time possible***. Case Managers should work closely with participants to determine their ongoing needs throughout their time in the program, and not less than one every 3 months. Subrecipients should have an internal tracking mechanism for monitoring length of time for participants in the program.

Housing Stability Case Management

ESG funds may be used to pay the cost of assessing, arranging, coordinating and monitoring the delivery of individualized housing stabilization services to a program participant already in permanent housing (not to exceed 24 months) or to assist a program participant to overcome immediate barriers to obtaining housing (not to exceed 30 days). Subrecipients should utilize progressive engagement to provide the fullest extent of services necessary to help participants reach identified goals. Subrecipients should have an internal tracking mechanism for monitoring length of time for participants in the program.

Termination of Assistance

If the subrecipient terminates any participants from the program, it must be done so in accordance with a formal process established by the subrecipient that recognizes the rights of individuals affected, that met the following requirements:

- Written notice to the program participant containing a clear statement of the reasons for termination,
- A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate) who made or approved the termination decision, and
- Prompt written notice of the final decision to the program participant

The subrecipient must 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. This must be outlined in the subrecipient's policies and procedures.

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
 - Must include plan for participant to retain permanent housing after assistance ends, taking into account all relevant considerations, such as 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
- Income Verification including backup documentation (paystubs, third-party verifications, self-declaration of zero income 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
 - Housing stability case management services must be document at least once per month
- 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

Documenting Homelessness

Subrecipients are required to verify and document homelessness at time of program entry.

Category 2: Imminent Risk of Homelessness Clients

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**
 - Certification that no subsequent residence has been identified **and**
 - 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

Category 4: Fleeing/Attempting to Flee Domestic Violence Clients

For Victim Service Providers:

- 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:

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

Note: If a potential participant is in Category 4, they must not be sleeping in a place outlined in Category 1 (literally homeless, living in an emergency shelter or place not meant for human habitation).

Documenting Income

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:

- 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.
- 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.
- 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](#)?
- 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:
 - Source documents (e.g., notice of termination from employment, bank statement, or health care bill showing arrears)
 - 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

- 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
- 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:
 - Source documents that evidence one or more of the conditions.
 - 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
 - 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.

- 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:
 - Runaway and Homeless Youth Act
 - Head Start Act
 - Subtitle N of the Violence Against Women Act of 1994
 - Section 330 of the Public Health Service Act
 - The Food and Nutrition Act of 2008
 - Section 17 of the Child Nutrition Act of 1966
- 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.

Income Documentation at Intake

Prevention programs are required to verify income of program participants at the time of intake.

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:

1. All adults (persons 18 and over) must have documentation of income (even if there is no income).
2. One or more of the below documents must be kept in the client/household file.
3. If there is more than one adult in a household, documentation must be provided for each adult household member.
4. 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).

Please see Appendix III for income documentation options and exclusions.

Calculating Rental and Program Assistance Payments

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

- Termination of Prevention programmatic rental assistance.
- Tenants will pay their portion of the rental amount directly to the property owner.

Subsidy Layering

Combining ESG Financial or Rental Assistance with Other Subsidies (§ 576.105(d) and § 576.106(c)):

- No financial or rental assistance can be provided to a household receiving the same type of assistance from another public source for the same time period (except 6 months of the tenant's portion of arrears).
- Rental assistance may not be provided to program participants who are currently receiving replacement housing payments under the URA.
- Rental assistance may be provided to an eligible program participant who is living in a housing unit developed with Low Income Housing Tax Credits or other development subsidies. Development subsidies are not considered rental assistance under ESG and therefore, they do not trigger the use with other subsidies restriction.

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 or agreement 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 City of Detroit encourages prevention providers to assist residents in negotiating their lease or rental contract in order to ensure long term housing stability.

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:

- The program participant moves out of the housing unit for which the program participant has a lease
- The lease terminates and is not renewed OR
- 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.

Conflicts of Interest

In accordance with [24 CFR 576.404](#), no type or amount of ESG assistance can be conditioned on an individual or family's acceptance of housing owned by the recipient, subrecipient, contractor, parent, or subsidiary of the subrecipient. In addition, no subrecipient (nor any of its parent or subsidiary organizations) that owns housing, carried out the initial evaluation under 24 CFR 576.401, or administered homelessness prevention assistance for occupants of that subrecipient's housing.

Organizations are required to have policies and procedures to prevent organizational conflicts of interest.

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](#).

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 and Lead-Based Paint Requirements

All units occupied by or anticipated to be occupied by prevention participants must meet minimum quality standards for inspection and lead-based paint. See Appendix IV for information regarding inspection requirements and Appendix V for information regarding lead-based paint requirements.

Section 10: Homeless Management Information System (HMIS)



Overview

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](#).

Note: It is the subrecipient's responsibility to ensure their programs are set up in HMIS and that staff is properly trained on HMIS policies and procedures. Please reach out to HAND to onboard a new program or staff.

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 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.

Data Quality

Data quality is an integral part of the homelessness response system, as it helps with identifying trends and system gaps, and funding allocations. All organizations entering data in HMIS must comply with the follow data quality requirements:

1. Agencies must require documentation at intake of the homeless status of those they serve according to the reporting and eligibility guidelines issued by HUD.
2. 100% of the clients must be entered into HMIS as close to real time as possible, but if not, within 48 hours of entry or exit. Emergency shelters should attempt to have data entered on the same day of entry or exit. If the information is not entered on the same day it is collected, the agency must ensure that the date associated with the information is the date on which the data was collected.
3. All staff are required to be trained on the [Definition of Homelessness](#).
4. The “First Name”, “Last Name”, “Date of Birth”, and “Gender” fields must be collected to create the client’s unique identifier.
5. The agency must have a process to ensure the First and Last Names are spelled properly and that the date of birth and Social Security numbers are accurate.
6. Income, non-cash benefits and health insurance information must be updated at least annually and at exit, or at the frequency specified by program requirements.
7. Agencies must have an organized exit process.
8. Agency Administrators/staff regularly run data quality reports.
9. CoCs and Agencies are required to review Outcome Performance Reports/System Performance Measures reports defined by HUD and other funding organizations. Measures are based on Project Type. The Local HMIS Lead Agency, in collaboration with the CoC Reports Committee or other designated CQI Committee, establishes local benchmark targets for performance improvement on shared measures.
10. MSHMIS publishes regional benchmarks on all defined measures annually.
11. Agencies are expected to participate in the CoCs Continuous Quality Improvement Plan. See CQI materials designed to support data quality through continuous quality improvement.

Section 11: Eligible Participation and Recordkeeping



Overview

In accordance with [24 CFR 576.500](#), the subrecipient must have policies and procedures to ensure the requirements of this part are met, including those required by [2 CFR part 200](#). The policies and procedures must be established in writing and implemented by the subrecipients to ensure that ESG funds are used in accordance with the requirements. In addition, sufficient records must be established and maintained to enable the recipient and HUD to determine whether ESG requirements are being met.

Homeless Categories

All subrecipients must follow intake procedures to ensure program compliance with the homeless definition outlined below ([24 CFR 576.2](#)). Program must obtain and verify documentation of homelessness upon intake.

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 each program section for additional information.

Record Keeping Requirements

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 upon intake, 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.

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

Documenting Homeless Status

In accordance with record keeping requirements outlined in [24 CFR 576.500\(b\)](#), all programs must require documentation of homelessness status at time of intake. Obtaining evidence of homelessness should follow the following order of priority:

1. Third-party documentation
2. Intake worker observations
3. Self-certification

Please note that lack of third-party documentation should not prevent an individual or family from immediately being admitted to an emergency shelter or receiving outreach services.

The sections below outline the required documentation and order of priority for obtaining evidence of homelessness.

Street Outreach

Eligibility

Street outreach programs must serve who qualify as homeless under paragraph (1)(i) of the “homeless” definition under [§ 576.2](#). This includes an individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: they have a primary nighttime residence that is a public or private place not meant for human habitation.

Category 1: Literally Homeless Clients

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:

1. Written observation by the outreach worker of the conditions where the individual or family was living,
2. Written referral by another housing or service provider
3. Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter

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:

1. Written observation by the outreach worker
2. Written referral by another housing or service provider
3. Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter **and**
 - i. 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
 - ii. 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

Eligibility

- 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

Category 1: Literally Homeless Clients

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. Any of the following forms of documentation may be used, however the priority of types of documentation are as follows:

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

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:

1. Written observation by the outreach worker
2. Written referral by another housing or service provider
3. Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter **AND**
 - i. 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**
 - ii. 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.

Category 4: Fleeing/Attempting to Flee Domestic Violence Clients

For Victim Service Providers:

- 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:

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

Rapid Re-housing

Category 1: Literally Homeless Clients

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. Any of the following forms of documentation may be used, however the priority of types of documentation are as follows:

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

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:

4. Written observation by the outreach worker
5. Written referral by another housing or service provider
6. Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter **AND**
 - iii. 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**
 - iv. 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.

Category 4: Fleeing/Attempting to Flee DV

For Victim Service Providers:

- 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:

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

Homelessness Prevention

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

Category 2: Imminent Risk of Homelessness Clients

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 **OR**
- 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 **OR**
- 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**
 - Certification that no subsequent residence has been identified **and**

- 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

Category 4: Fleeing/Attempting to Flee Domestic Violence Clients

For Victim Service Providers:

- 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:

- 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.
- Certification by the individual or head of household that no subsequent residence has been identified
- 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: 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:

- 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.
- 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.
- 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](#)

- 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:
 - Source documents (e.g., notice of termination from employment, bank statement, or health care bill showing arrears)
 - 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
 - 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
- 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:
 - Source documents that evidence one or more of the conditions.
 - 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
 - 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.

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:

- Runaway and Homeless Youth Act
- Head Start Act
- Subtitle N of the Violence Against Women Act of 1994
- Section 330 of the Public Health Service Act

- The Food and Nutrition Act of 2008
- Section 17 of the Child Nutrition Act of 1966

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.

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:

1. 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.
2. 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.
3. 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.

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://files.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual-2024.pdf>

- Clients must 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.

Universal Data Elements

Universal data elements are those which all HMIS participating continuum projects are required to complete. It is important to note that federal funding sources (programs) often require the projects they fund to maintain and report on additional data elements – identified as Program Specific elements.

HMIS Universal Data Elements are elements required to be collected by all projects using the software as an HMIS. Projects funded by any one or more of the federal partners must collect the Universal Data Elements as are projects that are not funded by any federal partner (e.g. missions) but are entering data as part of the Continuum of Care's HMIS implementation.

Universal data elements enable the HMIS the ability to record unique, unduplicated client records, establish participation in a project within a date range, and identify clients who meet time criteria for chronic homelessness.

The Universal Data Elements include:

- 3.01 Name
- 3.02 Social Security Number
- 3.03 Date of Birth
- 3.04 Race and Ethnicity
- 3.06 Gender
- 3.07 Veteran Status
- 3.08 Disabling Condition
- 3.10 Project Start Date

- 3.11 Project Exit Date
- 3.12 Destination
- 3.15 Relationship to Head of Household
- 3.16 Client Location
- 3.20 Housing Move-in Date
- 3.917 Living Situation

Refer to the [HUD's HMIS Data Standards Manual](#) for universal data elements requirements. Refer to Table 2 for program specific data elements.

Program Specific Data Elements

#	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
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.

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](#).

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:

1. 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.
2. 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.
3. 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.

Section 12: Grant Administration



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.

To request an environment review please fill out this [form](#).

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:

- 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.
- 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.
- 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.
- 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](#)).

- 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.

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.

Section 13: Program Monitoring



Overview

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 procedures apply to all program types (Emergency Shelter, Warming Center, Prevention, Rapid Re-Housing, Street Outreach) but may slightly differ depending on program type. For example, Emergency Shelters and Warming Centers undergo building inspections where this does not apply to other non-site based program types. 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 and according to its Monitoring Policy. 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 services for people who experience homelessness, within the constraints of the regulations. The City of Detroit does not intend to use the monitoring compliance process in a punitive, negative way.

Monitoring Process

Each year, the City of Detroit will establish the level of monitoring they will conduct based off of a risk assessment. This risk assessment is based on the determined financial and programmatic risk. If an agency or program is among those the City of Detroit determine to be monitored, the City of Detroit will reach out and inform that agency thirty (30) days 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. Financial Monitoring is completed by the City of Detroit's Office of the Controller. Based on the City of Detroit HRD's established policies for homeless programs, programmatic monitoring will occur on site at least bi-annually. 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 mentioned risk assessment will determine if the subrecipient is at high, medium, or low risk. The level of risk determines the type of monitoring performed. After monitoring is concluded, HRD will send their report within sixty (60) days of the date that the provider submits the materials. If there are any concerns or findings in the HRD report, providers are then required to submit their corrections within two (2) weeks.

On-Site Monitoring

On-site monitoring involves staff from the City of Detroit working on-site at the 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 ESG financial and program 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 where they can work and review materials, as well as a confidential space where they can speak to managers, staff, and clients.

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. City of Detroit staff will also conduct an inspection of the building with the [ESG Minimum Habitability Standards For Emergency Shelter Checklist Tool](#).

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.

Desk Monitoring

Desk 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 as they wish.

The subrecipients will be required to submit 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.

After the On-Site or Desk Monitoring Visit

Within sixty (60) days of the date the subrecipient submits their materials, days, the City of Detroit will send a report summarizing the monitoring activities and any concerns or findings that need to be corrected.

This report will include one or more of the following:

- Concerns, which is a deficiency in program performance not based on a statutory, regulatory, or other program requirement. Monitoring concerns that are not addressed become a monitoring finding.
- Finding, deficiency in program performance based on material noncompliance with a statutory, regulatory, or program requirement for which sanctions or other corrective actions are authorized. No areas of concern or findings noted during the monitoring visit

If the letter outlines a concern or finding, it will also include a summary of the reason that the City of Detroit has classified the issue as a concern or 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 concern or finding has been corrected, and that the City of Detroit has acknowledged this in writing, that each concern or finding will remain open. This may have implications for future applications for ESG funding.

Section 14: Appendices

Appendix I: 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:

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.

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).

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

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.

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. "Occurrences" 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 to Housing Final Rule](#).

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:

1. Homelessness is first and foremost a housing crisis and can be addressed through the provision of safe and affordable housing.
2. 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.
3. 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."
4. 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.
5. People experiencing homelessness have the right to self-determination and should be treated with dignity and respect.
6. The exact configuration of housing and services depends upon the needs and preferences of the population.

All program models funding through Homelessness Solutions must adhere to Housing First principles.

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.

The Homeless Action Network of Detroit (HAND) serves as Detroit HMIS Lead Agency. More information about HMIS can be found on their website at <https://www.handetroit.org/hmis>

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 [HUD Exchange Rapid Re-Housing: ESG vs CoC guide](#).

For more information about calculating rent reasonableness and FMR, please review the HUD Exchange resource [Rent Reasonableness and Fair Market Rent Under the Emergency Solutions Grants Program](#).

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 [HUD Notice PIH-2017-08 \(HA\), Violence Against Women Reauthorization Act of 2013 Guidance](#).

Appendix II: Grant Closeout and ESG Match Documentation

At the end of the grant term subrecipients will receive a Grant Closeout Certification. The Grant Closeout Certification must be filled out, signed, and include documentation of ESG match (if applicable).

City of Detroit Subrecipient Grant Closeout Certification

SUBRECIPIENT NAME:

CPA#

SPO#

FUNDED ACTIVITY:

CONTRACT TERM:

HUD FISCAL YEAR:

The Subrecipient hereby certifies that all financial, performance, and other reports as required by terms and conditions of the Federal award have been submitted and that: (1) the financial requirements as described in the City of Detroit contract have been performed in accordance with the terms and conditions of the executed agreement and applicable statutory and regulatory requirements and that there are no known outstanding programmatic or financial issues; and (2) all data provided below fairly reflect costs and sources of funds. In accordance with federal closeout requirements ([§ 200.344 Closeout.](#)) *“The federal awarding agency or pass-through entity will close out the Federal award when it determines that all applicable administrative actions and all required work of the federal award have be completed by the non-Federal entity.”*

City of Detroit HRD Program Manager to Complete:

Financial Information	ESG	CDBG	ESG-CV	CDBG-CV
Total Grant Amount Funded				
Total Approved Reimbursement Amount Submitted for Grant Year				
Balance of Grant funds Remaining				
Grant Funds Recaptured (if applicable)				

Data Requirements	
Cumulative Accomplishment and Performance Reports Data Submitted	

Recording Keeping and Match Requirements: 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](#). 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](#).

Subrecipient to complete:

ESG Match Documentation	
Please Indicate the Amount of Match Required	\$49,926.85
Source of Funding Used for Match	
Supporting Documentation for Match Funding Attached (Refer to Federal regulations for more details on the type of support required)	

As indicated in the City of Detroit ESG Manual (Appendix A), prior to the release of the last payment of the grant award ESG subrecipients must demonstrate they have met their match requirement. By signing below, you acknowledge that your organization met the required 100% match for ESG funding, and you attest that all applicable administrative actions and all required work of the federal award have been completed and that all the information listed in this document is accurate and final.

Print: _____ **Signed:** _____ **Date:** _____
 Subrecipient's Authorized Representative

Print: _____ **Signed:** _____ **Date:** _____
 Reviewed and Approved by COD Program Manager

Appendix III: Documenting Income for RRH and Prevention

The table below outlines sources of income and how they need to be documented in accordance with [24 CFR 5.609](#).

Rapid Re-Housing providers are not required to verify income at intake but must verify income during the annual recertification.

Prevention providers verify income at intake and every 3 months.

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

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.

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)

Appendix IV: Rental Unit Inspection Requirements

Overview

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.

The Detroit CoC has also established more stringent standards and requires all Rapid Rehousing units to pass Housing Quality Standards (HWS) inspections. This helps ensure that units meet requirements of the HCV program, should a participant lease-up with an HCV voucher.

It is important to note that while in most respects, HQS is more stringent and detailed than the ESG minimum standards, the ESG standards for fire safety are more specific. Agencies must notify inspectors of these requirements, amend their HQS inspection checklists, and ensure all units meet the more stringent inspection for fire safety.

ESG Habitability Standards

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](https://www.hudexchange.info/resources/documents/ESG-Emergency-Shelter-and-Permanent-Housing-Standards-Checklists.docx)

Further details on ESG Minimum Habitability Standards, as well as a comparison of ESG Minimum Standards and HQS, may be found here:

<https://files.hudexchange.info/resources/documents/ESG-Emergency-Shelter-and-Permanent-Housing-Standards.pdf>

Housing Quality Standards and NSPIRE

The [National Standards for the Physical Inspection of Real Estate \(NSPIRE\)](#) is a new physical inspection protocol that has become the primary method for HUD physical inspections and will replace HQS inspection requirements for Rapid Rehousing Providers, projected October 2025

HUD's stated purpose in developing and implementing a new inspection protocol is to move its inspections to a system that prioritizes health, safety, and functional defects over appearance to produce inspection results that better reflect the true physical condition of a property. In practice, this approach means a move away from Housing Quality Standards (HQS) and Uniform Physical Condition Standards (UPCS) systems that often resulted in uneven application of standards across the country and could encourage quick fixes that did not always meet industry standards.

All Rapid Rehousing providers will be required to use the new NSPIRE inspection protocol per HUD's announced date of compliance for HCV and PBV programs, projected October 2025.

More information on NSPIRE can be found here:

https://www.hud.gov/program_offices/public_indian_housing/react/nspire

Appendix V: Lead-Based Paint 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 or Rapid Rehousing **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.

- **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.

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. 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.

Appendix VI: 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 two 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.

Emergency Operations Center: Physical location at which the coordination of information and resources to support incident management (on-scene operations) activities normally takes place.

Emergency Support Functions: Emergency Support Functions (ESF) serve as grouping mechanisms for governmental and private sector support functions. ESFs organize emergency response efforts through a unified command structure to improve efficiency and maximize resources.

Code Blue (Excessive Cold Temperatures)

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

Code Red (Excessive Heat Temperatures)

- A heat index of **105 degrees** Fahrenheit 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. The agency is 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 after the City of Detroit has sent confirmation that the severe weather situation has concluded. If a client becomes physically violent, staff are encouraged to call the police.
- If a shelter does not have space during severe weather, the agency must either a) let the household remain at the shelter, utilizing an or another arrangement for overnight accommodations; or b) secure another shelter bed and arrange for transportation to that shelter.
- 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). 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.

Appendix VII: ESG Minimum Habitability Standards

The Emergency Solutions Grants (ESG) Program interim rule, at 24 CFR 576.403, establishes minimum standards for safety, sanitation, and privacy in emergency shelters and warming centers that are ESG funded.

Note: This document does not describe how to conduct an inspection, as City of Detroit staff will conduct the inspections. Nor does it address the lead-based paint requirements, which can be found at 24 CFR part 35.

Minimum Standards for Emergency Shelters

Whenever 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 provided in §576.403(b), also listed in Appendix A. If cash or non-cash contributions (e.g. funds or staff time) used for renovation or shelter operations are to be contributed to the recipient's ESG program as match, the emergency shelter must meet the minimum standards, because all matching contributions must meet all requirements that apply to the ESG funds provided by HUD (§576.201(c)).

Note: The same standards apply regardless of the amount of ESG funds involved. For example, a shelter that receives \$1,000 in ESG funds to replace a water heater is subject to the same standards as a shelter that receives \$80,000 for operating costs.

The recipient or subrecipient must be sure to maintain documentation of compliance with the minimum standards for Emergency Shelter activities in the program's records.

Renovation

Any building for which ESG funds are used for conversion, major rehabilitation, or other renovation must meet:

- The minimum safety, sanitation, and privacy standards under §576.403(b); **and**
- State or local government safety and sanitation standards, as applicable. In addition:
- If the recipient established any other standards that add to or exceed HUD's minimum standards, the recipient/subrecipient must ensure that the shelter meets these standards.
- An inspection to ensure that the building meets all of the minimum standards must be completed when the renovation is complete and before the shelter is occupied.
- The shelter should follow the minimum standards for as long as the minimum period of use requirement is in place for the facility (10 years for major rehabilitation and conversion, or 3 years for other renovation)
- The recipient should be involved in planning the renovation up front to ensure that the renovation work will result in the shelter meeting the minimum standards.

Shelter Operations

Any emergency shelter that receives ESG funds for shelter operations (including minor repairs) must meet the minimum safety, sanitation, and privacy standards under §576.403(b).

In addition:

- If the recipient established any other standards that add to or exceed HUD's minimum standards, the recipient/subrecipient must ensure that the shelter meets these standards.
- The shelter must be inspected on-site to ensure that it meets the minimum standards before ESG funds are provided for shelter operations.
- The shelter must meet all standards for the entire period during which ESG funds are provided for operating the emergency shelter. For example, if operating assistance is provided for 24 months, the shelter must remain in compliance with the minimum standards for those 24 months.
- If the shelter fails to meet the minimum standards, ESG funds (under either shelter operations or renovation) may be used to bring it up to the minimum standards.
- If the shelter continues to receive ESG shelter operating funds over a period of time, then a periodic, on-site inspection must be conducted each time the shelter receives funds. For example, if the shelter receives an annual allocation of funds from the ESG recipient, an inspection must be conducted annually.
- If the recipient/subrecipient moves the shelter to a new site or structure, that new site or structure must meet all emergency shelter standards for the remaining period that ESG funds are used for operating expenses.

See link below for the ESG Minimum Habitability Standards for Emergency Shelters Tool:

<https://www.hudexchange.info/resource/3766/esg-minimum-habitability-standards-for-emergency-shelters-and-permanent-housing/>

Minimum Standards Do Not Apply to Essential Services and HMIS Activities

- The minimum standards for emergency shelters only apply when ESG funds are used for **shelter operations, conversion, major rehabilitation, or other renovations**.
- **Essential services** provided under the Street Outreach and Emergency Shelter components do not trigger either the minimum standards for emergency shelter or the minimum standards for permanent housing. This is because there is no unit to inspect; these services are provided for persons who are sleeping in emergency shelters or 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.
- Likewise, the minimum standards do not apply to an emergency shelter (or other organization) receiving ESG funds only for **HMIS** costs.

Appendix VIII: Prevention Screening Tool

The Detroit Homelessness Prevention Tool is designed to help staff with the following functions:

1. Verify household eligibility for homelessness prevention
 - a. Imminent risk of literal homelessness (within 14 days)
 - b. Very-low income status (under 50% AMI ESG-CV only; 30% AMI ESG)
2. Identify and prioritize the most vulnerable households most likely to be literally homeless if they do not receive prevention assistance

Part 1: Eligibility	
A. Household is at imminent risk of literal homelessness. Without prevention assistance, household is likely to be literally homeless within the next 14 days.	
B. Household is very-low income (below 50%/30% AMI)	
	Check
Housing Status	
Identify the primary place where the client is staying:	
<i>Can you tell me about the place you stayed last night? Is this the primary place you stay, or is there somewhere else you normally stay? (Check 1 below)</i>	
Hotel or motel paid for without emergency shelter voucher	
Staying or living in a family member's room, apartment or house	
Staying or living in a friend's room, apartment or house	
Rental by client, no ongoing housing subsidy	
Rental by client, with other ongoing housing subsidy	
Permanent housing for formerly homeless persons (e.g., CoC Program funded unit)	
Owned by client, no ongoing housing subsidy	
Owned by client, with ongoing housing subsidy	
Hospital or other residential non-psychiatric medical facility	
Long-term care facility or nursing home	
Jail or prison	
Residential project or halfway house with no homeless criteria	
Psychiatric hospital or other psychiatric facility	
Substance abuse treatment facility or detox center	

Other (describe):	
Do you have to leave this place (or the place you normally stay) within 14 days?*	
<i>**IF NO, STOP HERE: Client is <u>not</u> eligible for prevention resources</i>	
Identify why the client must leave the primary place they are staying: <i>What's causing you to have to leave? (Check 1 below):</i>	
Court-ordered judgement to vacate rental unit*	
<i>**IF YES, STOP HERE: See Eviction Prevention Tool</i>	
Written or verbal notice from family, friend or host to leave doubled-up housing	
Exiting an institution or system of care (e.g., hospital, jail, treatment facility, etc.)	
Insufficient resources to continue to pay for hotel or motel	
Other (describe):	
Income Status	
Household size:	
A. Total annual gross income (from all sources):	
B. 30%/50% of Area Median Income for household size:	
Is total annual gross income (A) less than 30/50% of area median income (B)?	
<i>**IF NO, STOP HERE: Client is <u>not</u> eligible for prevention resources</i>	

Part 2: Targeting		
Use the following questions to determine household prioritization for resources:		
	Check	Points
Urgency of Housing Situation		
Current housing loss expected in: (check 1 below)		
• 0-6 days		5

• 7-14 days		4
Vulnerabilities & Housing Barriers		
Income		
Have you experienced a sudden & significant loss of income (50% or more) (including employment and cash benefits) within the last 60 days AND/OR Uncontrollable & significant increase in non-discretionary expenses (ie rent, medical expenses, etc.) in the last 60 days due to COVID-19?		3
Household Annual Gross Income Amount: (check 1 below)		
• No income (ie unemployed, no cash benefits)		5
• 1-14% of AMI for family size		4
• 15-30% of AMI for family size		3
• 31-40% of AMI for family size		2
• 41-50% of AMI for family size		1
Household demographics		
Major change in household composition (ie death of family member, divorce by head of household, new child) in the last 6 months that directly affects ability to secure or maintain housing		3
Senior over the age of 55		3
Household size of 5 persons or larger		3
Household member is pregnant		3
At least 1 dependent child under 6		3
Single parent		3
Any household member has a disability that severely impedes the ability to maintain housing independently		2
Criminal History		
Household member was recently (within the last 6 months) discharged from an institution (jail, hospital, etc.)		4
Criminal record for arson, drug dealing or manufacture, felony offense against persons or property		4
Registered sex offender		5
Census Tract		

Resides in a prioritized census tract		5
Housing History		
Head of Household has been homeless one or more times in the last 3 years		3
Prior rental evictions (in the last 3 years): (check 1 below)		
• 4 or more rental evictions		5
• 2-3 rental evictions		4
• 1 rental eviction		3
How many times have you moved (not related to evictions) in the last year: (check 1 below)		
• 4 or more moves		5
• 2-3 moves		4
• 1 move		3

Score Range	Eligibility
0-15	Light Touch - Resources only <i>Non-monetary assistance, including referrals to Detroit at Work, Wayne Metro.</i>
16-35	One-Time Assistance <i>“Prevention” assistance: one month rent, security deposit, utility payment, moving costs, rental / utility arrears</i>
36+	Short-term assistance <i>“Longer-term prevention” Rental assistance not to exceed 3 months</i>

Appendix IX: Detroit CoC Emergency Shelter Community Standards

The City of Detroit’s Homelessness Solutions (HS) team, with the support of our ESP partners is committed to improving our homeless system by ensuring it is designed to benefit and help individuals and families in need. To accomplish this, the HS team has worked alongside the shelter providers within our community over this past year to develop community standards. We wish to continue to improve our system’s *low-barrier* approach and ensuring person-centered services and evidence-based practices are in place to increase positive client outcomes to permanent housing.

This is an effort to reduce barriers and overly restrictive rules, while still maintaining structure, to allow clients to receive the most supportive and consistent services possible. These community standards will also help to create a more consistent and standardized approach from **all** shelters in our CoC.

The Community Standards established in 2023 will go into **effect January 2024**. At this time, we ask that your agency ensures training and communication is provided to all staff and clients to easily adapt to this upcoming system change. In addition, please ensure to update your policies and procedures to reflect the changes in the Community Standards.

We appreciate your continued effort and look forward to supporting you on this effort.

For any questions, concerns, or general feedback, feel free to contact your City of Detroit Contract Manager or Emergency Shelter specialist.

Community Standards	
Topic	Standard
1. Curfews	Curfew can be no earlier than 9pm on weekdays and no earlier than 11pm on weekends. Clients are expected to be in the shelter no later than the established time, with exceptions to work schedules, prior notice from appointed staff and/or emergency situations, and after-hours/walk-ins clients.
2. Bed Holding/Permissions for Overnight Stays	Shelter beds will be held for a period of one night of a person’s absence from the shelter. Flexibility with clients given certain circumstances requires pre-approval. All shelters should have a clear process for holding beds in the case of extenuating circumstances. Additionally, the staff member should document this in a HMIS case note.
3. Client Work Schedules	To eliminate any issues of not being able to meet curfew and being denied entry, client’s employment status should be established at intake or when employment is gained. Shelters should not require clients to provide documentation to prove their employment; Self-declaration of employment will suffice as appropriate documentation. However, if the client

	works past shelter curfew, then additional information <i>can</i> be requested.
4. Daytime Access for Clients	Provisions and exceptions, for daytime access should be provided, dependent on client situation; exceptions need to be made for clients who are sick, employed on alternative shifts, non-school aged children and their mothers, and seniors.
5. Service Animals	The City of Detroit requires all ESG-funded shelters to comply with Americans with Disabilities Act (ADA) and to ensure provisions for services are made for those who have a service animal.
6. Bans/Suspensions	Involuntary exits (i.e. bans) should be limited to extreme cases, such as physical violence or the use of a weapon. Bans have to be entered in HMIS within 24 hours and cannot last longer than 6-months. Clients will be allowed to re-enter shelter after the ban expires.
7. Personal Items	Entering shelter with personal items need to be as low-barrier as possible (will look different depending on each shelter's space availability). As part of client's discharge/termination, if needed, shelters should hold client's personal items for 7 business days after the client has exited.
8. Overflow Protocols	If the shelter accepts walk-in/overflow, that client should be entered in HMIS and connected with CAM the next business day; CAM will assist with connecting client with navigation services and potential shelter placement, when available.