
CITY OF CAMBRIDGE EMERGENCY SOLUTIONS GRANT PROGRAM STANDARDS

ADOPTED 7/6/2017



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A. Introduction

The Cambridge Continuum of Care (CoC) is responsible for coordinating and implementing a system to address the needs of both people experiencing homelessness and those who are at risk of homelessness within the City of Cambridge. The [Emergency Solutions Grant \(ESG\) Program Interim Rule](#) and the [Continuum of Care Program Interim Rule](#) state that the CoC must, in consultation with recipients of ESG Program funds within its geographic area, establish and consistently follow written standards for providing ESG assistance.

All projects (subrecipients) receiving ESG funding from the U.S. Department of Housing and Urban Development (HUD) through the City of Cambridge (the recipient) are required to abide by these written standards. Projects that do not receive ESG funding are encouraged to adopt these standards. These standards will:

- Ensure that persons experiencing homelessness in the City will be given standardized information and support to access interventions to address housing instability;
- Establish community-wide expectations on the operation, quality, and equity of ESG funded projects; and
- Ensure ESG project transparency across the City of Cambridge; and
- To make the most efficient use of limited funds.

B. General Requirements

1. ESG funded Emergency Shelters and Street Outreach projects are required to refer project participants to the CoC's Coordinated Entry system – the Cambridge Coordinated Access Network (C-CAN) – for assessment and prioritization for housing and services.
2. ESG funded projects must conduct an initial evaluation to determine each project participant's eligibility for ESG assistance and the amount and types of assistance the household needs to regain stability in permanent housing.
 - a. When a household is found to be ineligible for assistance, the ESG funded project must retain documentation of the reason for the ineligibility determination.
3. ESG funded projects must connect participants to mainstream resources and benefits including assistance in obtaining permanent housing, medical health treatment, mental health treatment, counseling, and other services essential for achieving independent living. Participants must also be connected to other Federal, State, local, and private assistance available to assist the participant in obtaining housing stability including: Medicaid; SNAP; WIC; Unemployment Benefits; SSI/SSDI; TAFDC/EAEDA; Federal, State, or local subsidized housing; any other program or assistance available to meet the needs of the participant and allow that person to regain stability in permanent housing.
4. ESG funded projects must abide by the following termination procedure in order to preserve project participants' rights:
 - a. Provide participants with a complete list of project rules and consequences for violation of those rules prior to enrollment;
 - b. Examine all extenuating circumstances surrounding the decision to terminate and opt to terminate only in the most severe cases;
 - c. Provide written notice to participant containing a clear statement of the reason for termination;
 - d. Allow the participant to (1) request that the decision to terminate be reviewed by someone other than the person who made the initial termination decision or a subordinate of that person, and (2) present oral or written statements objecting to the termination;
 - e. Issue prompt written notice of the final, post-review decision; and

- f. Inform terminated participant that the termination does not mean that he or she cannot seek services from the ESG funded service provider in the future.
5. ESG funded projects that serve households with children must:
 - a. Have a staff person designated as the educational liaison that will ensure children are enrolled in school and connected with appropriate services in the community, including early childhood programs such as Head Start, Part C of the Individuals with Disabilities Education Act, and the McKinney Vento education services;
 - b. Not discriminate on the basis of age and/or gender of children when considering housing options. To prohibit involuntary family separation, the age of a child under 18 cannot be used as a basis for denying any family's admission to an emergency shelter.
6. ESG funded projects must abide by Federal, State, and local nondiscrimination, Civil Rights and Disabilities laws.
7. ESG funded projects shall not engage in or require as part of project services, inherently religious activities such as worship or religious instruction. These activities may be conducted separately from project services and must be voluntary for project participants.
8. ESG funded projects must write, adopt, and abide by policies and procedures that conform to the program rules of the U.S. Department of Housing and Urban Development (HUD) and these Written Standards. Project policies and procedures must cover the following topics:
 - a. *Coordinated Entry participation*: a policy for receiving referrals from C-CAN and making referrals to C-CAN including identification of the project staff position(s) responsible for C-CAN participation.
 - b. *Eligibility*: the complete list of project eligibility criteria including how each criterion will be evaluated and documented.
 - c. *Service delivery*: policies and procedures for delivering services to project participants including the full array of services available.
 - d. *Project rules*: a complete list of all rules and the consequences for violating those rules.
 - e. *Termination procedure*: the complete process for initiation of termination proceedings, making appeals, and issuing a final termination decision.
 - f. *Document collection*: a list of documents that must be collected from project participants, how often they must be collected, and the priority with which documents will be received (i.e. third-party documentation over self-certification).
 - g. *HMIS participation*: the process by which releases of information are collected and information is entered into the Homeless Management Information System (HMIS) in a timely manner.
 - h. *Confidentiality policy*: a policy describing how project participant records will be kept confidential and physically secure as well as the process by which project participant information will be released to third parties (i.e. a policy on how releases of information are collected and used).
 - i. *Fiscal policies and procedures*: policies and procedures describing procedures and responsibilities for approving ESG expenses and requests for reimbursement; and documentation procedures to show: that ESG funds are spent on allowable costs in accordance with requirements for eligible activities; records of the source and use of contributions made to satisfy the matching requirement described in § 576.201 of the ESG Interim Rule; and records of the receipt and use of program income.
 - j. *Conflicts of interest*: a policy describing compliance with the organizational conflicts of interest requirements described in § 576.404 of the ESG Interim Rule.
 - k. *Homeless participation*: a policy describing compliance with the homeless participation requirements described in § 576.405 of the ESG Interim Rule.

- I. *Affirmative outreach*: a policy stating the use of the subrecipient's facilities, assistance, and services are available on a non-discriminatory basis as well as the steps the subrecipient shall take to communicate with persons with disabilities.

C. Occupancy Standards and Inspection Requirements

All ESG funded shelters and housing units assisted with ESG funded Homelessness Prevention or Rapid Rehousing must meet applicable federal, state and local safety, sanitary and habitability requirements. At least annually, as long as the shelter or housing unit is assisted with ESG funds, an inspection must be conducted showing that the shelter or housing unit meets the following minimum requirements:

1. Buildings must be structurally sound to protect from the elements and not pose any threat to health and safety of the residents.
2. Must be accessible in accordance with Section 504 of the Rehabilitation Act, the Fair Housing Act and the Americans with Disabilities Act where applicable.
3. Must provide participants with an acceptable place to sleep and adequate space and security for themselves and their belongings.
4. Each room must have a natural or mechanical means of ventilation.
5. Must provide access to sanitary facilities that are in operating condition, private and clean.
6. Water supply must be free of contamination.
7. Heating/cooling equipment must be in working condition.
8. Must have adequate natural or artificial illumination and adequate electrical resources to permit safe use of electrical appliances.
9. Food preparation areas must have suitable space and equipment to store, prepare and serve food in a safe and sanitary manner.
10. Building must be maintained and in a sanitary condition.
11. Must be at least one smoke detector in each occupied unit of the project; and where possible near sleeping areas. The fire alarm system must be designed for hearing-impaired participants. There must be a secondary means of exiting the building in case of fire or other emergency.

D. HMIS Requirements

All ESG funded projects must collect, record, and make available to the CoC's HMIS Lead Agency (Cambridge Department of Human Service Programs) data that is necessary to determine: (1) unduplicated counts of the number of homeless individuals and families accessing service; (2) demographic characteristics of homeless individuals and families; and (3) patterns of service use within the community.

To fulfill this requirement, ESG projects shall participate in one of the following instances of HMIS: (1) Cambridge HMIS; (2) ASIST HMIS; (3) Boston HMIS; or (4) an instance that is specific to and administered by the subrecipient agency. If the project chooses to utilize Option (2), (3) or (4), the ESG project must be configured in HMIS in such a way that the project is able to provide data to the HMIS Lead Agency in HUD HMIS Comma-Separated Value (CSV) format.

E. Recordkeeping Requirements

All ESG-funded projects must keep the following documentation relative to their ESG project:

1. Agency Level: Subrecipient shall collect and retain Agency-level records related to the following:
 - a. Documentation of Non-profit Status
 - b. Conflicts of Interest
 - c. Homeless Participation
 - d. Annual Audit
 - e. Certificate of Authority
 - f. Accounting policy
2. Project Level: Subrecipient shall retain documentation of the following project-level policies and procedures:
 - a. Required Policies and Procedures
 - b. Job Descriptions
 - c. Documentation of the reason for any ineligibility determinations
3. Participant Level (All ESG-funded projects): Subrecipient must collect and keep the following records as a part of the Project Participant file:
 - a. Homeless Status: At intake, Subrecipient must collect third party evidence—including HMIS records—that the project participant meets HUD’s homeless definition immediately before enrolling in the project. If the Subrecipient is not able to obtain third party documentation it may accept written observation from an outreach worker attesting that the outreach worker observed the household lived in a situation that meets HUD’s homeless definition immediately before enrolling in the project. If neither third party documentation nor outreach worker observations are available the Subrecipient may allow the household to self-certify that it lives in a situation meeting HUD’s homeless definition immediately prior to seeking enrollment in the project.
 - b. Receipt of Program Rules
 - c. Compliance with Termination Procedures (if applicable)
 - d. Receipt of Confidentiality Policy
 - e. HMIS Release of Information
 - f. Other Releases of Information
 - g. Assessment of Service Needs
 - h. Connection to Mainstream Benefits and Resources
4. Participant Level (Homeless Prevention and RRH): In addition to the project participant documentation listed above, Homeless Prevention and RRH projects must also collect the following:
 - a. Housing Stability Plan(s)
 - b. Proof of Monthly Case Management
 - c. Proof of Quarterly and/or Annual Reassessment
 - d. Lease
 - e. HQS Inspection
 - f. Income (when required)
5. Fiscal Documents: The following documents relative to the ESG-funded project must be retained:
 - a. Documentation of all costs charged to the grant.
 - b. Documentation that funds were spent on allowable costs.
 - c. Documentation of the receipt and use of program income.
 - d. Documentation of compliance with expenditure limits—including Fair Market Rent-and deadlines.
 - e. Documentation of amount, source and use of match contribution.

F. Standards for Providing ESG Assistance

The standards described in this section specify community-wide standards and expectations for the provision of ESG assistance. All ESG-funded projects must consistently follow these standards, and other community providers are encouraged to adopt the same standards.

1. HOMELESSNESS PREVENTION

Homelessness Prevention services include (1) Support for Tenants at Risk (STAR); (2) City Prevention; (3) Any other project that is established for the purposes of preventing homelessness or assisting households to regain and/or maintain housing stability that is made available to residents of the City of Cambridge.

a. Assessment & Accessing Prevention Assistance

All households presenting with housing instability at: (1) any ESG funded service location; or (2) Summary Process Sessions at the Cambridge District Court will be screened and prioritized for Homelessness Prevention services. Households presenting at ESG service locations will be referred to the Cambridge Multi-Service Center for the Homeless (MSC) for administration of the Prevention Screening Tool, which evaluates eligibility for assistance.

b. Prioritization

Households determined eligible for Homelessness Prevention services will be prioritized to receive services within each available Homelessness Prevention service by ability to meet additional project criteria – detailed below – and by date on which housing will be lost, with those households closer to this date prioritized over those households further away from this date. Eligible participants referred by STAR partners shall be prioritized for STAR services.

c. Eligibility Criteria for Homelessness Prevention

Project participants must provide documentation of the following eligibility criteria before receiving STAR or City Prevention services:

- i. Meet HUD's At Risk of Homelessness Definition or Category 2, Category 3, or Category 4 (provided that a household meeting the criteria of Category 4 is not sleeping in a place described in Category 1) of HUD's Homeless Definition.
- ii. Have income below 30% Area Median Income (AMI) as established by HUD using the income evaluation methodology detailed at 24 CFR 5.609.
- iii. Unable to resolve housing crisis without ESG assistance.
- iv. Must be capable of sustainability in housing when Homelessness Prevention assistance ends.
- v. Must not have previously exhausted service limitations.

Additional Eligibility Criteria for the STAR Project

- i. Must require comprehensive case management, clinical case management, legal services, mediation services, and/or financial assistance to resolve housing instability.

Additional Eligibility Criteria for City Prevention

- i. Must be able to resolve housing instability with limited case management and/or financial assistance.
- ii. Must currently reside in Cambridge.

Additional Eligibility Criteria for Other Homelessness Prevention projects

Occasionally the City of Cambridge has access to funds intended to prevent homelessness in certain subpopulations such as families with a child under 18, unaccompanied youth age 18-24, the elderly, etc. Eligibility for and availability of these projects is unpredictable. The Cambridge Multi-Service Center will

publically announce when funds are available for homelessness prevention, the eligibility criteria including targeted subpopulation if any, and the amount, type, and duration of assistance.

d. Minimum Standards

In addition to meeting the general standards for providing ESG assistance, Homelessness Prevention providers must meet the following project specific minimum standards:

- i. Project participant must meet with a case manager upon enrollment to create a housing stability plan detailing the amount and type of assistance needed for the participant to become stable in permanent housing;
- ii. Project participant must meet with a case manager at least monthly to assess progress on housing stability plan;
- iii. Project participant must recertify eligibility quarterly;
- iv. Project participant shall only receive 24 months of assistance within any 36 month period (except for case management that is limited to up to 24 months during the period in which the participant is residing in the housing unit);
- v. When applicable, participants shall only receive one payment of up to 6 months of rental arrears in any 36 month period;
- vi. Requests for financial assistance payments totaling over \$4,000 in any 36 month period must receive approval from ESG Homelessness Prevention Program Manager and ESG Contract Manager;
- vii. Participants may receive up to 100% of the cost of on-going utility and/or rental assistance; and
- viii. Financial assistance payments shall be made directly to the third party to which they are owed and not to the project participant.

2. RAPID REHOUSING (RRH)

a. Assessment & Accessing RRH Assistance

All households presenting as homeless at the Cambridge Multi-Service Center will be assessed and eligibility will be evaluated for ESG funded Rapid Rehousing. All households assessed through the CoC's Coordinated Entry system (C-CAN) and deemed eligible for Rapid Rehousing services will be referred to the Multi-Service Center for eligibility verification and prioritization.

b. Prioritization

Households prioritized for ESG RRH will be prioritized by move-in date with those close to a move-in date prioritized over those further away from a move-in date.

Households needing financial assistance shall be prioritized as follows:

- i. Households needing first month's rent, last month's rent, and or a security deposit in order to move into a housing unit;
- ii. Households needing utility payment assistance when the payment(s) are necessary to move into a housing unit;
- iii. Households needing only moving assistance when that assistance is necessary to gaining and/or maintaining stability in a housing unit.

c. Eligibility Criteria

Project participants must provide documentation of the following eligibility criteria before receiving ESG RRH Services:

- i. Must meet Category 1 or Category 4 of the homeless definition (provided the household also lives in a place described in Category 1);

- ii. Must be capable of sustaining housing when RRH assistance ends; and
- iii. Must be capable of moving into a housing unit within 30 days of project enrollment.
- iv. Must have a provable tie to Cambridge.¹
- v. Must not have previously exhausted ESG service limitations.

d. Minimum Standards

In addition to meeting the general standard for providing ESG assistance, ESG RRH providers must meet the following project specific minimum standards:

- i. Participants must meet with a case manager upon enrollment to create a housing stability plan detailing the amount and type of assistance needed for the participant to become stable in permanent housing.
- ii. Participants must meet with a case manager at least once per month to assess progress on housing stability plan.
- iii. Participants must meet with a case manager at least once annually to determine that project participant:
 - does not have income exceeding 30% AMI as established by HUD using the income evaluation methodology detailed at 24 CFR 5.609; and
 - lacks the resources and support networks necessary to retain housing without continued ESG assistance.
- iv. Participants shall only receive 30 days of case management when not residing in permanent housing.
- v. Participant shall only receive 24 months of assistance within any 36 month period (except for case management which is limited to up to 24 months during the period in which the participant is residing in the housing unit).
- vi. Participant receiving ongoing short or medium term rental assistance must pay at least 50% of the contract rent for their housing as ESG RRH rental assistance is limited each month to 50% of the contract rent.
- vii. Requests for financial assistance payments totaling more than \$4,000 in any 36 month period must receive special approval from ESG RRH Program Manager and ESG Contract Manager.
- viii. Financial assistance payments shall be made directly to the third party to which they are owed and not to the project participant.

3. STREET OUTREACH

a. Accessing Outreach Assistance

Outreach staff attempt to engage with all persons encountered during regular routes and canvassing of the City’s geographic area. Outreach staff also respond to calls from providers and members of the public to follow up with specific persons in need of assistance.

b. Eligibility Criteria

Participants must meet the requirements of Category (1)(i) of the HUD definition of homelessness. Street outreach staff must verify that each participant contacted meets this definition, regardless of the participant’s level or likelihood of engagement.

c. Minimum Standards

In addition to meeting the general standards for providing ESG assistance, Street Outreach providers must meet the following project specific minimum standards:

¹ A tie to Cambridge means one of the following: (1) currently residing in an emergency shelter located in Cambridge; (2) residing in St. Patrick’s Shelter for Homeless Women; (3) living on the streets or a place not meant for human habitation in Cambridge; or (4) having a last known address in Cambridge and residing in a shelter or a place not meant for human habitation outside of Cambridge.

- i. Assistance accessing emergency shelter and other crisis services must be offered
- ii. Assistance accessing the Coordinated Entry system (C-CAN) shall be provided so that the project participants may be assessed and prioritized for Permanent Housing placement.

4. EMERGENCY SHELTER

a. Accessing Shelter Assistance

All households presenting as homeless at the Cambridge Multi-Service Center, Coordinated Entry (C-CAN) Access Points, or to Outreach services are provided information, referral, and assistance to access an emergency shelter bed in the City.

b. Eligibility Criteria

- i. Participants must meet the requirements of Category 1, 2, or 4 of the HUD definition of homelessness. Shelter staff must verify that each participant meets this definition, regardless of the participant's level or likelihood of engagement.
- ii. Participants must meet the eligibility criteria established by the shelter project related to subpopulation served (i.e. age, gender, family composition, substance use, etc.).

c. Minimum Standards

In addition to meeting the general standards for providing ESG assistance, Emergency Shelter providers must meet the following project specific minimum standards:

- i. Project must be engaged in one or more of the Emergency Shelter activities defined in 24 CFR 576.102 during at least 51% the project's operating hours;
- ii. Project must not require participants to sign leases or occupancy agreements;
- iii. Project must be staffed with paid or volunteer employees during hours of operation; and
- iv. Assistance accessing the Coordinated Entry system (C-CAN) shall be provided so that the project participant may be assessed and prioritized for Permanent Housing placement.

G. Future Review, Updates and Amendments

These written standards are not only intended to be specific and detailed, addressing unique eligibility requirements for the housing and service resources available, but they are also relevant in the Continuum's work today. To ensure the relevancy of these standards against HUD requirements, the CoC's homeless population and both local and national targeting priorities, the CoC will regularly review and update these written standards.

- a. Changes/ Updates: The Emergency Solutions Grant Program Standards will be reviewed annually. Proposed changes/updates will be brought to the Cambridge CoC Board of Directors for approval.
- b. When reviewing these standards in the future, the CoC's consideration may include:
 - i. Provider feedback on the current written standards;
 - ii. Project participant feedback on the coordinated entry process;
 - iii. The effectiveness and appropriateness of housing and services for current project participants;
 - iv. The CoC's success at meeting the performance standards in Section 427 of the McKinney-Vento Act;
 - v. Changes in the characteristics of the homeless population within the CoC; and
 - vi. Changes in the housing and service resources available in the CoC.