

Big Bend Continuum of Care (CoC)
Emergency Solutions Grant
Rapid Rehousing, Homeless Prevention, and Street Outreach Policies

Rapid Rehousing Component

- 1) **Evaluating eligibility for ESG-RRP assistance** (standards for evaluating each individual's/family's eligibility for assistance):
 - a) Program participants must meet the definition of "homeless" as defined in 5576.2, criteria (1) or (4).
 - i) Individuals/families "at risk of homelessness," and/or those who are about to be evicted, are not eligible for ESG-RRP.
 - ii) Individuals/families who have received assistance through HPRP (Homelessness Prevention and Rapid Rehousing Program) within the past three years are not eligible for ESG-RRP.
 - b) Program participants' households are encouraged to have a sustainable source of verifiable income, which is expected to be sufficient to sustain housing at the completion ESG-RRP assistance.
 - c) Participants' household income must be at or below 50% AMI (Area Median Income).
 - d) A participant may have no income but is expected to gain sustainable income within 90 days of acceptance into the program by acquiring disability, VA benefits, retirement etc. Documentation stating that the income will start on an identified date certain is required in these instances.
 - e) Participants must have consultation with ESG-RRP staff for assessment, evaluation, eligibility determination, and housing stabilization services, as described below.

- 2) **Amount of rent or utilities costs paid by program participants**
 - a) Share of rent/utilities paid by the program participant (guideline for determining what, if any, share of rent/utilities will be paid by the participant while in the program).
 - b) The ESG-RRP funding provides financial assistance related to the costs of obtaining permanent housing as defined by up to a maximum of \$2,000 per household, based upon a needs analysis. Funding can be used to provide one-time assistance or ongoing assistance provided that the ongoing assistance does not exceed \$2,000 per household. The share of rent/utilities that each program participant must pay while in the program shall be determined as a result of each program participant's individual needs. Evidence of this determination must be documented in each participant's case file resulting from the development of an individualized financial assistance strategy. No financial assistance is provided for ongoing utilities payments.

- 3) **Determination of Type, Amount, and Duration of Stabilization or Relocation Services**
 - a) Standard for determining how long assistance will be provided and whether to adjust assistance over time:

- i) Funds may be used to provide a program participant with up to 24 months of rental assistance during any three-year period.
 - ii) This assistance may be short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance.
 - iii) The determination of length of assistance, and any adjustments to the assistance over time, will be made as a result of each participant's individual needs.
 - iv) Evidence of this determination must be documented in each participant's case file resulting from ongoing case management and the development of an individualized financial assistance strategy.
 - v) Funds may be used to provide a program participant with up to 24 months of rental assistance during any three-year period.
- b) This assistance may be short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance.
 - c) Regardless of the type of assistance, the amount of assistance may not exceed \$2,000 per household within a three-year time frame.

4) **Re-Evaluation**

- a) ESG sub-recipients must re-evaluate program participant's eligibility and the types and amounts of assistance the participant needs;
 - i) Not less than once annually for participants who are receiving rapid re-housing assistance.
 - ii) At the sub-recipient's discretion, re-evaluations may be conducted more frequently than required and may also be incorporated into the case management process which must occur not less than monthly for homeless prevention and rapid rehousing participants.
 - iii) Regardless of which timeframe is used, re-evaluations, must at minimum, establish that:
 - (1) The program participant does not have an annual income that exceeds 30 percent of median family income for the area and the program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance.
 - (2) When the program participant's income or other circumstances change, such as change in household composition, that affects the program participant's need for assistance under ESG, the sub-recipient must then re-evaluate the program participant' eligibility and the amount and types of assistance the program participant needs.

5) **HMIS and Coordinated Entry participation**

- a) The ESG-RRP must be an HMIS participating program.
- b) The established Coordinated Entry Assessment (VISPDAT) must be used to determine if this intervention is the best suited for the client.

6) Coordination among emergency shelter, essential services, homelessness prevention and rapid rehousing, mainstream services, and housing providers.

- a) The ESG-RRP program will be publicized to COC members and other providers, stakeholders, and mainstream services through email, COC network meetings, and flyers. The materials will include program details, requirements, and restrictions.
- b) The sub-grantee will be responsible for coordinating with appropriate services for the benefit of program participants. Those services will include, but are not limited to, Veterans' programs, federally subsidized housing programs, mainstream resources (TANF, SNAP, SSI, etc.), Education for Homeless Children and Youth programs, health services, and others.
- c) Referrals will be made by existing emergency shelters, transitional housing programs, homelessness prevention programs, outreach teams and other stakeholders. Referrals include at a minimum and preliminary analysis for program eligibility.

7) Other Performance standards

- a) The overarching performance standards for the ESG-RRP Services are to: (1) reduce the number of people who are homeless in our community and (2) reduce the length of time the participants are homeless in our community.
- b) The specific ESG-RRP performance outcomes are as follows:
 - i) With the assistance of ESG-RRP funding, households will move out of homelessness and into permanent housing.
 - ii) Long-term housing stability. Grantees and sub-awardees shall complete follow-up analyses at three month and six month intervals to determine whether assisted households continue to reside in permanent housing.
- c) City of Tallahassee ESG RRH forms for documentation of habitability, lead-based paint, and rent reasonableness will be used.

8) Eligible expenditures

- a) ESG Rapid Rehousing funds may be used to pay for permanent housing only. Permanent housing is defined by HUD in the COC Interim Rule to mean community-based housing without a designated length of stay, and includes both permanent supportive housing and rapid rehousing. To be permanent housing, the program participant must be the tenant on a lease for a term of at least one year, which is renewable for terms that are a minimum of one month long, and is terminable only for cause.
- b) Financial assistance costs. ESG-RRP funds may be used to pay housing owners, utility companies, and other third parties for the following costs, up to \$2,000 per household, as appropriate based on a needs analysis.
 - i) Rental application fees. ESG-RRP funds may pay for the rental housing application fee that is charged by the owner to all applicants.

- ii) Security deposits. ESG-RRP funds may pay for a security deposit that is equal to no more than 2 months' rent.
 - iii) Last month's rent. If necessary to obtain housing for a program participant, the last month's rent may be paid from ESG-RRP 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.
 - iv) Rental assistance. Funds may be used to provide a program participant with up to 24 months of rental assistance during any three-year period. This assistance may be short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance.
 - (1) Short-term rental assistance is assistance for up to three months of rent.
 - (2) Medium-term rental assistance is assistance for more than three months but not more than 24 months of rent.
 - (3) Payment of rental arrears consists of a one-time payment for up to six months of rent in arrears, including any late fees on those arrears.
 - (4) Rental assistance may be tenant-based or project-based.
 - v) Utility deposits. ESG-RRP funds may pay for a standard utility deposit required by the utility company for all customers for the utilities listed in paragraph (v) of this section.
 - vi) Utility payments in arrears. ESG-RRP funds may pay for utility payments in arrears, within restrictions described below. This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company and/or proof of responsibility to make utility payments. Eligible utility services are gas, electric, water, and sewage.
- c) Services costs. Up to 25% of the ESG-RRP sub-grantee funding may be used to pay the costs of providing the following services:
- i) Housing search and placement. Services or activities necessary to assist program participants in locating and obtaining suitable permanent housing, which may include the following:
 - (1) Assessment of housing barriers, needs, and preferences;
 - (2) Development of an individualized financial assistance strategy,
 - (3) Development of an action plan for locating housing;
 - (4) Housing search;
 - (5) Outreach to and negotiation with owners;
 - (6) Assistance with submitting rental applications and understanding leases;
 - (7) Assessment of housing for compliance with Emergency Solutions Grant (ESG) requirements for habitability, lead-based paint, and rent reasonableness;
 - (8) Assistance with obtaining utilities and making moving arrangements; and
 - (9) Tenant counseling.

(10) Follow up to ensure housing stability

ii) Housing stability case management. ESG-RRP funds may be used to pay costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to assist a program participant in overcoming immediate barriers to obtaining housing. This assistance cannot exceed 30 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing.

Component services and activities consist of:

- (1) The BBCoC's coordinated assessment (VISPDAT) is required to be used to evaluate individuals and families applying for or receiving rapid rehousing assistance, that system will be used;
 - (2) Conducting the initial evaluation required under 5576.401(a), including verifying and documenting eligibility, for individuals and families applying for rapid rehousing assistance;
 - (3) Counseling to help ensure housing stability;
 - (4) Developing, securing, and coordinating services and obtaining federal, state, and local benefits;
 - (5) Monitoring and evaluating program participant progress;
 - (6) Providing information and referrals to other providers;
 - (7) Developing an individualized housing and service plan, including a household budget and planning a path to permanent housing stability; and
 - (8) Conducting re-evaluations required under 5576.401(b).
- d) HMIS costs. A maximum of 6% of the ESG-RRP sub-grantee funding must be used to pay the costs of HMIS, which includes a 3% participation fee paid to the lead HMIS agency (unless the recipient is the HMIS lead agency, in which case the 3% must be utilized to support the HMIS function, as described in 5576.107).
- i) Costs of HMIS participation are described in 5576.107.
 - ii) The remaining 3% of sub-grantee funding may support the sub-grantee's HMIS costs including licensing and reporting fees.

Homeless Prevention (HP) Program Component

- 1) **Evaluating eligibility for ESG-HP assistance** (standards for evaluating each individual's/family's eligibility for assistance):
 - a) Program participants must meet the definition of "at risk of homeless" as defined in 5576.2, or meet the criteria in (2), (3), or (4) of the "homeless" definition.
 - b) Program participants' households must have a source of verifiable income, which is expected to be sufficient to sustain housing at the completion ESG-HP assistance.
 - c) Participants' household income must be at or below 30% AMI (Area Median Income).
 - d) Participants must have consultation with ESG-HP staff for assessment, evaluation, eligibility determination, and housing stabilization services, as described below.

- 2) **Amount of rent or utilities costs paid by program participants**
 - a) Share of rent/utilities paid by the program participant (guideline for determining what, if any, share of rent/utilities will be paid by the participant while in the program).
 - i) The ESG-HP funding provides financial assistance related to the costs of obtaining permanent housing, up to a maximum of \$2,000 per household, based upon a needs analysis. Funding can be used to provide one-time assistance or ongoing assistance provided that the ongoing assistance does not exceed \$2,000 per household.
 - ii) The share of rent/utilities that each program participant must pay while in the program shall be determined as a result of each program participant's individual needs. Evidence of this determination must be documented in each participant's case file resulting from the development of an individualized financial assistance strategy.
 - iii) No financial assistance is provided for ongoing utilities payments.

- 3) **Determination of Type, Amount, and Duration of Stabilization or Relocation Services**
 - a) Standard for determining how long assistance will be provided and whether to adjust assistance over time:
 - i) For eligible participants, currently in permanent housing, funds may be used to secure other permanent housing.
 - ii) Funds may be used to provide a program participant with up to 24 months of rental assistance during any three-year period.
 - iii) This assistance may be short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance.
 - iv) The determination of length of assistance, and any adjustments to the assistance over time, will be made as a result of each participant's individual needs.
 - v) Evidence of this determination must be documented in each participant's case file resulting from ongoing case management and the development of an individualized financial assistance strategy.

- vi) Funds may be used to provide a program participant with up to 24 months of rental assistance during any three-year period.
- b) This assistance may be short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance.
- c) Regardless of the type of assistance, the amount of assistance may not exceed \$2,000 per household.

4) **Re-Evaluation**

- b) ESG sub-recipients must re-evaluate program participant's eligibility and the types and amounts of assistance the participant needs;
 - i) Not less than once every 3 months for participants who are receiving homelessness prevention assistance.
 - ii) At the sub-recipient's discretion, re-evaluations may be conducted more frequently than required and may also be incorporated into the case management process which must occur not less than monthly for homeless prevention and rapid rehousing participants.
 - iii) Regardless of which timeframe is used, re-evaluations, must at minimum, establish that:
 - (1) The program participant does not have an annual income that exceeds 30 percent of median family income for the area and the program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance.
 - (2) When the program participant's income or other circumstances change, such as change in household composition, that affects the program participant's need for assistance under ESG, the sub-recipient must then re-evaluate the program participant's eligibility and the amount and types of assistance the program participant needs.

5) **HMIS participation**

- a) The ESG-HP must be an HMIS participating program.

6) **Coordination among emergency shelter, essential services, homelessness prevention and rapid rehousing, mainstream services, and housing providers.**

- a) The ESG-HP program will be publicized to COC members and other providers, stakeholders, and mainstream services through email, COC network meetings, and flyers. The materials will include program details, requirements, and restrictions.
- b) The sub-grantee will be responsible for coordinating with appropriate services for the benefit of program participants. Those services will include, but are not limited to, Veterans' programs, federally subsidized housing programs, mainstream resources (TANF, SNAP, SSI, etc.), Education for Homeless Children and Youth programs, health services, and others.
- c) Referrals will be made by existing emergency shelters, transitional housing programs, homelessness prevention programs, and other stakeholders. Referrals include at a minimum and preliminary analysis for program eligibility.

7) Other Performance standards

- a) The overarching performance standard for the ESG-HP Services is to reduce the number of people who become homeless in our community.
- b) The specific ESG-HP performance outcomes are as follows:
 - i) With the assistance of ESG-HP funding, households will regain stability in their current permanent housing or move into other permanent housing.
 - ii) Long-term housing stability. Grantees and sub-awardees shall complete follow-up analyses at three month and six month intervals to determine whether assisted households continue to reside in permanent housing.
- c) City of Tallahassee ESG RRH forms for documentation of habitability, lead-based paint, and rent reasonableness will be used for the required ESG HP inspections.

8) Eligible expenditures

- a) ESG Homeless Prevention funds may be used to pay for permanent housing only. Permanent housing is defined by HUD in the COC Interim Rule to mean community based housing without a designated length of stay, and includes both permanent supportive housing and rapid rehousing. To be permanent housing, the program participant must be the tenant on a lease for a term of at least one year, which is renewable for terms that are a minimum of one month long, and is terminable only for cause.
- b) Financial assistance costs. ESG-HP funds may be used to pay housing owners, utility companies, and other third parties for the following costs, up to \$2,000 per household, as appropriate based on a needs analysis.
 - i) Rental application fees. ESG-HP funds may pay for the rental housing application fee that is charged by the owner to all applicants for participants moving from current permanent housing to other permanent housing.
 - ii) Security deposits. ESG-HP funds may pay for a security deposit that is equal to no more than 2 months' rent for participants moving from current permanent housing to other permanent housing.
 - iii) Last month's rent. If necessary to obtain other permanent housing for a program participant, the last month's rent may be paid from ESG-HP 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.
 - iv) Rental assistance. Funds may be used to provide a program participant with up to 24 months of rental assistance during any three-year period. This assistance may be short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance.
 - (1) Short-term rental assistance is assistance for up to three months of rent.
 - (2) Medium-term rental assistance is assistance for more than three months but not more than 24 months of rent.

- (3) Payment of rental arrears consists of a one-time payment for up to six months of rent in arrears, including any late fees on those arrears.
 - (4) Rental assistance may be tenant-based or project-based.
 - v) Utility deposits. ESG-HP funds may pay for a standard utility deposit required by the utility company for all customers for the utilities listed in paragraph (v) of this section.
 - vi) Utility payments in arrears. ESG-HP funds may pay for utility payments in arrears, within restrictions described below. This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company and/or proof of responsibility to make utility payments. Eligible utility services are gas, electric, water, and sewage.
- c) Services costs. Up to 25% of the ESG-HP sub-grantee funding may be used to pay the costs of providing the following services:
- i) Housing search and placement. Services or activities necessary to assist program participants in locating and obtaining suitable permanent housing, which may include the following:
 - (1) Assessment of housing barriers, needs, and preferences;
 - (2) Development of an individualized financial assistance strategy,
 - (3) Development of an action plan for locating housing;
 - (4) Housing search;
 - (5) Outreach to and negotiation with owners;
 - (6) Assistance with submitting rental applications and understanding leases;
 - (7) Assessment of housing for compliance with Emergency Solutions Grant (ESG) requirements for habitability, lead-based paint, and rent reasonableness;
 - (8) Assistance with obtaining utilities and making moving arrangements; and
 - (9) Tenant counseling.
 - ii) Housing stability case management. ESG-HP funds may be used to pay costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to assist a program participant in overcoming immediate barriers to obtaining housing. This assistance cannot exceed 30 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing.
- Component services and activities consist of:
- (1) The BBCoC's coordinated assessment (VISPDAT) is required to be used to evaluate individuals and families applying for or receiving homeless prevention, that system will be used;
 - (2) Conducting the initial evaluation required under 5576.401(a), including verifying and documenting eligibility, for individuals and families applying for homeless prevention assistance;
 - (3) Counseling to help ensure housing stability;
 - (4) Developing, securing, and coordinating services and obtaining federal, state, and local benefits;

- (5) Monitoring and evaluating program participant progress;
 - (6) Providing information and referrals to other providers;
 - (7) Developing an individualized housing and service plan, including a household budget and planning a path to permanent housing stability; and
 - (8) Conducting re-evaluations required under 5576.401(b).
- d) HMIS costs. A maximum of 6% of the ESG-HP sub-grantee funding must be used to pay the costs of HMIS, which includes a 3% participation fee paid to the lead HMIS agency (unless the recipient is the HMIS lead agency, in which case the 3% must be utilized to support the HMIS function, as described in 5576.107).
- i) Costs of HMIS participation are described in 5576.107.
 - ii) The remaining 3% of sub-grantee funding may support the sub-grantee's HMIS costs.

Street Outreach (SO) Component

- 1) To be eligible for services through ESG, clients must be classified as homeless under Category 1 and Category 4 of HUD's definition of homelessness, be between the ages of 16-21, and be located within our service area.

- 2) Eligible clients will be served where they are using a program model that brings services to the client. This may include homeless camps, wood, homeless shelters, the streets, or other youth hotspots. Youth may also receive Street Outreach services by visiting the program Drop In Center located in Tallahassee, Leon County. After an initial intake is completed with a homeless youth, advocates will provide youth with any basic care services, including food, clothing, shelter, or medical care if necessary. Youth under the age of 18 will have 24-hour access to emergency youth shelter and the Street Outreach Program (SOP) has a partner agreement with the local homeless shelter to provide 24-hour access to SOP clients over the age of 18. After meeting the youth's basic needs, advocates will complete a Trauma Symptoms Inventory Screening if applicable, and an assessment and plan of services will be completed, with youth input and participation. As feasible, family members will be included in the development and execution of this plan. Goals will include, but are not limited to the following: developing a safety plan (including what to do in a disaster situation), developing goals to further education or work experience, and creating a plan for safe exit from the streets into a safe, stable living situation, whether to shelter, a transitional program (i.e., CCYS TLC, Hope Community, Brehon Family Services — Maternity Home, etc.), or to a permanent, safe living situation at home or other location. Youth from out of the area will receive the same services. If a safe, stable living situation is located within the youth's family/hometown, advocates will aid in arranging transportation (i.e., HomeFree program through Greyhound, partner agencies which help with transportation). If no suitable situation is available in the youth's hometown, efforts will be made for suitable living accommodation within our area (group living, transitional living, etc.)

- 3) Advocates will manage client cases by weekly evaluation of client goals and development of the client. Follow up phone calls and/or meetings will be conducted once every three days, or on a schedule set by the client. Once a client has moved into stable housing, advocates will follow up with active clients once a week or once every two weeks depending upon the needs of the client. Advocates will maintain active case management for at least three months after the last known contact date, and will maintain active case management for as long as a client needs or is eligible for services. Advocates constantly evaluate the goals of the client and will make adjustments, with youth input and direction, to either slow or speed up progress and development of the youth.

- 4) A client is defined as a homeless youth, ages 16-21, that has agreed to accept services from Street Outreach Advocates.

- 5) Documentation will include the following: These Client Files will consist of the following screening and assessment tools: Initial Youth Contact Form (to establish initial needs of youth, collect trauma, health, and demographic data, establish contact methods); Trauma Symptoms Inventory Screening

(to assess prior trauma to assist with referrals for specialized care); Contact Sheet (to track services provided during each individual contact/meeting with the youth); Chronological Form (for advocates to keep notes on meetings and progress of youth interactions); and a Plan of Service Form (used to set goals and milestones for youth).

- 6) The ESG-SO program must be an HMIS participating program.

Case Management

- 1) ESG Case management is designed to stabilize a participant at risk of crisis and/or homelessness. Service length is determined by participant need. Meetings with participants may take place at an agreed upon locations. Case managers should take all reasonable steps to ensure access to services. Case managers may transport participants in accordance with agency policies.
- 2) The case manager will be the participants' point of contact with the program. In addition to assessing the needs of each participant, the case manager will be responsible for completing the BBCoC's coordinated assessment (VISPDAT). In addition to experience, an effective case manager should be familiar with the area of community in which the program operates and must actively cultivate a working knowledge of relevant area resources such as available affordable housing, community services, emergency services, emergency, mental and physical healthcare professionals, public benefits offices, employment training and placement programs, etc.
- 3) Intake: Once eligibility has been confirmed, the case manager will begin providing services by performing an assessment of the participant's needs. Case managers should gather as much information as possible about the participant's health, income, eligibility for public benefits, employment skills, background, family relationships and support, and living situation in order to identify and coordinate those services that will be most effective in improving the participant's housing stability. This information will also be required for HMIS.
- 4) Service Agreements: Prior to providing case management services, participants must enter into a case management agreement, sign a release of information and an HMIS consent. Case managers must be prepared to explain the purpose of each of the forms in order to encourage agreement and participation. Service staff will also provide participants with participant rights information or other intake information required by their agency/program.
- 5) Comprehensive Needs Assessment: Each participant will complete a needs assessment to help determine service needs.
- 6) Required outreach activities:
 - a) Cases should be staffed with a supervisor at a minimum of bi-weekly to ensure consistency and quality.
 - b) Service staff is required to assist participants to obtain, and coordinate the provision of, other public benefits that are being provided by Federal, State, local, or tribal agencies, or any eligible entity in the area or community by referring the participant to and coordinating with such entities.
 - c) Outreach will be completed at different locations throughout the service area.

7) Case Management Documentation:

- a) All case activity must be clearly documented in the participant Progress Notes. Supervisors should be able to read progress notes and have a clear picture of participant's circumstances, progress and service provision. Progress notes should begin at the time of screening and follow the participant until closure. Progress notes need to be completed in a timely manner—preferable the same day as service is provided, but within no more than 48 hours.
- b) Service staff is responsible for verifying and documenting the eligibility and documenting the eligibility of all families prior to providing assistance. They are also responsible for maintaining this documentation in the participant case file once approved for assistance. Insufficient case file documentation may be found out of compliance with program regulations. ESG allows various types of documentation, ranging from third party verification to participant self-declaration. Minimum acceptable types of documentation vary depending on the type of income or particular housing status and circumstances being documented. General documentation standards, in order of preference, are as follows:
 - i) Written Third Party - Verification in writing from a third party (e.g. individual employer, Social Security Administration, welfare office, emergency shelter, etc.) either directly to staff or via the family. Third party verification of income, such as a deposit slip showing SSI benefits, might show income after deductions have been made; staff must document gross income, pre-deductions. Written third party documentation may include completion of an ESG Verification of Income and Housing Status Form.
 - ii) Oral Third Party - Verification from a third party (e.g. individual employer, Social Security Administration, welfare office, etc.) provided by the third party over the telephone or in-person directly to ESG staff. Oral third party verification is acceptable only if written third party verification cannot be obtained. ESG staff must document reasons why third party written verification could not be obtained in the participant file. Please note this is different from participant self-declaration of income. If a family orally declares income, it would fall under "participant self-declarations" below.
 - iii) Participant Self-Declaration - an affidavit of income and housing status as reported by the household is allowable, but is only acceptable if written or verbal third party verification cannot be obtained. Self-declaration of housing status (e.g., eviction) should be rare. ESG staff must document reasons why third party written or oral verification could not be obtained in the participant file.

8) Forms related to case management:

- Case Management Agreement
- Release of Information
- Monthly Living Expenses Budget
- Progress Notes (HMIS)

Participant Rights and Grievance Procedures Required for BBCoC ESG Programs

- 1) Agencies must have a written grievance procedure for program participants.
- 2) Agencies must provide their written grievance procedure to program participants.
- 3) Agencies must make accommodations for participants who have language or disability barriers that would prevent them from participating in the grievance resolution process.
- 4) Consistent with ESG regulations, if a program participant who receives ESG assistance violates program requirements, the agency may terminate the assistance in accordance with a formal process established by the COC or the Agency. The process must protect the rights of the individuals affected.
- 5) The minimum process required for ESG homeless prevention and rapid rehousing programs must reflect the same enhanced process requirements contained in HUD's supportive housing program regulations due to the similarities between the services. Specifically, to terminate rental assistance or housing relocation and stabilization services to a program participant, the minimum required formal process must consist of a written notice to the program participant containing a clear statement of the reasons for termination, a review of the decision, and a prompt written notice of the final decision to the program participant.
- 6) The review of the decision must give the program participant the opportunity to present written or oral objections before a person designated by the agency other than the person (or a subordinate of that person) who made or approved the termination decision. The agency may resume assistance to a family or individual whose assistance has been terminated.
- 7) The Big Bend COC retains the right to require modification of any review or appeal process that the COC determines does not meet basic principles for notification, instruction, time allowance, impartiality or other necessary component.