

COOK COUNTY 2023 Emergency Solutions Grant (ESG) Program Funding Application Guide

Guide for successful preparation and submittal of the 2023 ESG Funding Application

This guide details ESG funding requirements including related documentation and processes.

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ESG PROGRAM HISTORY AND OVERVIEW

The Emergency Shelter Grant (ESG) has now been amended by the "Homeless Emergency Assistance and Rapid Transition to Housing" (HEARTH) Act of 2009 to become the **Emergency Solutions Grant** (ESG). The HEARTH Act amends and reauthorizes the McKinney-Vento Homeless Assistance Act of 1987. The primary changes include a greater emphasis on homelessness prevention, the addition of rapid re-housing, the regulatory requirements for Homeless Management Information System (HMIS) use, increased emphasis on performance, and a requirement for greater coordination and collaboration between the recipient and the Continuum of Care.

While the prior ESG (the Emergency Shelter Grants program under the McKinney-Vento Act) had a greater emphasis on homeless assistance, the HEARTH regulations limit the funding for homeless assistance and remove the limitations on funding for homeless prevention and rapid re-housing. Additionally, HMIS is now an eligible component for ESG funding.

In late 2011, HUD released the interim regulations for the new ESG, the updated definitions of homelessness and at risk of homelessness, and HMIS regulations. 2012 marked the first calendar year that the new ESG regulations fully took effect.

The regulations implementing the ESG Program are found at 24 CFR Part 576.



ELIGIBLE AREAS

Cook County currently receives ESG funds as an annual entitlement allocation on the basis of its qualification as an urban county. Cook County ESG funds may only be utilized within the limits of the current effective Cook County Urban County area excluding other entitlement communities also receiving ESG funding.

Proposed funding applications must serve suburban Cook County—either in its entirety or within a specified location. Please note that organizations solely serving other jurisdictions that receive direct ESG funding (see list below), or solely serving clients from these jurisdictions cannot be funded. Additionally, clients funded through Homelessness Prevention or Rapid Re-housing to move into or stay in apartments in these locations cannot be funded.

All jurisdictions in Cook County may be served by Cook County's ESG program in this funding year except for:

- Chicago
- Cicero
- Evanston
- Oak Park



ELIGIBLE COMPONENTS AND ACTIVITIES

A broad range of programs and activities are eligible for funding in five components as listed below. Each component includes several eligible activities. Applicants may apply for funding under one or multiple components. While applicants may inquire about the eligibility of any activities not listed, applicants may generally presume that any activity not listed is ineligible.

Non-profit agencies with a 501(c) 3 are eligible to apply for ESG funding; units of local government are not eligible for ESG funding.

- **Homeless Prevention:** Assistance and services to prevent households from becoming homeless. To qualify as being at risk, households must be under 30% area median income and must also meet the criteria in the "at risk of homelessness" definition in 24 CFR § 576.2. Any assistance a household receives must either be necessary to help the household regain stability in their current household or move elsewhere and achieve permanent stability there. Subrecipients must re-evaluate and re-certify program participants for Homeless Prevention eligibility no less than once every three months.
 - Financial Assistance—cannot exceed 24 months during any 3 year period.
 - Rental Application Fees
 - **Security Deposits**—equal to no more than 2 months' rent
 - **Last Month's Rent**—(if necessary) can be paid at time of security deposit and first month's rent.
 - **Utility Deposits** for standard utilities.
 - **Utility Payments** (A partial payment for a month counts as one month's payment.)
 - Up to 6 months in arrears for gas, electric, water, and sewage.
 - Up to 24 months of current payments for gas, electric, water, and sewage.
 - Moving costs—eligible costs include truck rental, moving company costs, temporary storage fees for up to three months from when client starts receiving assistance (not arrears) and until client moves into permanent housing.
 - Homeless Prevention Services—Staff salaries for assisting individuals and households with housing relocation and stabilization.
 - **Housing Search and Placement**—includes housing search and placement; assessment of housing barriers, needs, and preferences; locating housing for clients; outreach and negotiation with owners; assistance with rental applications; assessment of housing for ESG requirements for habitability, lead-based paint, and rent reasonableness;



assistance with moving and utility connection arrangements; and tenant counseling.

- **Housing Stability case management**—evaluating individuals and households receiving homeless prevention assistance; conducting initial intake and assessment; counseling; assisting individuals and households in securing mainstream services and financial benefits; developing an individualized housing plan; and conducting re-evaluations.
- **Mediation**—between program participant and property owner or person with whom client is living to keep participant from losing permanent their housing.
- **Legal Services**—legal services necessary to keep participant from losing permanent housing or to assist with issues that prohibit a program participant from obtaining permanent housing.
- **Credit Repair**—credit counseling or other services to assist program participant in household budgeting. **Does not include payment or modification of a debt.**
- Rental Assistance—except for rental arrears, this cannot be provided to individuals or households who are receiving other public rental subsidies. Assistance can be project based or tenant based. Rent cannot exceed Fair Market Rent. The subrecipient must have an agreement with the property owner and only make payments directly to the property owner. The program participant must have a legally binding lease with the property owner, other than in the case of rental assistance for rental arrears only. Other than for Rental Arrears, late fees are not an eligible cost.
 - **Rental Arrears**—a one-time payment of up 6 months in rental arrears, including late fees for arrears. The rent owed to the owner must be sufficiently documented in the owner's records.
 - **Tenant-based rental assistance:** The tenant chooses their own housing unit in which to live. The subrecipient can terminate assistance if tenant move out of the unit they lease, or if the tenant becomes ineligible for assistance.
 - **Short Term**—Up to three months of rental assistance.
 - Medium Term—Four to 12 months of rental assistance.
- **Rapid Re-housing**: Rapid Rehousing assistance can be used to help a homeless household move into permanent housing and achieve stability in that housing. Individuals and households must meet the homeless definition, as described in 24 CFR § 576.2, or must meet the criteria under paragraphs 1 or 4, generally be staying in a homeless shelter or other place not meant for human habitation.

The same eligible activities that apply to Homelessness Prevention apply to Rapid Re-housing, so long as the program participant meets the definition of being homeless.



Services are then Rapid Re-housing Services, instead of Homelessness Prevention Services. A household cannot be served with Rapid Re-housing and Homelessness Prevention funding simultaneously. A household must meet one definition or the other (homeless or at risk of homelessness).

HMIS: Cook County has required subrecipients to use HMIS (and for Domestic Violence services agencies to use a comparable data tracking program), and it is now required by HUD and also the first year it is an eligible component of ESG.

Costs Connected to HMIS lead agency

- **Costs of maintaining, upgrading, and warehousing data.**
- Conducting HMIS training, including travel costs.
- **Salaries for those operating HMIS:** Data entry, analysis, reporting, and training other staff to use HMIS.
- Travel and attendance costs for HMIS training.
- ***** Costs for Victims' Services Providers/Domestic Violence Agencies
 - **Costs of Comparable Tracking Database (for victims' services providers only):** Costs of establishing and operating database to track longitudinal data; data cannot be entered into HMIS.

Emergency Shelter

- **Essential Services:** Includes staff salaries and related costs as indicated below.
 - Case management
 - includes costs of coordinated intake and assessment system
 - Counseling services
 - Connecting clients with mainstream services
 - Developing plan and monitoring progress of participants
 - Child care costs for children under 13 (or for disabled children under 18)
 - Basic educational skills: consumer education, health education, substance abuse prevention, literacy, English as a foreign language, and GED classes (includes costs of books, other instructional materials, and referrals).
 - Employment assistance and job training: employment assistance and job training programs; books and instructional material specifically for job training; employment screening.
 - Life skills training: includes budgeting, parenting, conflict resolution, nutrition, using public transportation, and purchasing household supplies.
 - Transportation
 - Program participant's travel on public transportation
 - Mileage or gas costs or public transportation costs for staff to directly



serve participants

 Services to Special Needs Populations: Eligible costs include all of the above specifically for homeless youth, victim services (Domestic Violence shelters), and services for people with HIV/AIDS.

Shelter Operations: Includes costs of maintenance/repairs, rent, security, utilities, equipment, insurance, food, furnishings, and supplies necessary for the operation of the shelter, and hotel/motel vouchers, for use only when no emergency shelter spots are available.

Street Outreach

• **Engagement:** Eligible costs include **staff salaries** and **cell phone expenses** for workers who locate, identify, and build relationships with unsheltered persons to provide immediate support and connect them to emergency, community, and mainstream services.

Case Management: Staff salaries for assessing needs and delivering services for participants.

- Using centralized or coordinated intake and assessment system.
- Determining eligibility, delivering services, securing mainstream services, referring clients to other providers,
- Monitoring and evaluating client progress
- Developing individualized plans for permanent housing stability for clients.
- Transportation
 - Transportation costs (**mileage, gas, or public transportation costs**) by outreach workers, and other related workers, and transportation costs for Homeless Assistance providers to transport unsheltered persons to shelters or other emergency facilities.
 - \circ $\,$ Cost of program participant to take public transportation.

Services to Special Needs Populations: Eligible costs include all of the above specifically for homeless youth, victim services (Domestic Violence shelters), and services for people with HIV/AIDS.



MINIMUM AND MAXIMUM THRESHOLD REQUIREMENTS

Proposed projects must conform to the minimum and maximum thresholds indicated below in order to be eligible for funding.

<u>Minimums</u>

- Minimum application funded: \$25,000, can be spread across multiple activities and components.
- At minimum, the applicant must certify at least a dollar for dollar match for ESG. These matching funds must be available during the grant year itself.

<u>Maximums</u>

- Maximum application funded: \$125,000, can be spread across multiple activities and components.
- No more than 20% of the applicant's total budget (taken from the latest audit submitted) may be funded as an ESG grant. (For example, if an organization's operating budget was \$100,000, the highest ESG allocation they could get would be \$20,000.)
- No more than 50% of total award will be for staff salaries.
- Combined, the components of Street Outreach and Emergency Shelter will be capped at the greater of 60% of the total grant for the Program Year or the total amount obligated to Homeless Assistance from Program Year 2010 (\$337,464).
- No more than **6 (six)** total positions will be funded through staff salaries for ESG.
- The maximum rental assistance provided for a unit shall not exceed the HUD Fair Market rent, provided under 24 CFR 982.503, and it must comply with HUD's standard of rent reasonableness, as established under 24 CFR 982.507.
- For each household receiving rental assistance or any other financial assistance (utility assistance, for example), the maximum amount of assistance provided for Homelessness Prevention households shall not exceed \$3,000 and for Rapid Re-housing shall not exceed \$6,000. Applicants/subrecipients should strive to serve each Homelessness Prevention household with an average of \$1,500 and each Rapid Re-housing household with an average of \$3,000.



APPLICABLE ADMINISTRATIVE REQUIREMENTS

In addition to the overall ESG eligibility requirements specified throughout this guide, additional administrative requirements exist. Depending upon project type, requirements pertaining to the following items may apply:

- HMIS: ESG subrecipients (with the exception of victim services providers) must use HMIS to track program participant data, and victim services providers must use a comparable database program.
- Coordinated Entry: All ESG recipients must follow the policies and procedures set by the Continuum of Care for that project-type, including the coordinated entry system. Policies can be found at:

http://suburbancook.org/sites/default/files/ce/Entry Point Operations Manual 2 0190222.pdf

- Procurement: ESG funding recipients must follow applicable procurement rules when purchasing services, supplies, materials, or equipment. Contractors must be competitively procured.
- Lead-Based Paint: When federal funds including ESG are used to assist housing built before 1978, steps must be taken to address lead hazards.
- Fair Housing, Accessibility, and Equal Employment: To be in compliance, ESG funding recipients must adhere to all the basic tenets of fair housing, accessibility, and equal opportunity regulations and demonstrate fairness in the provision of ESG funded programs and projects. These requirements are intended to protect individuals from discrimination in housing and in employment, through business opportunities such as contracting, or through other benefits created by ESG projects.

**** Note:** This is not a comprehensive summary of all ESG administrative requirements. Applicants should consult the Resources included in the Appendix for additional information. Additionally, applicants are strongly encouraged to contact the Department to determine applicable administrative requirements **prior** to submission of an application. Department contacts may be found in the Appendix.



APPLICATION PREPARATION and SUBMITTAL GUIDANCE

Prospective funding applicants are encouraged to attend the Application Training Workshop as indicated in the Funding Cycle Timeline. This workshop will cover general ESG funding eligibility requirements as well as the funding application format and content.

In addition, prospective applicants should consult the Resources included in the Appendix for additional information. As additional requirements and restrictions have been instituted by Cook County beyond the HUD ESG rules, applicants are strongly encouraged to contact the Department to determine eligibility and applicable requirements **prior** to submission of an application. Contacts may be found in the Appendix.

<u>Submittal</u>

Applications must be submitted via the online application submission form. No paper copies or emailed applications will be accepted.

The application submission form for ESG projects can be found here: https://www.cookcountyil.gov/service/2023esg

Please complete all applicable sections of the fillable application PDF before submitting. Please make sure that the person who signed your application is the person authorized in your resolution. Application attachments are required and must be submitted as part of your application. The application PDF, all required attachments, and any other attachments an applicant wishes to include must be submitted through the online application submission forms.

Application documents and the submission form can be found here: <u>https://www.cookcountyil.gov/content/grant-applicants-cdbg-esg</u>

Applicants with questions regarding appropriate submittal should contact the Department **prior** to submission. Contacts may be found in the Appendix.



APPLICATION EVALUATION CRITERIA OVERVIEW

Applications are reviewed by Cook County staff to determine completeness, eligibility and consistency with Cook County's current Consolidated Plan. Given increasingly limited funds and increasing demands, only one (1) application for ESG funds per agency will be accepted for the 2023 Program Year. Applicants are strongly encouraged to assess their most pressing needs and submit an application accordingly.

Grants are reviewed and recommended by means of a competitive application evaluation process, in accordance with project specific criteria.

While a well-written application is no guarantee of funding, you should make every effort to make the application **complete and concise**. In addition to completeness and eligibility, the categories on the following page will be used to evaluate applications:



All Projects:

Mandatory Rating Criteria Requirements

<u>Application Supporting Documentation:</u> Application includes all required supporting documents. Applicants will lose 15 points for each required document that is missing.

<u>Project Eligibility:</u> Does the project meet all eligibility requirements for HUD and Cook County? (See 24 CFR 576 and Application Guide) (This criterion is all or nothing; if zero points, project cannot be considered.)

<u>Consistency with Consolidated Plan:</u> (This criterion is all or nothing. Project will either meet criterion or not; if zero points, project cannot be considered.)

<u>Involvement or Planned involvement with Continuum of Care and HMIS:</u> (*This criterion is all or nothing. Project will either meet criterion or not; if zero points, project cannot be considered.*)

Compliance with Entry Point (Coordinated Entry) Policies or planned compliance– Include information about the agency's participation in Coordinated Entry and compliance with Entry Point policies, including those related to training, accessibility and equal access. Note: A summary of coordinated entry expectations for each project type and the link to the policy and procedure manual is listed in the appendix.

Experience and Organizational Capability: The experience of the applicant - including the length of time in business and experience in undertaking programs/projects of similar complexity as the one for which funds are being requested - will be evaluated. In addition, the capability and skills of administrative and program staff to carry out the program are considered.

Standard Rating Criteria

Completion of Application—Points subtracted for areas of application not completed. (This does not include unanswered component questions.)

Performance History –(**Only applies to returning applicants**) Track record of turning in reports and on time, meet/exceed projected numbers, submission drawdowns quarterly, drawdown complete award amount

Participation in Continuum of Care and HMIS (or other database tracking system for Domestic Violence agencies)—points for checked boxes for yes, additional points for narrative mentions of involvement.

Number of beneficiaries to be served—Efficiency in ability to serve clients by type of service

Presence of Homeless or Formerly Homeless Involvement—(Involvement listed for minimal points; involvement detail for greater points; involvement in documented, meaningful policy-making way for greatest number of points.)

Housing First/Low Barrier Services – Projects are rewarded for providing low-barrier/low-threshold services or not screening out clients from a program (i.e. sobriety requirements, criminal background, treatment requirements, etc.). Note: refer to the "Housing First Checklist" in the appendix for more information.

Regional Collaboration—checked yes? more total points for detail.

Leverage—checked yes? additional points for detail; still greater points for higher match.

Demonstrated History—Include history relating to homeless programs, federal grants, and ESG in particular. Success metrics are beneficial as well.

Specificity of Descriptions—Completeness and clarity of narratives (Note that if there are inconsistencies within the application, the applicant cannot get the full points.)

Bonus Rating Criteria

Serves Area of Greater Need or Geared toward Special Subpopulation (Domestic Violence, Unaccompanied Youth (up to age 24), serves south suburbs exclusively, serves people who are chronically homeless)

Part of Broader Strategic Plan or Vision—yes checked and up to 1 additional point for detail.

Innovative Aspects— yes checked and up to 1 additional point for detail.

Focus on Rapid Rehousing—Whether the organization is doing something with Re-housing or whether Re-



housing is its focus.

Involvement in an Alliance Committee or team: The Alliance has several committees and teams working to implement the Alliance strategic plan to prevent and end homelessness including Built for Zero, Advocacy, Prevention/Diversion, Outreach, Youth, Coordinated Entry, and Plan.

FUNDING CYCLE TIMELINE

February 1, 2023	Application Webinar (see details below)
March 17, 2023(Due by 5pm)	Applications are due via upload through the online application submission forms (see page 10)
March 22 to May 2023	Application review period by Cook County Staff
June 2023 (Expected)	Economic Development Advisory Committee Public Hearing Approval of recommended 2023 projects
July 2023 (Expected)	Anticipated Cook County Board Meeting to approve projects

Application Webinar

We are also offering a webinar application workshop the morning of Wednesday, February 1, 2023

from 3pm-4pm.

We will share RSVP information for the webinar soon.

Note: The webinar is not mandatory.



APPENDIX

ESG Certification on Religious Activities (sign on 2023 ESG Application)

The applicant acknowledges and certifies that the proposed project will comply with the rules and regulations at 24 CFR § 5.109 Equal participation of faith-based organizations in HUD programs and activities. Specifically, the applicant agrees to the following:

1.) Applicant will adopt and follow procedures to ensure the ESG-funded program shall not discriminate against a beneficiary or prospective beneficiary on the basis of religion, religious belief, a refusal to hold a religious belief, or a refusal to attend or participate religious practice. Participation in any religious activity must be voluntary for the beneficiaries of ESG programs.

2.) The applicant will adopt and follow procedures to ensure explicitly religious activities, including activities that involve overt religious content such as worship, religious instruction, or proselytization, are offered separately, in time or location, from the programs or activities supported by ESG funds.

3.) If ESG funds will be used for acquisition, construction, or rehabilitation of structures, the applicant will only request ESG funds for the share of acquisition, construction, or rehabilitation attributable to ESG-eligible activities in accordance with generally accepted cost accounting requirements when a structure is used for both eligible and explicitly religious activities (including activities that involve overt religious content such as worship, religious instruction, or proselytization), ESG funds will not be used for the acquisition, construction, or rehabilitation of sanctuaries, chapels, or other rooms that are used as a principal place of worship.



PROHIBITED ACTIVITIES

The following activities may not be assisted with ESG funds:

- Legal 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.
- Targeting program participants only by ability to become self-sufficient.
- Providing assistance to persons who are employees, agents, consultants, officers, or elected or appointed officials of Cook County or the subrecipient agencies, except when the recipient has been granted an exception by HUD based on the individual household's case AND when the individual household meets all basic threshold requirements for being homeless or at risk of becoming homeless.
- While credit counseling *services* and other credit repair *services* are possible with ESG funds, subrecipients may not use ESG funds pay or modify a debt.
- Subrecipients may not discriminate against program participants or choose not to serve program participants on the basis of race, color, religion, age, sex, disability, national origin, ancestry, sexual orientation, or gender identity.
- No program participant shall receive more than 24 months of utility or rental assistance within any 3-year period.
- Payment of temporary storage fees under Housing Relocation and Stabilization Services.
- Housing stability case management 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.
- Rental assistance can only be provided if the rent does not exceed the Fair Market Rent established by HUD, as provided under 24 CFR part 888, and complies with HUD's standard of rent reasonableness, as established under 24 CFR 982.507.
- Payment of any late fees (excluding beneficiaries' rental or utility arrears).
- Rental or other financial assistance payments may not be made directly to clients.

Note: This is not a comprehensive summary of all ESG ineligible activities. Applicants should consult the Resources included in the Appendix for additional information. While



certain activities may be eligible under the HUD rules, Cook County reserves the right to further restrict project eligibility as deemed appropriate. As such, applicants are strongly encouraged to contact the Department to determine project eligibility and sources of documentation **prior** to submission of an application. Contacts may be found in the Appendix.

COORDINATED ENTRY PARTICIPATION EXPECTATIONS

All ESG projects are required to follow coordinated entry policies and procedures. For a detailed description of the policies and procedures, please visit;

http://suburbancook.org/sites/default/files/ce/Entry_Point_Operations_Manual_20190222.pdf.

Expectations for all project type include, but are not limited to:

- Attend all required coordinated entry trainings within the timeframe specified in the policy-manual
- Complete standard assessments for housing and other resources (i.e. VI-SPDAT)
- Participate in case-conferencing
- (Prevention/Rapid Re-Housing only) Accept all referrals using the coordinated entry system policies and protocol



RESOURCES

Prospective funding subrecipients are strongly encouraged to consult the resources indicated below for additional information regarding program and project requirements.

Cook County Current Consolidated Plan: Moving to Implementation - • County's 2020-2024 Consolidated Plan and CEDS)- https://www.cookcountyil.gov/sites/g/files/ywwepo161/files/cnt_cookcountyplan_6-30-20_1.pdf

ESG Program Overview and Regulations: https://www.hudexchange.info/programs/esg/

Introduction to the Emergency Solutions Grants (ESG) Program Webinar: <u>https://www.onecpd.info/resource/1929/introduction-to-the-emergency-solutions-grants-esg-program-webinar/</u>

Emergency Solutions Grants (ESG) Program Components and Activities Webinar: <u>https://www.onecpd.info/resource/1948/emergency-solutions-grants-program-components-and-activities-webinar/</u>

HEARTH "Homeless Definition Final Rule": https://www.onecpd.info/resource/1928/hearth-defining-homeless-final-rule/

Criteria and Recordkeeping Requirements for Definition of Homeless: <u>https://www.onecpd.info/resource/1974/criteria-and-recordkeeping-requirements-for-definition-of-homeless/</u>

Criteria for At Risk of Homelessness: <u>https://www.onecpd.info/resource/1975/criteria-for-definition-of-at-risk-of-homelessness/</u>

Coordinated Entry policies and procedures: https://suburbancook.org/wp-content/uploads/2019/02/Entry-Point-Operations-Manual.pdf

Housing First checklist:

https://www.usich.gov/resources/uploads/asset library/Housing First Checklist FINAL.pdf



KEY CONTACTS

Applicants are encouraged to contact staff with questions regarding funding eligibility, application preparation, and/or application submittal. Inquiries should be directed as noted below:

Primary Contact

Ericka Branch, Administrative AnalystPhone:(312) 603-1057Fax:(312) 603-9856Email:ericka.branch@cookcountyil.gov

Secondary Contact

Cheryl Cooke, Deputy DirectorPhone:(312) 603-1015Fax:(312) 603-9856Email:cheyrl.cooke@cookcountyil.gov