

**NEW HAMPSHIRE BALANCE OF STATE CONTINUUM OF CARE
CONTINUUM OF CARE PROGRAM and EMERGENCY SOLUTIONS GRANT**

WRITTEN STANDARDS

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Introduction

These standards are a reference for all Continuum of Care Program (CoC) and Emergency Solutions Grant (ESG) recipients and subrecipients regarding the established community-wide expectations. They clarify the NH BoS CoC's priorities and outline the current minimum standards for all CoC and ESG funded projects within the CoC's geography. All projects receiving CoC and ESG funding are required to abide by these written standards. The CoC strongly encourages projects that do not receive CoC or ESG funding to accept and utilize these standards.

These standards are to be reviewed regularly in order to ensure the system of providing assistance is transparent, ensure priorities are clear to all recipients, and as a CoC that limited resources are being used strategically.

All Project Types

1. Projects must have written policies and procedures and consistently apply them to all participants.
2. Projects must serve eligible participants and keep written documentation of eligibility criteria and decisions.
3. Community Partnership
 - a. Projects must coordinate with other targeted homeless services within the CoC.
 - b. Projects must coordinate with mainstream resources in the CoC including housing, social services, employment, education and youth programs for which participants may be eligible.
4. Educational Services for Children
 - a. Projects serving families with children must demonstrate that they are:
 - i. Establishing policies and practices that are consistent with the education subtitle of McKinney-Vento Act and other laws relating to education and related services to homeless people (e.g. Head Start, Individuals with Disabilities Education Act, Higher Education Act), including:
 1. Informing homeless families and youth of their eligibility for McKinney Vento education services during the intake process;
 2. Not requiring that children enroll in new schools as a condition of entry;
 3. Not establish program requirements that prohibit children from remaining in their school of origin; and
 4. Develop relationships with colleges to access Higher Education Services specifically for homeless youth (Higher Education Act).
 - b. Projects serving families with children must designate a staff person to ensure that children are enrolled in school and connected to services in the community including programs such as:
 - i. Head Start
 - ii. Part C of the Individuals with Disabilities Education Act and
 - iii. McKinney-Vento education services.The designated staff person should participate in service planning where there are extensive or significant unmet educational needs.
 5. Assistance with accessing Mainstream Benefits, including health insurance access

- a. Case managers shall systematically assist clients in completing applications for mainstream benefits.
 - b. Projects shall supply transportation assistance either directly or through referral to participants to attend mainstream benefit appointments, employment training, or jobs
 - c. Projects shall have staff systematically follow-up to ensure mainstream benefits are received by participants.
 - d. Projects are required to provide support and assist eligible participants to apply for healthcare options available through the Affordable Care Act and other funding sources.
6. Nondiscrimination Requirements
- a. CoCs, recipients and subrecipients must continue to comply with the nondiscrimination provisions of Federal civil rights laws, including, but not limited to, the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, and Titles II or III of the Americans with Disabilities Act, as applicable.
7. Coordinated Entry System (CES)
- a. All ESG and CoC projects must participate in the CoC's Coordinated Entry System (CES). All admissions will be originated by a referral from the CES. See Coordinated Entry policy and procedure manual for details.
8. Data and Reporting
- a. Projects must participate in the CoC's Homeless Management Information System (HMIS) or submit data from a comparable database if they are a designated domestic violence services provider.
 - b. Projects must submit an Annual Performance Report (APR) to the Department of Housing and Urban Development (HUD) and the CoC each year.
 - c. Projects must respond to requests from the HMIS Lead or CoC to improve data quality and support the annual submission of CoC Performance Measure results.
9. Project Recordkeeping Requirements for Recipients and Subrecipients (CoC Projects)
- a. Projects will follow applicable record keeping requirements in 24 CFR 578.103.
 - b. Homeless Documentation
 - i. Recipients must maintain and follow written intake procedures to ensure compliance with the definition of chronically homeless¹ and homeless² for their CoC project. These procedures establish the order of priority for obtaining evidence as:
 - 1. Third-party documentation;
 - 2. Intake worker observations; and
 - 3. Certification from the person seeking assistance.
 - 4. NOTE: Records contained in an HMIS or comparable database used by victim service or legal service providers are acceptable evidence of third-party documentation and intake worker observations if the HMIS retains an auditable history of all entries, including the person who entered the data, the date of entry, and the change made; and if the HMIS prevents overrides or changes of the dates entries are made.
 - c. Disability Documentation, if applicable to project eligibility, must be obtained from a qualified third party who is licensed by the state to diagnose and treat the condition being

¹ <https://www.hudexchange.info/resource/4847/hearth-defining-chronically-homeless-final-rule/>

² <https://www.hudexchange.info/resource/1928/hearth-defining-homeless-final-rule/>

documented. Intake staff-recorded observation of disability that within 45 days of the date of application for assistance is confirmed by a licenses professional as stated above. NOTE: Use of the option to document disability after program admission must be used cautiously due to possible financial impact if documentation is not obtained as expected.

d. Property Standards

- i. Housing Quality Standard (HQS) compliance documentation must be present for all CoC projects receiving leasing, rental assistance and operating assistance.
- ii. Habitability Standards compliance documentation must be present for all ESG rental assistance. (See [Appendix A](#) for standards)
- iii. Environmental Review³ compliance documentation must be present for all projects.
- iv. Lead Based Paint Visual Assessment for all residential properties built before 1978 where a child under the age of six or a pregnant woman is, or will be, living in the unit must be present.

Homeless Prevention Projects

ESG homeless prevention funds may be used to provide housing relocation and stabilization services and short-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the “homeless” definition in §576.2. This assistance may be provided to individuals and families who meet the criteria under the “at risk of homelessness” definition, or who meet the criteria in paragraph (2), (3), or (4) of the “homeless” definition in §576.2 and have an annual income below 30 percent of median family income for the area, as determined by HUD.

Eligibility Criteria

- See [Appendix C](#)

Minimum Standard of Assistance

10. Project staff must be familiar with and adhere to all project requirements of ESG as stated in Title 24 of the Code of Federal Regulations, Part 576⁴.
11. Project staff must provide assistance to participants to help avoid falling into homelessness.
12. Projects are required to have written policies and procedures regarding length of project enrollment and safeguards to meet the safety and shelter needs of special populations, e.g., victims of domestic violence/sexual assault; and families who have the highest barriers to housing and are likely to be homeless the longest.
13. Projects are required to have written policies and procedures regarding how participant’s needs for prevention services are determined and prioritized.
14. ESG funded projects are required to enter reporting data into NH HMIS and use NH HMIS to provide reports to the Department of Health and Human Services Bureau of Homeless and Housing Services. Programs may also be required to submit additional data that will be reported in HUD’s Integrated

³ <https://www.hudexchange.info/resource/4045/coc-program-environmental-review-flow-chart/>

⁴ <https://www.hudexchange.info/programs/esg/esg-law-regulations-and-notices/>

Disbursement and Information System (IDIS) and the Annual Performance Report to the NH Consolidated Plan (CAPER).

15. ESG grants are subject to federal cost principles, including 2 CFR Part 200 if it is a non-profit entity, educational institution, or hospital, and Public Law 102-550 if it is a state or local government entity. Federal grant funds may be used only for expenses clearly related and necessary to carry out the approved activities, including both direct costs that can be specifically identified with the project, and allowable and allocable indirect costs.

Emergency Shelter Projects

Essential services of emergency shelter may include but are not limited to: case management, education services, employment assistance and job training, outpatient health services, legal services, life skills training, child care, food, personal care items, mental health services, substance abuse treatment services, transportation, and services for special populations. These services may be provided directly or through referral to another agency.

Eligibility Criteria

- Participants must meet the applicable HUD definition of homelessness⁵

Currently, each individual shelter/program has its own eligibility criteria. At entry, this may be based on the sub-population served, i.e. – age, gender, family composition, severity of behavioral health issues, etc.

Minimum Standard of Assistance

16. Projects must provide shelter for participants.
17. Project staff must provide assistance to participants to transition to permanent housing.
18. Projects are required to have written policies and procedures regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations, e.g., victims of domestic violence/sexual assault; and families who have the highest barriers to housing and are likely to be homeless the longest.
19. Projects are required to have written policies and procedures regarding how residents' needs for essential services are determined and prioritized.
20. If the shelter provides services to families with children under 18, the age of the child may not be used as a basis for denying family's admission.
21. Termination of Shelter
 - a. Terminations may only occur for violations of program requirements, conditions of occupancy or being no longer eligible under the written guidelines for continued assistance.

Transitional Housing Projects

Transitional Housing (TH) is designed to provide homeless individuals and families with interim stability and support to successfully move to and maintain permanent housing.

⁵ Homeless definition standards can be found in the project rule, local RFPs, and NOFA documents as applicable.

Eligibility Criteria

- Participants must meet the applicable HUD definition of homelessness⁶

Minimum Standards of Assistance

22. Participant length of stay cannot exceed 24 months⁷.
23. Project staff must provide assistance to participants to transition to permanent housing.
24. Support services must be provided throughout the duration of stay in transitional housing.
25. Project participants in transitional housing must enter into a lease agreement for a term of at least one month. The lease must be automatically renewable upon expiration, except on prior notice by either party, up to a maximum term of 24 months⁸.
26. Termination of Housing
 - a. Terminations may only occur in the most severe cases after a project has examined all extenuating circumstances regarding violations.
 - b. The project staff will work closely with participant and other housing providers to assess other viable housing options.
27. All TH programs are encouraged to incorporate Housing First Principles whenever possible.

Rapid Re-Housing Projects

Rapid Re-Housing is available to help those who are literally homeless be quickly and permanently housed. Rapid Re-Housing Projects (RRH) provide housing relocation and stabilization services and short or medium term rental assistance as needed to help a homeless individual or family move as quickly as possible to permanent housing and achieve stability in that housing. Please note, Rapid Re-Housing funds are available through both CoC and ESG.

Eligibility Criteria (ESG)

- Participants must meet the applicable HUD definition of homelessness⁹
- Participants must have combined income below 30% Area Median Income (AMI)
- Participant lacks identifiable financial resources and/or support networks
- See [Appendix C](#) for additional criteria

Minimum Standards of Assistance (ESG)

28. Rental assistance may be provided for a maximum of 9 months in a 3 year period.

⁶ Homeless definition standards can be found in the project rule, local RFPs, and NOFA documents as applicable.

⁷ A homeless individual or family may remain in transitional housing for a period longer than 24 months, if permanent housing for the individual or family has not been located or if the individual or family requires additional time to prepare for independent living. However, HUD may discontinue assistance for a transitional housing project if more than half of the homeless individuals or families remain in that project longer than 24 months. (CoC Program Interim Rule, 578.79, <https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/>)

⁸ See previous footnote on extension of TH stays.

⁹ Homeless definition standards can be found in the project rule, local RFPs, and NOFA documents as applicable.

29. Maximum dollar amount of rental assistance per household is up to \$9,000 which includes any rental arrearages payments.
30. Payments of rental arrears can occur in a one-time payment for up to 3 months.
31. Housing Stability Case Management may not exceed 30 days during the housing search period.
32. Follow-up will occur at minimum monthly while participants are receiving assistance.
33. Follow-up will occur at six months after discharge if resources are available.
34. ESG funded projects are required to enter reporting data into NH HMIS and use NH HMIS to provide reports to the Department of Health and Human Services Bureau of Homeless and Housing Services. Programs may also be required to submit additional data that will be reported in HUD's Integrated Disbursement and Information System (IDIS) and the Annual Performance Report to the NH Consolidated Plan (CAPER).
35. ESG grants are subject to federal cost principles, including 2 CFR Part 200 if it is a non-profit entity, educational institution, or hospital, and Public Law 102-550 if it is a state or local government entity. Federal grant funds may be used only for expenses clearly related and necessary to carry out the approved activities, including both direct costs that can be specifically identified with the project, and allowable and allocable indirect costs.

Eligibility Criteria (CoC)

- Participants must meet the applicable HUD definition of homelessness.
- Participants lack identifiable financial resources and/or support networks

Minimum Standards of Assistance (CoC)

36. Admission priority will be provided to homeless families and individuals with the most urgent need.
37. Projects may provide a rental subsidy for up to 24 months.
38. Each project will establish a policy and procedure to determine the percentage or amount of rent each program participant must pay.
39. Each project will establish a policy regarding any limits in the amount of rental assistance a participant may receive.
40. Housing First Principles must be followed by all RRH projects.

Permanent Supportive Housing Projects

Permanent Supportive Housing (PSH) is permanent housing with indefinite leasing or rental assistance paired with supportive services to assist individuals experiencing homelessness who also have a disability or families with an adult or child member with a disability achieve housing stability.

Eligibility Criteria

- Participants must meet the applicable HUD definition of homelessness¹⁰
- PSH can only provide assistance to individuals with disabilities and families in which at least one adult or child has a disability.

¹⁰ Homeless definition standards can be found in the project rule, local RFPs, and NOFA documents as applicable.

Minimum Standards of Assistance

41. No Designated Length of Stay - Program participants will be provided housing without a designated length of stay that permits them to live as independently as possible.
42. Lease Agreement - The program participant must be the tenant on a lease for a term of at least one year that is renewable and is terminable only for cause. The lease must be renewable for terms that are a minimum of one month long.
43. Supportive Services
 - a. Supportive services will be designed to meet the needs of program participants and must be made available to the program participants.
 - b. Supportive services to enable program participants to live as independently as possible must be provided throughout the duration of their time in the project.
 - c. Supportive service participation will not be required as a condition to maintain housing.
 - d. Projects will conduct an annual review of individual participants' service need and offer additional services if necessary.
 - e. Projects will conduct an annual review of the service needs of the project and should adjust services accordingly¹¹. Unmet needs identified and brought to the local and Balance of State CoC meeting for discussion.
44. Housing Units
 - a. Two individuals in a shared housing situation will have their own lease and their own bedroom unless the two individuals are presented together as a household.
45. Termination of Housing
 - a. Terminations may only occur in the most severe cases after a project has examined all extenuating circumstances regarding violations.
 - b. Termination of occupancy of housing may only occur in cases of noncompliance with the lease or failure of tenant to carry out obligations under landlord and tenant law.
 - c. Legal court eviction proceedings will be used in order to terminate tenancy from a housing unit.
 - d. Participants may not be terminated involuntarily from housing for refusal to participate in services or for violating program rules that are not related to lease compliance.
 - e. Provider will work closely with participant and other housing providers to assess other viable housing options if termination is unavoidable.
46. Housing First Principles will be incorporated into all PSH program by **2017**.
 - a. Housing First is a programmatic and systems approach that centers on providing people experiencing homelessness with housing quickly and then providing services as needed.
 - b. Separation of Housing and Treatment: Housing is not contingent on compliance with services – participants are expected to comply with a standard lease agreement and are provided with services and supports to help maintain housing and prevent eviction.
 - c. Participants have choice from available housing options in an integrated community setting.

¹¹ CoC Program Interim Rule, 578.53 (a) (2) <https://www.hudexchange.info/resource/2033/hearth-coc-program-interim-rule/>

Prioritization of Housing Resources

These standards establish the community-wide expectations of how resources are to be targeted with the community separate from meeting eligibility requirements, and specific to prioritizing assistance according to highest needs and greatest barriers towards obtaining and maintaining housing on their own. The NH BOS CoC has adopted HUD Notice CPD-16-11: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing¹². Standards for compliance with the notice are listed below in PSH Availability section.

Minimum Standards of Assistance

47. Recipients and subrecipients must exercise due diligence when conducting outreach and assessment to ensure that persons are prioritized for assistance based on the project specific criteria contained in these standards.
48. Documentation standards for showing outreach due diligence include:
 - a. Written project intake procedures showing the adoption of the written standards.
 - b. Documentation of the process and results used to determine the severity of service needs.
 - c. Documentation of the determination that no higher prioritized population members were present or willing to accept the project bed including:
 - i. Written evidence of outreach efforts to locate eligible persons
 - ii. Specific numbers of eligible participants that refused assistance
 - iii. Attempts to engage person who refused assistance.
49. PSH Availability for Dedicated or Prioritized Beds
 - a. Turnover beds in PSH projects will be prioritized for persons experiencing chronic homelessness based on the length of time they have resided in a place not meant for human habitation, a safe haven, or an emergency shelter and the severity of the service needs as determined by a standardized tool.
50. PSH Availability for Non-Dedicated or Non-Prioritized Beds
 - a. Priority 1 – Persons with a disability and who resided in a place not meant for human habitation, a safe haven, or an emergency shelter with fewer than 4 episodes that cumulatively total at least 12 months (i.e. not chronically homeless) and has been identified as having severe service needs.
 - b. Priority 2 – Persons with a disability who resided in a place not meant for human habitation, a safe haven, or an emergency shelter that **have** been identified as having severe service needs and are not Priority 1 households.
 - c. Priority 3 - Persons with a disability who resided in a place not meant for human habitation, a safe haven, or an emergency shelter that **have not** been identified as having severe service needs.
 - d. Priority 4 - Persons with a disability who resided in transitional housing including persons fleeing or attempting to flee domestic violence.
51. RRH Bed Availability – to be developed
52. TH Bed Availability – to be developed

¹² <https://www.hudexchange.info/resource/5108/notice-cpd-16-11-prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh/>

53. ES Bed Availability – to be developed

Appendices

Appendix A: Habitability Standards (ESG Projects Only)

The habitability standards that must be followed are outlined below:

- a. State and local requirements. Each provider must ensure that housing occupied by a household receiving ESG assistance is in compliance with all applicable state and local housing codes, licensing requirements, and any other requirements in the jurisdiction in which the housing is located regarding the condition of the structure and the operation of the housing or services.
- b. Unless less stringent variations are approved by HUD, housing occupied by the household receiving ESG funding must meet the following minimum requirements:
 1. Structure and Materials. Structures must be structurally sound so as not to pose any threat to the health and safety of the occupants and so as to protect the residents from the elements.
 2. Access. Housing must be accessible and capable of being utilized without unauthorized use of other private properties. Structures must provide alternate means of egress in case of fire.
 3. Space and Security. Each household must be afforded adequate space and security for themselves and their belongings. Each resident must be provided an acceptable place to sleep.
 4. Interior Air Quality. Every room or space must be provided with natural or mechanical ventilation. Structures must be free of pollutants in the air at levels that threaten the health of residents.
 5. Water Supply. The water supply must be free from contamination.
 6. Sanitary Facilities. Residents must have access to sufficient sanitary facilities that are in proper operating condition, may be used in privacy, and are adequate for personal cleanliness and the disposal of human waste.
 7. Thermal Environment. The housing must have adequate heating and/or cooling facilities in proper operating condition.
 8. Illumination and Electricity. The housing must have adequate natural or artificial illumination to permit normal indoor activities and to support the health and safety of residents. Sufficient electrical sources must be provided to permit use of essential electrical appliances while assuring safety from fire.
 9. Food Preparation and Refuse Disposal. All food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a sanitary manner.
 10. Sanitary Condition. The housing and any equipment must be maintained in sanitary condition.
 11. Fire Safety.
 - (i) 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 hearing-impaired persons occupy the unit, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired person.
 - (ii) 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.
- c. Lead-based paint remediation and disclosure. The Lead-Based Paint Poisoning Prevention and Disclosure 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 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.

Appendix B: HUD Program Guidelines for Assessing Cultural Competence

The following guidelines are used in assessing ESG programs' cultural competence.

Experience or track record of involvement with the target population – The applicant organization should have a documented history of positive programmatic involvement with the population/community to be served; e.g., a history of involvement with the target population or community.

Training and staffing – The staff of the organization should have training in gender/age/cultural competence. Attention should be placed on staffing the initiative with people who are familiar with, or who are themselves members of, the population/community.

Language – If an organization is providing services to a multi-linguistic population, there should be multi-linguistic resources, including use of skilled bilingual and bicultural individuals whenever a significant percentage of the target population/community is more comfortable with a language other than English.

Materials – It should be demonstrated that material and products such as audio-visual materials, PSA's, training guides and print materials to be used in the project are gender/age/culturally appropriate or will be made consistent with the population/community to be served.

Evaluation – Program evaluation methods and instrument(s) should be appropriate to the population/community being served. There should be rationale for the use of the evaluation instrument(s) that are chosen, and the rationale should include a discussion of the validity of the instrument(s) in terms of the gender/age/culture of the group(s) targeted. The evaluators should be sensitized to the culture and familiar with the gender/age/culture whenever possible and practical.

Community representation – The population/community targeted to receive services should be a planned participant in all phases of program design. There should be an established mechanism to provide members, reflective of the target group to be served, with opportunities to influence and help shape the project's proposed activities and interventions. A community advisory council or board of directors of the organizations (with legitimate and working agreements) with decision-making authority should be established to affect the course and direction of the proposed project. Members of the targeted group should be represented on the council/board.

Implementation – There should be objective evidence/indicators in the application that the applicant organization understands the cultural aspects of the community that will contribute to the program's success and which will avoid pitfalls.

Appendix C: ESG Eligible Participants and Activities

The HUD funded ESG Rapid Re-Housing and Housing Relocation and Stabilization Services Program is intended to serve New Hampshire households that are homeless and/or at risk of becoming homeless to include individuals, families and veterans.

Housing Relocation and Stabilization Services will consist of: Housing Search and Placement Services; Financial Assistance such as rental application fees, last month's rent, utility deposits, utility payments, and/or moving costs; Housing Search and Placement Services; and Housing Stability Case Management. Housing relocation services will be provided for approximately one month to assist the household to identify and obtain suitable housing. Housing stability and case management services will be provided for the period financial assistance is provided, and for up to six months after financial assistance has concluded.

Eligible Households

Individuals and families must meet the following criteria:

- Must have an initial consultation with a case manager or other assessment professional and providing information for federal reporting requirements;
- Must sign a written agreement for program participation which includes striving toward achieving housing stability and sustainability through program participation and engaging in activities that promote self sufficiency;
- Must continue to work with a housing stability case manager for six months after financial assistance ends; and
- Meet specific criteria for eligibility outlined in 24 CFR part 576 Homeless Emergency Assistance and Rapid Transition to Housing: Emergency Solutions Grants Program and Consolidated Plan Conforming Amendment; in particular, 576.2, definitions of "At Risk of Homelessness" and "Homeless". These criteria are also outlined in the attached recordkeeping checklist, which must be included in each client file.

Eligible Activities

ESG funds may be used to provide housing relocation and stabilization services and medium-term (nine-months) rental assistance necessary to: prevent an individual or family from moving into an emergency shelter and achieve stability in their housing; or to assist a homeless individual or family that is homeless move as quickly as possible from a homeless shelter into permanent housing and achieve stability in that housing. No more than 40% of the program budget may be utilized for prevention services/financial assistance.

Within each Rapid Re-Housing or Prevention project component, the categories of assistance are Housing Relocation and Stabilization Services and Rental Assistance, which have specific allowable activities.

Housing Relocation and Stabilization Services

Financial Assistance:

ESG funds may be used to pay housing owners, utility companies, and other third parties for the following costs:

- Rental application fees;
- Security deposits;
- Last month's rent;
- Utility deposits;
- Utility payments; and
- Moving cost assistance.

Services:

Housing Search and Placement

Services or activities necessary to assist program participants in locating, obtaining and retaining suitable permanent housing, which may include the following:

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

Housing Stability Case Management

ESG funds may be used to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing. This assistance may not exceed 30 days during which the program participant is searching for housing, and cannot exceed 15 months during the period the participant is living in permanent housing. Eligible activities under this component include:

- Use of a coordinated assessment system to evaluate households for eligibility;
- Conducting the initial evaluation including verifying and documenting eligibility;
- Counseling;
- Developing, coordinating and securing services and obtaining benefits;
- Monitoring and evaluating program participants progress;
- Providing information and referrals to other providers;
- Developing an individualized service and housing plan including a plan for achieving housing stability; and
- Conducting participant evaluations and reevaluations.

Additional eligible activities include mediation, legal services, and credit repair that is necessary to either prevent the program participant from losing their housing, or is necessary to allow the participant to access permanent housing.