

City of Evanston
Emergency Solutions Grant Program (ESG)
Policies and Procedures Manual

I. Overview

The Emergency Shelter Grant program provided funding for a broad range of activities that addressed the needs of people who are homeless or at risk of homelessness. ESG was one of 20 programs established by the Stewart B. McKinney Vento Homeless Act of 1987 (P.L. 100-77), the Nation's first comprehensive response to homelessness. The City of Evanston has received ESG funds since 1989.

In 2009, Congress approved the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act to better coordinate resources and address the growing problem of homelessness. The implementation of HEARTH includes changing the Emergency Shelter Grant to the Emergency Solutions Grant to include eligible activities based on the ARRA-funded Homelessness Prevention and Rapid Re-housing Program (HPRP).

The Emergency Solutions Grant Interim Rule regulations which took effect in 2012 direct entitlement communities to use funding for primarily re-housing and homeless prevention activities, following the “housing first” strategy of the HEARTH Act. The name change from the Emergency Shelter to the Emergency *Solutions* Grant highlights the focus on permanent housing rather than short-term shelters. Re-housing for people who are homeless is strongly prioritized. To facilitate a smooth transition from a shelter-based system to a housing first model, ESG continues to allow activities from the “old” ESG program, including: conversion, renovation, and rehabilitation of homeless shelter facilities; operational costs for those shelters; and street outreach services. Funding for these activities is capped at 60% of an entitlement community’s allocation or the amount of funding used for these activities in the 2010 fiscal year, whichever is greater. Under the current ESG regulations, funds may be used for the Homeless Management and Information System (HMIS), use of which is now required for all ESG-funded services by all service providers (excluding domestic violence shelters) to ensure consistency of data points and reduce duplication of services among providers.

Evanston receives ESG funds based on the needs of its residents and its goal is to provide housing and services in Evanston to the greatest extent possible. At present, all shelters and essential services funded with ESG are located in Evanston. Prevention funds are limited to eligible households living in Evanston. In order to be eligible for Re-housing funding, an individual or household’s last permanent address must be in Evanston or they are residing in a homeless shelter in Evanston. Due to the shortage of affordable housing in Evanston, particularly larger units, a household eligible for Re-housing may choose rental housing located outside of Evanston’s boundaries if no appropriate rental housing is identified in Evanston.

However, clients must continue to meet with their case manager and fulfill requirements of their case plan for the period in which rental assistance is provided.

The subrecipients receiving ESG funds are shown by each category below, with a brief listing of eligible expenses by category. Connections for the Homeless is the primary subrecipient for Rapid Re-housing and Prevention.

Homeless Management Information System (HMIS)

Connections for the Homeless

Funds may be used for staff salaries and benefits for HMIS management, HMIS licenses and computer security assessments.

Emergency Shelter Operational Costs

- Connections for the Homeless – Hilda’s Place
- YWCA Evanston-North Shore – Domestic Violence Shelter

Funds may be used for shelter maintenance, operation, rent, repairs, security, fuel, equipment, insurance, utilities, food, furnishings and costs of staff.

Street Outreach (formerly Essential Services)

Connections for the Homeless – Entry Point

Funds may be used for services relating to employment, health, drug abuse, and education and may include (but are not limited to):

1. Assistance in obtaining permanent housing
2. Medical and psychological counseling and supervision
3. Employment counseling, job placement and job training
4. Nutritional counseling
5. Substance abuse treatment and counseling
6. Assistance in obtaining other Federal, State and local benefits such as mental health benefits; employment counseling; medical assistance; Veteran's benefits; SSI/SSDI, TANF, General Assistance, LINK/SNAP; etc.
7. Other services such as child care and transportation
8. Salaries of program staff to provide the above services

Rapid Re-housing

Connections for the Homeless

Funds may be used for Direct Tenant Based Rental and Utilities Assistance, Housing Relocation and Stabilization Services, and case management.

Homeless Prevention

Connections for the Homeless

Funds may be used for Direct Tenant Based Rental and Utilities Assistance, Housing Relocation and Stabilization Services, and case management.

II. Eligibility Criteria for Prevention and Re-housing Funds

The City of Evanston's ESG program policies and procedures are based on its HPRP policies and procedures, modified to include the new HUD homeless definition and the regulations in the ESG Interim Rule as outlined below.

Cases will be reviewed and approved for the program by the ESG Program Review Committee, as with HPRP.

To receive **Rapid Re-Housing assistance**:

- A. Household must be homeless as defined under categories 1 or 4 of the homeless definition (see attached)
- B. Head(s) of household must be a U.S. citizen or legal resident whose last permanent residence prior to becoming homeless was an Evanston address at which they resided for six or more months (exception may be made to this requirement for households fleeing domestic violence)
- C. The household must have undergone at least an initial consultation and eligibility assessment with a case manager or other authorized representative who is responsible for determining eligibility and the type and level of assistance needed
- D. Based on assessment at intake, household has likelihood of maintaining housing and becoming self-sustaining following the receipt of short- or medium-term assistance, estimated at 3 – 6 months
- E. Head(s) of household must agree to follow the case management plan developed working with the case manager
- F. Head(s) of household must agree to meet with the designated case manager at least once a month while receiving assistance, including at least one home visit
- G. Head(s) of household must agree to follow-up contact at specified intervals following receipt of assistance. The City is working with the Alliance and ESG subrecipients to determine the most effective timing of follow-up contacts.

To receive **Prevention assistance**:

- A. Household must be at risk of becoming homeless under category 2 and 3 of the homeless definition or categories 1, 2, or 3 of the at risk of homelessness definition (see attached)
- B. Households must have an income below 30% of the Area Median Income (AMI) at initial assessment
- C. Head(s) of household must be a U.S. citizen or legal resident and an Evanston resident.

- D. The household must have undergone at least an initial consultation and eligibility assessment with a case manager or other authorized representative who is responsible for determining eligibility and the type and level of assistance needed
- E. Based on assessment at intake, household has likelihood of maintaining housing and becoming self-sustaining following the receipt of medium-term assistance
- F. Household income must be reassessed at 3-month intervals and remain under 30% of AMI to continue to receive Prevention assistance
- G. Head(s) of household must agree to follow the case management plan developed working with the case manager
- H. Head(s) of household must agree to meet with the designated case manager at least once a month while receiving assistance, including at least one home visit
- I. Head(s) of household must agree to follow-up contact at specified intervals following receipt of assistance. The City is working with the Alliance and ESG subrecipients to determine the most effective timing of follow-up contacts.

III. Standards for targeting and providing essential services related to street outreach

Connections for the Homeless' Entry Point program is the primary subrecipient for Street Outreach funding.

Admission

- Open to any homeless individual over the age of 17.
- Must be able to function in a congregate setting.
- Cannot be disruptive.
- Entry Point operating hours are M-Th 8am-12pm

There are two ways a client can access services at Entry Point. The primary method is through an intake appointment on set up for either Monday or Wednesday afternoons. The secondary method is through direct referral from an outside agency, where an intake would be scheduled based on the availability of a case manager. All clients who complete an intake are immediately eligible for drop-in services.

Referral

Clients are given referrals to mainstream services based on needs. Common referral services case management services below.

Case Management

Case managers will assist clients with:

1. Obtaining ID
2. Applying for benefits, GA, SSI, SSDI, veterans benefits, SNAP, Section 8 housing vouchers, VASH vouchers
3. Locating housing
4. Applying for housing assistance: IDHS Prevention funds and City of Evanston ESG
5. Applying for Medicaid

6. Creating an individual service plan with goals and implementation steps and timeframes

Health Care Team provides:

1. Physical
2. Vaccinations
3. Psycho-social assessment
4. Psychiatric evaluation and prescription of medication
5. Monitoring medication
6. Health education
7. Establishing a primary health care provider and physician.
8. Creating a coordinated care plan.

Employment Team provides:

1. One-on-one counseling
2. Weekly job club
3. Assistance with resumes
4. 4-day job readiness training program
5. Job referrals

Education Team provides:

1. TABE (Test of Adult Basic Education) testing
2. Career counseling
3. Remedial education/GED
4. Assistance in applying for training programs or education programs
5. Tutoring
6. Tuition assistance

Discharge

Entry Point uses a harm reduction and trauma-informed model for services. The philosophy of *harm reduction* promotes and supports the right of people who use substances and engage in other risky behaviors to be treated with dignity and respect, including their right to exercise self-determination related to use and their right to expect and receive collaboration in therapeutic relationships. *Trauma-Informed Systems* are those in which all components of a given service system have been reconsidered and evaluated in light of a basic understanding of the role that violence plays in the lives of people seeking mental health and addictions services.

Entry point uses a Behavior matrix that helps to guide staff to develop consequences for clients whose behaviors are disruptive in nature. These punitive measures are progressive. An indefinite ban can be implemented in the case of intensive violent behavior that is a danger to the client or others.

IV. Emergency Shelter: Admission, Diversion, Referral, and Discharge Policies

The City of Evanston has two overnight shelters: Hilda's Place, Connections for the Homeless' 20-bed transitional shelter, and the YWCA Evanston-North Shore's 34-bed domestic violence shelter. Both are supported by the City with ESG and Mental Health Board funds. Each provides shelter for up to 90 days. Hilda's Place serves an estimated 120 single adults and the YWCA provides shelter for an estimated 250 women and children who are victims of domestic violence each year.

Hilda's Place Admission, Diversion, Referral and Discharge Policies:

Admission

Open to any homeless individual over the age of 17.

- Must be able to function in a congregate setting.
- Cannot be disruptive.

Individuals seeking admittance go through an intake process that requires an interview with case managers. Intake takes place on Tuesday and Wednesday afternoon. Case managers review the application at the Thursday "staffing" meeting. Approved clients may move in the next day, or as scheduled based on availability.

Diversion & Referral

Clients who are turned away from the shelter are referred to the nearest shelter and provided with transit/bus fare to get there.

Discharge

Clients may be discharged for three reasons.

1. They have stayed 90 nights at Hilda's Place.
2. They have completed their case plan, found housing, and moved out.
3. They can be discharged for cause, which includes:
 - a. Violent behavior that is a danger to others or to themselves;
 - b. Persistent no shows for their shelter bed without an acceptable explanation;
 - c. Persistent violation of the curfew causing a disturbance in the shelter.

YWCA Evanston-North Shore Domestic Violence Shelter Admission, Diversion, Referral and Discharge Policies:

Admission

Admissions are done over the 24-hour crisis hot line.

- Client must be a victim of domestic violence

Diversion & Referral

Clients who are turned away from the shelter because it is full are referred to the Illinois Help Line (877-863-6338). Clients that call the YWCA hotline and are suicidal are referred to the nearest hospital for assessment before intake can proceed. Male children over the age of 12 cannot stay at the shelter. If a family with a male child 12 or older would like to stay together,

the household will be referred to Greenhouse or Family Rescue, which accepts families with male children up to 17 years.

Discharge

Clients can be discharged for the following reasons.

1. Violence
2. Safety Violations
3. Drug or Alcohol use
4. Repeated failure to follow the rules

In all cases, clients are assisted in finding an alternative shelter and given bus, train or cab fare to travel.

V. Coordination

The City of Evanston will continue to work with the Alliance to End Homelessness in Suburban Cook County (“The Alliance”), local agencies that serve the homeless and people at risk of homelessness and other advocacy organizations to develop and maintain policies and procedures to coordinate provision of emergency shelter, street outreach, homeless prevention and rapid re-housing assistance, mainstream and other services and housing providers. Connections, the primary recipient of City of Evanston ESG funds participates very closely with the Alliance on many levels. Connections is a member of the Alliance and participates in the north CBSA and AHAND committees. Connections staff participate on the HMIS Committee meeting, the monthly prevention meeting and the 150 HOME subcommittee meetings. The City’s Housing and Grants Administrator is currently an Alliance Board member. Participation across the Board and committees help to ensure clear communication of goals and priorities and decrease redundancies as they relate to ESG funding.

Coordination among ESG recipients is facilitated through the use of the Universal Intake and Eligibility Form developed by the Alliance whose use was implemented in February 2013 and updated in April 2014. This is an important first step in developing a more coordinated process for intake and will help determine targeting and prioritization for services. In the Alliance’s Draft Strategic Plan Action Steps 2014-2017, the goal to launch the use of a standardized assessment tool in suburban Cook County is clearly stated. The first step within that goal, to create a coordinated assessment subcommittee comprised of a wide range of experts, will occur in the first quarter of 2015. The Alliance and the 150 Homes Team are also evaluating the use of the VI-SPDAT (Vulnerability Index-Service Prioritization Decision Assistance Tool) as an evidence-based tool for determining acuity and matching homeless people to the interventions that fit their needs. The Alliance HMIS staff are reviewing the VI-SPDAT functionality that Bowman has built into its ServicePoint HMIS product. Hines VA Hospital is piloting the VI-SPDAT tool internally and using it to make decisions about HUD-VASH voucher prioritization allowing the Alliance to learn more about their experience with the tool.

VI. Prioritization

The City recognizes that the demand is greater than available resources to provide essential services, emergency shelter, prevention and re-housing that meet all needs. The City and Alliance also recognize that individuals and households must be prioritized to ensure that these limited resources available are allocated in the most efficient and appropriate manner. As stated above, the City of Evanston and the Alliance are continue to work on policies and procedures to assess, prioritize and reassess individuals and families' needs for all ESG-funded services, including essential services for those in emergency shelter, rapid re-housing and homeless prevention activities.

ESG providers and the City of Evanston staff and the Alliance are developing assessment tools and protocols for use by all agencies receiving ESG, CoC and other homeless program funding within the Continuum. These tools and protocols will create consistency in assessment and provide the basis for appropriate agency referrals and for targeting and prioritization by program. When complete, all ESG subrecipients will use this system to help determine the individual or family need for emergency shelter or other ESG-funded assistance.

Street outreach and emergency shelter are intended to be low-barrier, and the prioritization work will focus on getting people the right housing intervention if needed, not on deciding who gets access to shelter or outreach services. Approximately half of seasonal shelter guests served in suburban Cook County stay 7 shelter nights or fewer, so the Alliance will focus on persons who spend longer in shelter when assessing them for a potential housing intervention.

The Alliance currently participates in the 100,000 Homes Campaign, led by Community Solutions. The Campaign prioritizes the long-term homeless with certain medical vulnerabilities for housing interventions. Although that campaign is coming to a close in mid-2014, the Alliance is seeking ongoing technical support through future initiatives of Community Solutions, including focused support on coordinated assessment processes.

While the Alliance works to finalize the priorities, the City of Evanston will continue to prioritize households that require shorter, shallower subsidies and have the potential to become self-sufficient in that short time frame. Due to the nature and amount of ESG funds, this population is best served by this type of funding. The City works closely with the Health Department that has recently absorbed the responsibilities of the Evanston Township. The Health Department is now responsible for administering General Assistance funds. There is a large overlap of populations served by both General Assistance and ESG, and staff will be working to ensure funds are spent in the most efficient manner.

Essential services for clients in emergency shelter

ESG funding may be used to provide essential services to individuals and families who are in an emergency shelter. This may include case management, child care, education services, employment assistance and job training, outpatient health services, legal services, life skills

training, mental health services, substance abuse treatment services, transportation, and services for special populations.

ESG subrecipients are responsible for assessing an individual or family's initial need for shelter and must re-assess that need on an ongoing basis to ensure that only those with the greatest need receive ESG-funded emergency shelter assistance. Shelters that serve families must serve all eligible families and may not refuse services based on the age of children or the size of the family.

Rapid Re-Housing: Homeless households whose last permanent address was in Evanston, who resided there for a minimum of six months, and who demonstrate potential to retain permanent housing following a medium-term subsidy of up to six months are eligible for ESG Re-housing.

Risk factors for Rapid Re-housing assistance include, but are not limited to:

- Individuals/Households who lack a fixed, regular, and adequate nighttime residence, meaning:
 - Primary nighttime residence is a public or private place not meant for human habitation; or
 - Living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, and local government programs); or
 - Exiting an institution where (s)he has resided for 90 days or less and resided in an emergency shelter or place not meant for human habitation immediately before entering that institution
- Any individual or family who:
 - Is fleeing, or is attempting to flee, domestic violence;
 - Has no other residence; and
 - Lacks the resources or support networks to obtain other permanent housing

Prevention: Evanston households with incomes under 30% of area median that have potential of remaining stability housed following a medium-term subsidy will be targeted for Prevention.

Risk factors for Prevention assistance include but are not limited to:

- Individual or family at imminent risk of losing their primary nighttime residence:
 - Residence will be lost within 14 days of the date of application for Prevention assistance;
 - No subsequent residence has been identified; and
 - The individual or family lacks the resources or support networks needed to obtain other permanent housing
- Unaccompanied youth under 25 years of years of age, or families with children and youth who do not otherwise qualify as homeless under this definition, but who:
 - Are defined as homeless under the other listed federal statutes;

- Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;
- Have experienced persistent instability as measured by two moves or more in the preceding 60 days; and
- Can be expected to continue in such status for an extended period of time due to special needs or barriers
- An individual or family who:
 - Has an annual income below 30% of median household income for the area based on HUD Part 5 definition; and
 - Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the “homeless” definition; and
 - Meets one of the following conditions:
 - Has moved two or more times because of economic reasons during the 60 days immediately preceding the application for assistance; OR
 - Is living in the home of another because of economic hardship; OR
 - Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days of the date of application for assistance; OR
 - Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; OR
 - Lives in an SRO or efficiency apartment unit in which more than 2 persons reside or in a larger housing unit in which more than one and a half persons per room reside; OR
 - Is exiting a publicly funded institution or system of care; OR
 - Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient’s approved Consolidated Plan
- A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute
- An unaccompanied youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) or that child or youth if living with him or her.

VII. Rent and Utilities Subsidy

Each household’s case will be reviewed by a case manager to assess its capacity to pay a portion of rent and utilities. A household’s contribution to rent and/or utilities generally should not exceed 50% of their gross household income using the HUD Part 5 definition. Subsidies may be deep or shallow based on the unique circumstances of each recipient; the amount of subsidy will be reassessed each month. ESG funds may be used for rent and utilities arrearages on a one time basis, security and utility deposits, first and last month’s rent and rent and utility subsidies

as allowed. The City does not consider any funds for security deposits that are refunded as Program Income and does not expect the Subrecipient to return any such funds.

VIII. Length of Assistance

Initially, Evanston's ESG program was to focus assistance on households that demonstrate likely capacity to maintain stable housing following short-term (up to three month) support. The guideline for length of assistance per household has been extended from up to three months to up to six months, and generally estimated at \$10,000 for families with children and \$6,000 for single adults or couples. This change is being made based on in-market experience in 2013 based on the following factors:

1. Households have not been able to maintain their housing independently following three months of assistance
2. Landlords are unwilling to write leases for clients based on their history of housing and financial instability. Extending the potential timeframe for households from three months to six months (with the potential to go up to twelve months) with clients required to maintain compliance with their case plan in order to qualify for direct assistance, will help overcome this.

All households will be re-evaluated at the end of the three month period and extension of funding may be approved by the Program Review Committee based on need and the availability of funding. It is anticipated that assistance will not exceed six months; no client will receive more than 24 months of assistance in a three-year period.

IX. Type, amount, and duration of housing stabilization and/or relocation services

Housing relocation and/or relocation services provided to the participant will include basic case management. Housing search, placement, legal services, mediation, and credit repair may be a component to case management or referred out to other service providers.

X. Application Process

A household may enter the ESG program through several avenues, including:

1. Referral from City or other sources
2. By contacting Connections for the Homeless directly

After an initial intake screening has been conducted to determine program fit, a potential client will be referred to a case manager who will conduct a full intake application (including initial budget review). Once all information is gathered from the applicant the case manager will present the eligible case to the Program Review Committee. The Review Committee will meet monthly or as needed to review and approve applicants for assistance through ESG or for

referral to other programs or sources. Once an applicant is approved for assistance, case managers will develop a case management plan for each client household. This plan may include referrals to other agencies for needed services (e.g., legal, financial literacy, etc.).

XI. Agency Compensation

Agencies providing ESG eligible services may request reimbursement once funds are spent. Funds may be requested as frequently as once a month, but in no case less than once a quarter. A draw down request form must be submitted along with a match report and source documents for all expenses, including time and activity tracking for staff costs. No funds will be disbursed until all required reports and substantiating documentation are submitted.

XII. Reporting/Data Collection

Performance Standards. The following are preliminary performance standards established by the Suburban Cook County Continuum of Care to measure the goals of reducing and eliminating homelessness.

- Engagement rate: the percent of persons exiting shelter where the destination is known
- Percent of persons exiting shelter who used 30 shelter-nights or fewer
- Percent exited to permanent housing, for each component type (shelter, HP, RRH)
- Follow up on housing status at 6 month following the end of assistance

Reporting requirements for ESG have not been finalized. Once requirements are established, the City of Evanston will work with Subrecipients to establish compliance.

XIII. Case Management Requirements

Case managers will be expected to:

- Conduct an initial intake
- Complete full application with client
- Collect and store verification documents
- Maintain confidentiality as described in the subrecipient agreement for a period of four (4) years following the termination of said agreement.
- Participate in the ESG Program Review Committee, as appropriate
- Assess client needs and coordinate/facilitate the case management service plan
- Follow up with each client to gauge compliance with case management service plan
- Keep case notes for each household served
- Input client level data into HMIS. It is recommended that information be input into HMIS immediately following client contact or service provision.

- Meet with the client(s) at least once a month
- Conduct a home visit at least once during the period of time in which a household is receiving direct assistance
- Conduct a follow up with each client household 6 months after their exit from the ESG program to determine if the client retains their housing and other measures of stability.

All clients should, in addition to the initial case management budget session, receive budgeting help as part of case management or be referred to an approved budget counseling program, such as Money Management International (workshop or telephone consult) or the YWCA Evanston/North Shore (workshop).

Although assistance may be approved for up to six months, case managers may recommend early termination of assistance if it is determined that a household requires less assistance. Assistance must be terminated for any Prevention client whose income equals or exceeds 30% of AMI at their three month evaluation. Either lack of compliance with their case management plan or if information provided in the initial application was false constitutes grounds for immediate termination of assistance.