pennsylvania
DEPARTMENT OF COMMUNITY & ECONOMIC DEVELOPMENT

EMERGENCY SOLUTIONS GRANT

Program Guidelines | April 2020

Commonwealth of Pennsylvania | Tom Wolf, Governor
PA Department of Community & Economic Development | dced.pa.gov

Table of Contents

Section I Introduction 1
A. Definitions 2
B. Eligibility 5

Section II Program Requirements 11
A. ESG Description 11
B. Funding Priorities for Emergency Solutions Grant 11
C. Required Match 13
D. Conditions for Funding 14
E. Federal Requirements 15
F. Application Process 21
G. Application Scoring Criteria 24

Section III DCED's Funding Allocation 24
A. Required Expenditure Deadlines 24
B. Funding Recapture 24

Section IV Application Submission 25
General Application Description Form
Resolution of Municipality
Resolution of the Non-Profit Organization
Limited English Proficiency Guidance for ESG Applicants
Certification of Completion of a Four-Factor Analysis for Limited English Proficiency
Language Access Plan Certification
Management Standards
Timeliness
Coordination of Services
Project Budget
Program Design – Rapid Rehousing
Program Design – Street Outreach
Program Design – Homelessness Prevention
Program Design – Emergency Shelter

Regional Offices
Appendix A FY 2019 ESG Direct Entitlement Areas
Appendix B 2020 Emergency Solutions Grant Application Written Standards List
Appendix C Website and Best Practice References

Section I – Introduction

This program is authorized by McKinney-Vento Homeless Assistance Act of 1987 (P.L. 100-77), as amended by the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009 (P.L. 111-22) (42 U.S.C.S.§11371 et. seq.).

The Department of Community and Economic Development's mission is to encourage the shared prosperity of all Pennsylvanians by supporting good stewardship and sustainable development initiatives across our commonwealth. With a keen eye toward diversity and inclusiveness, we act as advisors and advocates, providing strategic technical assistance, training, and financial resources to help our communities and industries flourish. DCED helps revive Pennsylvania's economy by providing targeted assistance to distressed areas and low-income populations with a strategic focus on community participation and collaborations among residents, nonprofits, and municipalities.

Pennsylvania's renaissance will be driven by the need to increase community revitalization efforts. This translates into the importance of programs such as the Emergency Solutions Grant (ESG) to provide support and opportunity for every homeless individual or family in the commonwealth. The ESG program will offer a proactive approach with respect to its goals, which aim to offer resources in addressing the needs of homeless people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.

The Commonwealth of Pennsylvania, through DCED, anticipates being awarded $5,500,000 in ESG funds for FY2020 through the U.S. Department of Housing and Urban Development (HUD). DCED's priority for the use of ESG funding will continue to include rapidly rehousing homeless individuals and families in accordance with the funding priority established by HUD. HUD's core mission is to ensure the most vulnerable populations receive the best outcomes and highest standards of service. DCED will use the ESG funding to support applicants who will work to end homelessness quickly and as efficiently as possible for all vulnerable populations.

All funded applicants will use a coordinated entry process established by the local Continuum of Care, to ensure the homeless crisis response system is easy to access, the needs of the homeless population are quickly identified and assessed, and priority decisions are based on those known needs. Funded applicants will be expected to use a Housing First (see page 4) approach by ensuring people experiencing a housing crisis are quickly connected to permanent housing. All eligible activities include those listed in the ESG interim rule published in the Federal Register on December 5, 2011 located at 24 CFR 576.

DCED will adhere to the Commonwealth of Pennsylvania's Keystone Principles for Growth, Investment and Resource Conservation in making selection of projects to receive ESG funds. Although emphasis will be placed on the Rapid Rehousing category of the program, the priorities for the ESG funding contained in these guidelines are consistent and flow from the Keystone Principles.

Applicants should complete the Electronic Single Application (ESA), associated forms, attachments, addenda, and submit a signature page and other required documentation in accordance with instructions as indicated in these guidelines. The application process is outlined in more detail in the application submission section.

A. Definitions

Administrative Costs – Include the costs of overall program management, coordination, monitoring, and evaluation.

Applicant – Any unit of local government including cities, boroughs, townships, towns, counties, home rule municipalities, and communities that desire to apply "on behalf of" other municipalities. Non-profits may not apply directly to DCED except for non-profits applying for a regional (multi-county) project.

At-Risk of Homelessness
More detailed description of this term may be found in the HEARTH "Homeless" Definition (Final Rule) on www.hudexchange.info

1. An individual or family who:
   a. Has an annual income below 30 percent of median family income for the area, as determined by HUD;
   b. Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the ''homeless'' definition in this section; and
   c. Meets one of the following conditions:
      (1) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
      (2) Is living in the home of another because of economic hardship;
      (3) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
      (4) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;
      (5) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons per room, as defined by the U.S. Census Bureau;
      (6) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
      (7) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the DCED's approved consolidated plan;
2. A child or youth who does not qualify as ''homeless'' under this section, but qualifies as ''homeless'' under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e– 2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or
3. A child or youth who does not qualify as ''homeless'' under this section but qualifies as ''homeless'' under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C.11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

Direct Entitlement Community – Any unit of local government including cities, boroughs, townships, towns, counties, home rule municipalities, and/or other communities that receive a direct allocation of ESG funding from HUD. A list of the FY 2019 direct entitlement ESG communities are listed in Appendix A.

Emergency Shelter – Any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements. Any project funded as a transitional shelter under a Fiscal Year 2010 Emergency Shelter Grant may continue to be funded under ESG.

Grantee – Any unit of local government (including cities, boroughs, townships, towns, counties, home rule municipalities), communities, or non-profits that is awarded state ESG funds.

Homeless Definition – (all participants must meet the definition of homeless)
More detailed description of this term may be found in the HEARTH "Homeless" Definition (Final Rule) on www.hudexchange.info

1. An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
   a. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
   b. An individual or family living in a supervised 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, or local government programs for low income individuals); or
   c. An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;
2. An individual or family who will imminently lose their primary nighttime residence provided that:
   a. The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
   b. No subsequent residence has been identified; and
   c. The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;
3. Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:
   a. Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e–2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
   b. Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
   c. Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and

d. Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or

4. Any individual or family who:
   a. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
   b. Has no other residence; and
   c. Lacks the resources or support networks, e.g., family, friends, faith based or other social networks, to obtain other permanent housing.

Homeless Management Information System (HMIS) – A database used to confidentially aggregate data on homeless populations. The system allows for a record of client-level information about the characteristics and services needs of homeless persons.

Homelessness Prevention – Financial assistance, rental assistance, and services provided to individuals and families who are at imminent risk, or at risk of homelessness; meaning those who qualify under the homeless definition (categories 2, 3, or 4) or those who qualify as at risk of homelessness as issued in HUD's regulations. Eligible individuals and families must have annual incomes below 30% of Area Median Income (AMI).

Housing First – Homeless assistance approach that prioritizes providing permanent housing to people experiencing homelessness, thus ending their homelessness and serving as a platform from which they can pursue personal goals and improve their quality of life. This approach is guided by the belief that people need basic necessities like food and shelter before focusing on next steps, such as employment, personal finance, and/or substance abuse issues. Additionally, Housing First is based on the theory that client choice is valuable in housing selection and supportive service participation, and that exercising that choice is likely to make a client more successful in remaining housed and improving their life. (National Alliance to End Homelessness, 2019)

Participants – A homeless or at-risk of homeless individual or family who receive ESG assistance.

Rapid Re-housing – Financial assistance, rental assistance, and services provided to individuals and families who are literally homeless, meaning those who qualify under the Category 1 definition of homeless.

Street Outreach – Provision of essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility.

Subrecipient – A non-profit organization that enters into a subrecipient agreement with the grantee to provide homeless services as outlined in the ESG application proposal.

B. Eligibility

1. **Applicants**
   DCED will accept applications from any unit of local government including cities, boroughs, townships, towns, counties, home rule municipalities, and communities that desire to apply "on behalf of" other municipalities. Local governments may apply "on behalf of" nonprofit organizations which will perform services as a subrecipient or subgrantee. Nonprofits are eligible applicants or grantees to the extent the project will address a demonstrated regional need.

   DCED intends to make grants of $35,000 or more for any single activity or combination of ESG activities as outlined below:

   - Rapid Rehousing
   - Street Outreach
   - Homelessness Prevention
   - Emergency Shelter
   - Homeless Management Information System (HMIS)
   - Administration

   Successful applicants who do not intend to provide direct services are required to enter into agreements with local housing and third party subrecipients. The agreement with a subrecipient does not absolve the successful applicant of its contractual responsibilities with DCED. The grantee should hold the subrecipient to high standards and develop a grant agreement that reflect similar contractual responsibilities as the grantee has with DCED. Grantees are to ensure, through regular monitoring and oversight, that subrecipients provide eligible and DCED approved services.

   The Pennsylvania Balance of State Continuums of Care will receive funding priority with the submission of a successful application.

   ESG Direct Entitlement Communities (Appendix A) are eligible to compete for DCED's ESG funding but will not receive priority over the non-entitlement ESG applicants (those entities who do not receive a direct allocation of ESG funds from HUD). DCED will only fund Rapid Rehousing activities for Direct Entitlement Communities that meet application requirements, to ensure funding flexibility for the non-entitlement applicants. Direct entitlement or non-entitlement communities applying on behalf of subrecipients must identify in their narrative, whether the subrecipient receives any amount of the direct entitlement ESG funding for the same activities they are requesting ESG funding for from DCED.

2. **Eligible Activities**
   ESG Funds may be used for individuals and families who are experiencing homelessness or at risk of homeless as defined in 24 CFR 576. The six eligible components for ESG funding are:

   1.) Rapid Rehousing,
   2.) Street Outreach,
   3.) Homelessness Prevention,
   4.) Emergency Shelter,
   5.) HMIS, and
   6.) Administrative costs.

   Emergency Shelter component (shelter operations, essential services and/or street outreach) requests may not exceed 60% of the total request. Administrative funds may not exceed 3.75% of the total requested.

Although services are allowable for up to 24 months in accordance with 24 CFR 576, contracts will not extend beyond 18 months. Therefore, all activities must be completed within 18 months. ***Subrecipients or service providers shall not obligate any assistance beyond the 18-month term of their contract with the commonwealth.***

3. **Use of Grant Funds**
   Grant funds must be used for eligible activities as described in the HUD ESG regulations (www.hudexchange.info/programs/esg/esg-law-regulations-and-notices/) and as outlined below. Applicants are encouraged to review this table along with the ESG regulations published on December 5, 2011 for a more complete description of each activity. **Only activities listed in the ESG interim rule at 24 CFR 576 are eligible under the ESG state allocation.** If an activity is not listed, it is not considered eligible for this funding source.

Eligible Activities	
Street Outreach Component (24CFR §576.101) Services delivered on the street to persons living unsheltered	
Engagement	Activities to locate, identify, and build relationships with **unsheltered homeless people** for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs.
Case Management	Assessing housing and service needs and arranging/coordinating/monitoring the delivery of individualized services.
Emergency Health Services	Direct outpatient treatment of medical conditions by licensed medical professionals in community-based settings (e.g. streets, parks, and campgrounds) to those eligible participants for whom other appropriate health services are inaccessible or unavailable within the area.
Emergency Mental Health Services	Direct outpatient treatment of mental health conditions by licensed professionals in community-based settings (e.g. streets, parks, and campgrounds) to those eligible participants for whom other appropriate health services are inaccessible or unavailable within the area.
Transportation	Travel by outreach workers, social workers, medical professionals or other service providers during the provision of eligible street outreach services.
Services to Special Populations	Otherwise eligible Essential Services, as listed above, that have been tailored to address the special needs of homeless youth, victims of domestic violence and related crimes/threats, and/or people living with HIV/AIDS who are literally homeless.

Emergency Shelter Component (24CFR §576.102) Services delivered to homeless persons in temporary shelter, rehabilitation of that shelter, and operation of shelters	
Essential Services	• Case Management • Child Care • Education Services • Employment Assistance and Job Training • Legal Services • Life Skills Training • Mental Health Services • Substance Abuse treatment Services • Transportation • Services for Special Populations • Outpatient health services
Renovation	• Major Renovation – costs exceed 75% of the value of the building before renovation must commit to 10-year use. • Conversion – costs to convert a building into a shelter exceeds 75% of the building after rehabilitation must commit to 10-year use. • Renovation other than major renovation or conversion – all other types of renovation must commit to 3-year use. • Signed contracts with firms doing the renovations/conversions or material purchase must be submitted to DCED within the first 6 months of the contract. Work should be completed within the first 9 months of the contract. • All additional funding necessary for the project must be in place • Priority will be given to the following documented needs: Code Deficiencies — ADA Compliance Increase in Bed Capacity — Energy Conservation Health and Safety Issues
Shelter Operations	• Maintenance & repairs • Rent • Security • Fuel • Equipment • Utilities • Food • Furnishings • Insurance • Supplies necessary for the operation of the shelter • Hotel/Motel –when no appropriate shelter is available Funding request should not exceed 18 months and no greater than 25% of the total shelter operating budget for the same period.

For both Rapid Re-housing and Homelessness Prevention Components	
Housing Relocation and Stabilization Services (24CFR §576.105)	
(a) Financial Assistance	
Rental Application Fees	• Application fees that are charged by the owner to all applicants
Security Deposits	• Equal to no more than 2 months' rent.
Last Month's Rent	• Paid to the owner of housing at the time security deposit and first month's rent if necessary to obtain housing. (Is counted toward the 24 months of assistance in 3 years.)
Moving Costs	• Funds may be used for reasonable moving costs, such as truck rental, hiring a moving company, or temporary storage fees for a maximum of 3 months after the participant begins to receive services but before they move into permanent housing. Arrearages are not eligible.
Utility Deposits	• Standard utility deposit required by the utility company for all customers (i.e. gas, electric, water/sewage)
Utility Payments	• Up to 24 months of utility payments per participant, per service (i.e. gas, electric, water/sewage), including up to 6 months of arrearages, per service.
(b) Services Costs	
Housing Search and Placement	• Assessment of housing barriers, needs and preferences • Development of an action plan for locating housing • Housing search and outreach to, and negotiation with owner • 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 with obtaining utilities and making moving arrangements • Tenant counseling
Housing Stability Case Management	Assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability. • Using the centralized or coordinated assessment system to conduct the initial evaluation and re-evaluation. • Counseling • Developing, securing and coordinating services including Federal, state, and local benefits • Monitoring and evaluating program participant progress • Providing information and referrals to other providers • Developing an individualized housing and service plan • Assistance cannot exceed 30 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing

Mediation	*Mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the program participant from losing permanent housing in which they currently reside.* • Time and/or services associated with mediation activities
Legal Services	*Legal services that are necessary to resolve a legal problem that prohibits the program participant from obtaining or maintaining permanent housing.* • Hourly fees for legal advice and representation • Fees based on the actual service performed (i.e. fee for service), but only if the cost would be less than the cost of hourly fees. • Client intake, preparation of cases for trial, provision of legal advice, representation at hearings and counseling • Filing fees and other necessary court costs • Subrecipient's employees' salaries and other costs necessary to perform the services if the subrecipient is a legal services provider and performs the services itself. Note: Legal services related to mortgages are not eligible Legal representation and advice may be provided for: • Landlord/tenant matters • Child support • Guardianship • Paternity • Emancipation • Legal separation • Resolution of outstanding criminal warrants • Orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking. • Appeal of veterans and public benefit claim denials
Credit Repair	• Services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. • Assistance cannot include the payment or modification of a debt.
Requirements and Restrictions for Services	• Participants must meet with a case manager at least once a month for the duration of assistance, except where funding under the Violence Against Women Act (VAWA) or Family Violence Prevention and Services Act (FVSP) prohibits the recipient or subrecipient from making shelter or housing conditional upon receipt of services. • Participants must be assisted as needed, in obtaining: - Appropriate supportive services like medical or mental health treatment or services essential for independent living. - Mainstream benefits like Medicaid, SSI, or TANF
Short- and Medium-Term Rental Assistance (24CFR § 576.106)	
Types of Rental Assistance	**Length of Assistance**
Short Term Rental Assistance	Up to 3 Months
Medium Term Rental Assistance	4 to 24 Months
Payment of Rental Arrears	One-time payment up to 6 months, including any late fees on those arrears
Any Combination of the Three Types of Rental Assistance	Total not to exceed 24 months during any 3-year period, including any payment for last month's rent.

Requirements and Restrictions	• Compliance with Fair Market Rents (FMR) limits and Rent Reasonableness • Compliance with Minimum Habitability Standards • Rental Assistance Agreement and Lease Standards: - The rental assistance agreement must set forth the terms under which rental assistance will be provided - Each participant receiving rental assistance must have a legally binding, written lease (between the owner and participant) for the rental unit, unless the assistance is solely for rental arrears. - Project-based rental assistance leases must have an initial term of one year. • **Cannot Use** with Other Subsidies - No rental assistance can be provided to a household receiving rental assistance from another public source for the same period (except 6 months of arrears) - Rental assistance may not be provided to a participant who is currently receiving replacement housing payments under the Uniform Relocation Assistance (URA). • Late Payments - The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease. - The recipient or subrecipient must make timely payments to owners in accordance with the rental assistance agreement. - The recipient or subrecipient is solely responsible for paying (with non-ESG funds) late payment penalties that it incurs.
HMIS (24CFR § 576.107)	
HMIS	• **The HEARTH Act makes HMIS participation a statutory requirement for ESG recipients and third-party contractors.** - Third-party contractors serving victims of domestic violence cannot, and legal services organizations may choose to not, participate in HMIS. Providers that do not participate in HMIS must use a comparable database that produces unduplicated, aggregate reports instead. - All recipients and third-party contractors may pay the costs of contributing data to the CoC's HMIS. - Recipients and third-party contractors that use comparable databases: Victim third-party contractors and legal third-party contractors may use ESG funds to pay the costs of establishing and operating a comparable database. - Recipients that have been designated HMIS Lead agencies by the CoC may pay the costs of establishing, hosting, customizing, and upgrading the HMIS.
Eligible Costs	• Hardware, Equipment and Software Costs • Staffing: Paying salaries for operating HMIS • Training and Overhead
Administrative Costs (24CFR §576.108)	
Administrative Costs	Applicants may request up to 3.75% of its ESG grant for the payment of administrative costs related to the planning and execution of ESG activities. Eligible Costs Include: - General Management/Oversight/Coordination - Training on ESG Requirements - Environmental Review

Section II – Program Requirements

A. ESG Description

The Emergency Solutions Grant (ESG) Program is authorized by subtitle B of Title IV – Housing Assistance Act as amended by S.896 The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009. The ESG interim rule 24 CFR Part 576, published in the Federal Register on December 5, 2011, establishes the regulations for the Emergency Solutions Grant Program. The program focus is to assist people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness. The program authorizes the U.S. Department of Housing and Urban Development (HUD) to make grants to states, units of general purpose local government, and territories for rapid rehousing and homeless prevention assistance, street outreach, the rehabilitation or conversion of buildings for use as emergency shelters for the homeless, and for the payment of certain expenses related to operating emergency shelters.

The intent of ESG assistance is to rapidly transition homeless individuals and families to permanent stability through their own means or through public assistance, as appropriate. Funding provided under ESG is not intended to provide long-term support, nor will it be able to address all the financial and supportive service needs of each individual and/or family. Applicants are required to design or adopt a service delivery system to achieve ESG goals and objectives but using approaches that are responsive to local issues and local Continuum of Care requirements.

B. DCED Funding Priorities for Emergency Solutions Grant

DCED will support the federal strategy outlined by the United States Interagency Council on Homelessness and prioritize applicants who request funding to address the specific homeless populations in *Home, Together: A Federal Strategic Plan to Prevent and End Homelessness*[1]. *Home, Together* established goals from 2018-2022 to prevent and end veteran homelessness; to end chronic homelessness; to prevent and end homelessness for families, youth, and children; and to set a path to end all types of homelessness. Applicants to DCED's Emergency Solutions Grant (ESG) program are required to participate in their local Continuum of Care (CoC)'s planning to develop a systematic response to prevent homelessness. If homelessness is unpreventable, communities should plan that instances are rare, brief, and one-time.

DCED requires the use of the Housing First model to end homelessness with ESG funds. Housing First is an approach to provide permanent housing immediately and with few to no preconditions, behavioral contingencies, or barriers. The outcomes of the model will align with the coordinated entry quick access to housing and services, identifying and implementing low barriers to entry or service, utilizing data to drive decisions about housing prioritization, establishing relationships with housing providers to ensure a direct referral from the coordinated entry process, standardizing application screening processes, consistent involvement in the planning process with the CoC, using mainstream systems to support the housing first approach, and ensuring staff are adequately trained to employ evidenced-based systems. Communities are expected to prioritize individuals and families with the highest needs and vulnerabilities, work effectively to engage landlords and property owners to ensure housing availability, and to ensure programs are client-centered with all barriers removed for entering and remaining in the program.

[1] Home, Together (2018). *Home, Together: A Federal Strategic Plan to Prevent and End Homelessness.* Retrieved from www.usich.gov/home-together

DCED will provide maximum support available to applicants who address these specific areas. However, no more than 60% of the state's grant will be allocated to Emergency Shelter activities, excluding administration and data collection activities for the Pennsylvania Homeless Management Information System (HMIS). DCED reserves the right to modify any of the priorities as deemed necessary. Decisions to modify priorities are based on data assessments.

DCED will continue to permit applicants to design diverse projects to meet their local needs. However, we require each applicant to demonstrate coordination of their efforts with the local Continuum of Care priorities and demonstrate capacity to meet all ESG program requirements.

Applicants who design regional projects will be highly considered for funding if the project addresses a statewide need that is supported by data, is administered by an organization with capacity to fulfill all programmatic requirements and has identified its ability to meet the match requirement.

DCED will contract directly with non-profit organizations that apply for a regional based project and demonstrates capacity to administer the grant.

C. Required Match

Applicants are required to match 100 percent of their grant request and subsequent award. Match can include cash resources provided any time after the start date of the contract with the commonwealth. Match contributions must meet all requirements that apply to ESG funds and must be expended in accordance with the regulatory guidance.

Match may be obtained from any source including federal (other than ESG funds), state, local and private sources. However, the following requirements apply to matching contributions from a federal source of funds:

1. The applicant must ensure the laws governing any funds to be used as matching contributions do not prohibit those funds from being used to match ESG funds.
2. If ESG funds are used to satisfy the matching requirements of another Federal program, then funding from that program may not be used to satisfy the matching requirements under this section.

In order to meet the matching requirement, the matching contributions must:

1. Meet all requirements that apply to the ESG funds provided by HUD, except for the expenditure limits in 24 CFR § 576.100. (HUD regulations)
2. The matching contributions must be provided within the dates of the contract with the commonwealth.
3. To count toward the required match for the recipient's fiscal year grant, cash contributions must be expended within the expenditure deadline in 24 CFR 576.201 and noncash contributions must be made within the expenditure deadline in 24 CFR 576.201.
4. Contributions used to match a previous ESG grant may not be used to match a subsequent ESG grant.
5. Contributions that have been or will be counted as satisfying a matching requirement of another federal grant or award may not count as satisfying the matching requirement of this section.

The matching requirement may be met by one or both of the following:

1. **Cash contributions.** Cash expended for allowable costs, as defined in the Office of Management and Budget (OMB) Circular (2 CFR part 200), of the applicant, grantee, or subrecipient.

2. **Noncash contributions.** The value of any real property, equipment, goods, or services contributed to the grantee or subrecipients ESG program, provided that if the grantee or subrecipient had to pay for them with grant funds, the costs would have been allowable.

    a. Noncash contributions may also include the purchase value of any donated real property, if the property was donated within the contract period. To determine the value of any donated material or building, or of any lease, the grantee or subrecipient must use a method reasonably calculated to establish the fair market value. See IRS regulations related to donations.

    b. Services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work in the applicant's or third party subrecipient's organization. If the grantee or subrecipient does not have employees performing similar work, the rates must be consistent with those ordinarily paid by other employers for similar work in the same labor market.

    c. Some noncash contributions are real property, equipment, goods, or services that, if the grantee or subrecipient had to pay for them with grant funds, the payments would have been indirect costs. Matching credit for these contributions must be given only if the grantee or subrecipient has established, along with its regular indirect cost rate, a special rate for allocating to individual projects or programs the value of those contributions.

3. **Program Income.** Costs paid by program income (as defined at 2 CFR Part 200) during the contract period will count towards meeting the match requirement provided that the costs are eligible expenses that supplement the ESG program. Program income includes any amount of security or utility deposit returned to the grantee or subrecipient. Subrecipients providing security or utility deposits, must return these funds to their grantee when clients assisted with ESG funding move from the rental property or utility services are discontinued.

4. **Match Waiver.** The first $100,000 of the commonwealth's fiscal year grant is not required to be matched. DCED must transfer the benefit of this exception to its grantees that are incapable of providing match contributions. Applicants that anticipate difficulty meeting the match requirement may request a match waiver. DCED will use the following criteria to determine the applicant most likely to receive the exception:

    - annual operating budget of less than $100,000; and,
    - serving an area with predominately low and moderate income (LMI) persons (more than 60% LMI) or;
    - an applicant that may not be able to apply for ESG due to lack of resources to meet the match requirement. Applying for the match waiver does not guarantee applicants will or will not receive funding.

The following may not be used as match: Supplemental Nutrition Assistance Program (SNAP) benefits, Housing Choice Vouchers, the tenant's portion of the rent, HOME-TBRA (Tenant-Based Rental Assistance) funds (in most instances), CoC funds (in most instances) and Depreciation of Buildings.

D. Conditions for Funding

1. **Statement of Need**
   Applicants must provide a need based and data-informed narrative that gives a detailed explanation of the homeless population in the community, a description of how the agency provides a comprehensive range of services by connecting participants with mainstream resources, and details to indicate if there is a gap in services that would prohibit the participant from gaining permanent housing stability. The applicant should include actual assessments of the number of individuals/families served in the past, if applicable, the unemployment rates of the community to be served, the most recent Point-in-Time data of the unsheltered homeless population, how long participants remain homeless before receiving permanent housing, identified barriers to entering the homeless system, and any other data that may support the funding requested.

   The applicant must demonstrate how the funding will impact the community and how the services are aligned to meet the local Continuum of Care strategic plan, written standards and system performance measures. If applicant is a not a Balance of State CoC, a copy of the performance measures should be included with the application. Additionally, all subrecipient program design forms must respond to how the agency intends to meet the needs outlined in the statement of need narrative.

2. **HMIS**
   Grantees are required to input their homeless data into an HMIS. Domestic violence providers are prohibited from using an HMIS and therefore, must use a comparable database.

3. **Housing First**
   Grantees and their subrecipients are required to use the Housing First approach to providing services. Applicants must demonstrate how the Housing First model will be implemented in the community for each activity of funding requested. HUD has identified the following as barriers to accessing housing services: having too little or little income, active or history of substance abuse, having a criminal record with exceptions for state-mandated restrictions, and fleeing domestic violence (e.g., lack of a protective order, period of separation from abuser, or law enforcement involvement). HUD has identified the following as reasons for project termination: failure to participate in supportive services, failure to make progress on a service plan, loss of income or failure to improve income, fleeing domestic violence, and any other activity not covered in a lease agreement typically found in the project's geographic area. If an agency has not eliminated any of these barriers, they are not implementing the Housing First approach.

4. **Solicitation of Participants**
   Conducting outreach to the community to solicit participants is a reimbursable expense. The applicant must identify how the community will receive a notification of available services including identifying priority populations to be served. Methods of conducting outreach may include social media notifications, flyers outlining specific ESG services available, newspaper notifications, etc. The outreach must identify the specific ESG services available and should not be an advertisement for other services in your agency.

5. **Residency Requirement**
   Applicants must not place a residency requirement on participants to receive assistance. The goal of the Continuum of Care under the 2009 HEARTH Act is to provide assistance to qualified applicants without boundaries or barriers. DCED understands that many financial donations from units of local government and other funding sources, which may be used to match ESG funding, may require a residency limitation. ESG funding priority will be given to those programs that do not have a residency requirement for assistance. Programs that have a residency requirement but are willing after a short period of time, to open their services to persons outside of their service area, will receive second priority. Programs that maintain their residency requirements although they may have open beds or no clients, will not receive points in this section during the application evaluation.

6. **Project Design Forms**
   One project design form must be submitted for each subrecipient anticipated to provide services.

7. **Point-in-Time Count**
   All ESG funded applicants will be required to participate in the annual Point-in-Time count. Identify how the applicant and/or subrecipients applying on behalf of will participate in the count. Provide a timeline of activities required to meet the outcome ending with the anticipated date of the count (last Wednesday in January). Participation examples are coordinating logistics of the count with the local CoC, RHAB, County, City, or Provider agencies; organizing volunteers who will do the count; serving on a PIT committee, etc.

8. **Reporting**
   Grantees will highlight and include success stories with their final Fiscal Status report at closeout of the contract. Highlights must also include a recommendation to DCED for a site visit by one of the following: the Center for Community and Housing Development Director, a Regional DCED staff, the Deputy or Executive Deputy Secretary, the Secretary, and/or a member within the Governor's executive administration. These stories should illustrate how the ESG funded project had a positive impact in the community it serves.

   Additional federal program reports required by the Center for Community and Housing Development include: quarterly, biennial, and annual reports. A schedule of these reports will be sent to funded applicants.

9. **Rent Reasonableness & Fair Market Rent**
   Grantees providing rental assistance must develop and implement standards which ensure a mechanism for determining that the actual rental costs of units assisted are in compliance with HUD's Fair Market Rent, as provided under 24 CFR part 888 and complies with HUD's standard of "rent reasonableness" as established under 24 CFR § 982.507. Rent Reasonableness means that the total rent charged for a unit must be reasonable in relation to the rents being charged during the same period for comparable units in the private unassisted market and must not be more than rents being charged by the owner during the same time period for comparable non-luxury unassisted units. See HUD's worksheet on rent reasonableness at: www.hud.gov/offices/cpd/affordablehousing/library/forms/rentreasonablechecklist.doc.

   Habitability Requirements:
   All units receiving rental assistance must be inspected and meet HUD's habitability standards if rental assistance is provided.

10. **Risk Analysis**
    All Grantees will be assessed a risk level upon review of application and if awarded will be monitored during the course of their contract. Grantees assessed as high risk will receive technical assistance during the first year of award and will receive an onsite monitoring. Grantees assessed as moderate risk will receive technical assistance and may receive either an onsite monitoring or a desk audit. Low risk Grantees may receive a desk audit.

E. Federal Requirements

1. **Area-wide systems coordination requirements – 24 CFR §576.400**
   Coordination with other Targeted Homeless Services – 24 CFR §576.400(b)
   Grantees and/or subrecipients must coordinate and integrate, to the maximum extent practicable, ESG-funded activities with other programs targeted to provide services to homeless people in the area covered by the Continuum of Care or an area where services are coordinated to provide a strategic, community-wide system to prevent and end homelessness for that area.

System and Program Coordination with Mainstream resources – 24 CFR §576.400(c)
Grantee and/or subrecipients must coordinate and integrate, to the maximum extent practicable, ESG funded activities with mainstream housing, health, social services, employment, education, and youth programs for homeless individuals/families and those who are at risk of homelessness. Refer to 24 CFR §576.400(b) for a list of mainstream resources to coordinate ESG activities.

Centralized or Coordinated Assessment – 24 CFR §576.400(d)
CoCs are required to establish a centralized or coordinated assessment system. Grantees and their subrecipients will be required to participate in the centralized system. The grantee must maintain evidence of the use of, and written intake procedures for, the centralized or coordinated assessment systems(s) developed by the Continuum of Care. If the local CoC does not yet have a centralized or coordinated assessment system or procedures or if the subrecipient is a legal or a victim service provider choosing not to use the CoC centralized or coordinated assessment system, grantee must have available and consistently apply written standards for assessment.

2. **Written Standards for Providing ESG assistance – 24 CFR §576.400(e)**
Grantees must establish and consistently apply within their program, written standards for providing ESG assistance. Applicants must provide to the Department a copy of the written standards for providing ESG assistance with the application materials. Refer to 24 CFR §576.400(d) about written standards. The standards must include at a minimum:

- Standard policies and procedures for evaluating individuals' and families' eligibility for ESG assistance;
- Standards for targeting persons experiencing homelessness and providing essential services related to street outreach;
- Policies and procedures for admission, diversion, referral, and discharge by emergency shelters assisted under ESG, including standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations, e.g., victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing and are likely to be homeless the longest;
- Policies and procedures for assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to emergency shelter;
- Policies and procedures for coordination among rapid re-housing assistance providers, homelessness prevention, and emergency shelter providers, other homeless assistance providers; and mainstream service and housing providers listed on 24 CFR §576.400(b) and (c);
- Policies and procedures for determining and prioritizing which eligible families and individuals will receive rapid re-housing assistance and homelessness prevention assistance;
- Standards for determining what percentage or amount of rent and utilities costs each program participant must pay, when applicable, while receiving homeless assistance;
- Standards for determining how long a program participant will be provided with rental assistance and how the amount of that assistance will be adjusted over time;
- Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to be provided to a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participant may receive assistance; or the maximum number of times the program participant may receive assistance; and
- The utilization of a Limited English Proficiency Plan.

The standards must be effective for ensuring individuals and families applying for and receiving assistance, are able to gain or re-gain long-term housing stability and avoid relapses in homelessness. The standards will include a detailed description of all items listed on the written standards form (see Appendix B). The standards should not be provided by individual subrecipients, but overall standards adopted by the applicant; that all subrecipients must adhere to.

3. **Participation in HMIS 24 CFR §576.400(f)**
   Grantees will be required to ensure that data on all persons served and all activities provided under ESG are entered into the community-wide HMIS system designated by the CoC for the area in which those persons and activities are located, or a comparable database, in accordance with HUD's standards on participation, data collection, and reporting under a local HMIS.

   Victim service providers or a legal services provider may use a comparable database that collects client-level data and generates unduplicated aggregate reports based on the data. The comparable database must comply with all current HMIS standards including data information, security, data quality, and processing standards, as established by HUD in its latest HMIS Data Standards guide.

4. **Evaluation of Program Participant Eligibility and Needs – 24 CFR §576.401**
   Grantees must conduct an initial evaluation to determine the eligibility of each individual or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability into permanent housing. These evaluations must be conducted in accordance with the centralized or coordinated assessment requirements set forth under 24 CFR §576.400(d) and the written standards established under 24 CFR §576.400(e) and all the guidelines outlined on 24 CFR §576.401(a).

   Re-evaluation of the program participant's eligibility and the types and amounts of assistance the program participant needs must be conducted according to the requirements outlined in 24 CFR §576.401(a). Each program participant receiving Rapid Re-housing and Homelessness Prevention assistance is required to meet regularly with a case manager (except where prohibited by Violence Against Women Act ("VAWA") and the Family Violence Prevention and Services Act ("FVPSA")) and the assistance provider must develop an individualized plan to help that program participant retain permanent housing after the ESG assistance ends. These requirements are intended to help ensure that the ESG-funded emergency, short-term or medium-term assistance will be effective in helping program participants regain long-term housing stability and avoid relapses into homelessness.

5. **Terminating Assistance – 24 CFR §576.402**
   If a program participant who receives ESG assistance violates program requirements, assistance may be terminated in accordance with a formal process established by the Grantee that protects the rights of the individuals affected. Therefore, a formal process must be in place. This applies to all forms of ESG assistance. For more information, refer to the guidelines outlined in 24 CFR §576.402. A copy of the termination policy must be included in the application.

6. **Shelter and Housing Standards – 24 CFR §576.403**
   Subrecipients are responsible for the performance of inspections to ensure that shelter and housing occupied by ESG participants meets the following standards.

   a. **Lead Based Paint Act – 24 CFR §576.403(a)**
      Lead-based paint remediation and disclosure applies to all ESG-funded shelters and all housing occupied by ESG participants. The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), and the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C 4851-4856), subparts of the implementing regulations at 24 CFR Part 35, Subparts A, B, H, J, K, M and R apply to activities under this grant program. The Grantee must also comply with the Lead, Renovation, Repair, and Painting Program Final Rule, 40 CFR Part 745, where applicable.

b. **Minimum Standards for Emergency Shelters and for permanent housing 24 CFR §576.403(b)&(c)**
Emergency shelters that receive assistance for shelter operations are required to meet habitability standards. If ESG funds are used to help a program participant remain in or move into permanent housing, that housing must also meet habitability standards. The minimum standard for emergency shelters and permanent housing include standards for structure and material, access, space and security, interior air quality, water supply, sanitary facilities, thermal environment, illumination and electricity, food preparation, sanitary conditions and fire safety. Shelters renovated with ESG funds are also required to meet state or local government safety and sanitation-standards as applicable and use energy-efficient materials including Energy Star and WaterSense products and appliances. Refer to 24 CFR §576.403 for details on the housing standards.

c. **Access**
Shelters receiving ESG funds must also meet the accessibility standards under Section 504 of the Rehabilitation Act of 1973 (5 U.S.C. 794), The Fair Housing Act (42 U.S.C. 3601 et seq.) and Titles II and III of the Americans with Disabilities Act (42 U.S.C. §§ 12131-12189; 47 U.S.C. 155, 201, 218 and 255).

7. **Conflicts of Interest – 24 CFR §576.404**
Grantees are expected to follow the conflict of interest standards outlined in 24 CFR §576.404 related to the provision of ESG assistance, and procurement of goods and services. All subrecipients must comply with these same requirements.

8. **Homeless Participation – 24 CFR §576.405**
The provisions requiring homeless participation on boards or in an advisory capacity can be fulfilled by ESG Grantees bringing any policy decisions regarding their facility and services to the CoC governing board where homeless participation is already existing. Also, to the maximum extent practicable, Grantees should involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted with ESG.

9. **Faith-Based Activities 24 CFR §576.406**
Organizations that are religious or faith-based are eligible, on the same basis as any other organization, to receive ESG funds. The State will not discriminate against an organization based on the organization's religious character or affiliation. However, you may not engage in inherently religious activities, such as worship, religious instruction, or proselytization as part of the programs or services funded under ESG. If an organization conducts these activities, the activities must be offered separately, in time or location, from the programs or services funded under ESG, and participation must be voluntary for program participants.

An organization that receives ESG funds shall not, in providing ESG assistance, discriminate against a program participant or prospective program participant on the basis of religion or religious belief. When using ESG funds for the rehabilitation of structures, faith-based organizations will be expected to follow the guidelines outlined in 24 CFR §576.406.

10. **Environmental Review Responsibilities – 24 CFR §576.407(d)**
The passage of legislation on July 5, 2012 that amends certain provisions of the HEARTH Act, 24 CFR Part 58 must be followed by all ESG Grantees to comply with environmental requirements. All ESG activities will require some level of environmental review & clearance. No funds may be expended until an environmental review that meets the standards outlined in 24 CFR Part 58 has been submitted and approved by DCED.

11. **Procurement of Recovered Materials – 24 CFR §576.407(f)**
    Subrecipients and its contractors must comply with Section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act. The requirements of Section 6002 include procuring only items designated in guidelines of the Environmental Protection Agency (EPA) at 40 C.F.R Part 247 that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the item exceeds $10,000 or the value of the quantity acquired in the preceding fiscal year exceeded $10,000; procuring solid waste management services in a manner that maximizes energy and resource recovery; and an affirmative procurement program for procurement of recovered materials identified in the EPA guidelines.

12. **Displacement, Relocation, and Acquisition 24 CFR §576.408**
    Consistent with the other goals and objectives of ESG, the Grantee must assure that it has taken all reasonable steps to minimize the displacement of persons (families, individuals, businesses, nonprofit organizations, and farms) as a result of a project assisted under ESG. Subrecipients must follow the requirements in 24 CFR §576.408 related to temporary relocation (not permitted), relocation assistance for displaced persons and real property acquisition requirements and appeals. ESG funds must comply with Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) (49 CFR Part 24) and policy guidance in Real Estate Acquisition and Relocation Policy and Guidance (HUD Handbook 1378).

13. **Recordkeeping and Reporting Requirements – 24 CFR §576.500**
    Grantees will be required to show compliance with the program's regulations through the appropriate records, including documentation of homeless status, at risk of homelessness status and program participants' income. The Subrecipient must have policies and procedures to ensure the requirements outlined in 24 CFR §576.500 are met. In addition, sufficient records must be established and maintained for a minimum of five years after grant closeout to enable the Department and HUD to determine whether ESG requirements are met.

14. **Applicability of OMB Circulars**
    Grantees must follow the policies, guidelines and requirements established in 2 CFR Part 200.

15. **Financial Accountability 2 CFR Part 200**
    Selected awardees will be expected to have a functioning accounting system that provides for each of the following:
    - Accurate, current, and complete disclosure of the financial results of each federally sponsored project;
    - Records that identify adequately the source and Application of funds for federally sponsored activities;
    - Effective control over and accountability for all funds, property, and other assets;
    - Comparison of outlays with budget amounts;

16. **Compliance with Fair Housing and Civil Rights in ESG Programs**
    ESG Grantees must comply with all applicable fair housing and civil rights requirements in 24 CFR 5.105(a), including, but not limited to, the Fair Housing Act; Title VI of the Civil Rights Act of 1964; Section 504 of the Rehabilitation Act of 1973; Title II and Title III of the American With Disabilities Act of 1990; Executive Order 13166 – Improving Access to Persons with Limited English Proficiency, the Equal Access to Housing Rule in HUD Programs Regardless of Sexual Orientation or Gender Identity, the Architectural Act of 1968, and the Age Discrimination Act of 1975.

    a. **Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity.** On February 3, 2012 HUD revised its program regulations (77 FR 5662) to ensure that individuals and families have access to HUD assisted and insured housing programs, regardless of sexual orientation, gender identity, or marital status. Applicants are encouraged to become familiar with this rule.

Under the Equal Access Rule (24 CFR, Part 5), ESG Grantees are not allowed to limit ESG assistance to only women and children, regardless of whether the Grantee or subrecipient is a Domestic Violence or Faith-Based provider. HUD has clarified that while it is acceptable for a shelter or housing program to limit assistance to households with minor children, it may not limit assistance to only women with children. To be in compliance with the Equal Access Rule, a shelter/program serving only households with minor children must also serve the following family types, should they present: 1) single male head of household with minor child(ren); and 2) any household made up of two or more adults, regardless of sexual orientation, marital status, or gender identity, presenting with minor child(ren). ESG-funded emergency shelters serving families with children are also prohibited from denying assistance to or separating members of a family with children based on gender or age. Gender separation is only acceptable in ESG-funded single-sex shelter environments which only serve individuals.

b. **Economic Opportunities for Low and Very-Low Income and Homeless Persons (Section 3) – 24 CFR §576.407(a)**
To the extent that any housing assistance funded through this application is used for housing rehabilitation or housing construction or other public construction, then it is subject to Section 3 of the Housing and Urban Development Act of 1968, and the implementing regulations at 24 CFR Part 135.

Section 3 requires that employment, training, and contracting opportunities generated by certain HUD financial assistance for housing and community development programs shall, to the greatest extent feasible, be directed to low- and very low-income persons, particularly those who are recipients of government assistance for housing, and to businesses that provide economic opportunities for these persons.

c. **Affirmative Outreach – 24 CFR §576.407(b)**
Grantees must make known that use of the facilities, assistance, and services are available to all on a nondiscriminatory basis and must take appropriate steps to ensure effective communication with persons with disabilities. Affirmative outreach activities may include: (a) marketing programs to groups living in or receiving services in your service area that are under-represented as shown by your program data, (b) creating partnerships with community based agencies or non-profits that work with underrepresented and non-majority groups in your service area, and (c) translating documents advertising assistance, services and contact information into other languages prevalent in the community. Grantees must follow the requirements outlined in 24 CFR §576.407(b).

d. **Improving Access to Services for Persons with Limited English Proficiency (LEP) – 24 CFR §576.407(b)**
Executive Order 13166 seeks to improve access to federally assisted programs and activities for individuals who, as a result of national origin, are limited in their English proficiency. Organizations obtaining ESG funds shall take reasonable steps to ensure meaningful access to their programs and activities by individuals with limited English proficiency, regardless of the language spoken. Meaningful access may entail providing language assistance services, including oral and written translation, where necessary. Grantees must follow the requirements outlined in 24 CFR §576.407(b). HUD published Final Guidance to Federal Financial Assistance Requirements Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons in the Federal Register on January 22, 2007 (72 F.R. 2732).

e. **Violence Against Women Act 2013**
Applies for all victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation, and which must be applied consistent with all nondiscrimination and fair housing requirements. Regulations were published in the Federal Register on November 16, 2016 (81 FR 80724).

17. **Performance Measures and Standards**
In an effort to improve program outcomes, grantees should consider the evaluation of their HMIS data to determine the effectiveness of homeless services in their community. DCED requires all applicants to consider performance measurement of their ESG program and write targets for each applicable goal. Applicants must indicate how many households it projects to serve in each category in which they seek funding.

Using these goals as a framework, performance standards for ESG will be measured by the following:

- Number of households proposed to be served in each activity
- Street Outreach – Number of households reaching shelter or permanent housing and improving their income
- Shelter – Length of homelessness (less than 3 months), Number of households exiting to permanent housing, and the number of households that improve their income
- Rapid Rehousing – Number of households attaining permanent housing and remaining in unit for more than 3 months, households increasing their income, and the number connected to mainstream resources
- Homelessness Prevention – Number of households retaining permanent housing and remaining in unit for more than 3 months, households increasing their income, and the number connected to mainstream resources

*Performance will also be measured by evidence that the Grantee has coordinated with the local Continuum of Care (CoC) to ensure that ESG activities are consistent with CoC's strategies and objectives for preventing and ending homelessness. The impact of ESG funds will ultimately be reported by CoCs through Point-in-Time counts, the reduction of homelessness in a specific area, and through other data collected by HUD. In addition, grantees are to ensure coordination with other local organizations that are planning and carrying out activities related to prevention, rapid re-housing and to link participants to other mainstream resources.

F. Application Process

1. **Program Timeline**
DCED will release award information after it receives a funding award letter from HUD. Successful applicants will receive notification of award within 60 days of DCED receiving the HUD notice of award.

DCED will administer one (1) funding round for the ESG Program. The schedule below indicates the estimated application timeline.

2020 ESG Program Timeline	
February 15, 2020	Notice Published in the PA Bulletin
February 18, 2020	Application Guidelines Available and ESA open for application submission
February 27, 2020 at 10:00 a.m.	Application Webinar - register at: https://tinyurl.com/v2u7swc
April 23, 2020	Electronic Single Application Closes
Within 60 days of DCED's Award with HUD	Award Letters Issued

2. **Application Submission**
ESG guidelines and application kit will post on DCED's website effective February 18, 2020. DCED will accept applications from February 18, 2020 – April 23, 2020. Applications are accepted until 4:00pm on April 23, 2020.

The completed application and only required attachments must be submitted in DCED's Electronic Single Application. To apply, please visit www.esa.dced.state.pa.us for the log-in page of the application. If you are new to the DCED application process, you are encouraged to click the link on the left of the page that provides an "application walkthrough". If you experience difficulty submitting the application, you may click the help link above the user log-in or contact DCED's Customer Service Center for assistance. The contact information is:

Phone: 800-379-7448 (8:30AM - 5:00PM EST Monday through Friday)
or Email: ra-dcedcs@pa.gov

Do not send a hard copy of the entire application. DCED only requires a hard copy of the original resolution which should be mailed to the following address:

Pennsylvania Department of Community and Economic Development
Attn: Customer Service Center
Commonwealth Keystone Building
400 North Street, 4th Floor
Harrisburg, PA 17120-0225

If the Chief Elected Official (CEO) or Board President has a signatory designee, the official signed letter by the CEO or Board President designating the signatory must be submitted with the application.

Pennsylvania's ESG is a competitive process. DCED will review all submissions for completeness of application materials. Incomplete applications may not be considered for funding. DCED will provide an explanation for the rejection upon request. Additionally, technical assistance may be provided for future application submissions upon request.

3. **State Contact Information**
All questions related to these guidelines should be directed to:

Homelessness Program Manager
Department of Community and Economic Development
Commonwealth Keystone Building
400 North Street, 4th Floor
Harrisburg, PA 17120-0225

Phone: 717-787-5327

Additional information on the commonwealth's ESG Program can be found online at: dced.pa.gov/esg

4. **Public Participation**
The applicant must include evidence of public participation. Public participation may be documented by a citizen participation statement that includes the following:

a. A public meeting advertised on the unit of local government or non-profit organization website along with publication in the **NON-LEGAL SECTION OF A NEWSPAPER OF GENERAL CIRCULATION** giving affected residents an opportunity to discuss the program. This meeting must be separately advertised and conducted but may be held either before or after a regularly scheduled unit of local government meeting, and/or board meeting.

b. If the applicant uses social media for public participation, provide a list of where it was posted along with a copy of the statement. Posting location must be sufficient to reach all sectors of the general public.

5. **Resolution of the Municipality or Non-profit Organization**

a. The applicant must have in their application, evidence in the form of a resolution of the governing body authorizing the filing of the application.

b. The resolution must cite the HEARTH Act, state the program being applied for, and contain a provision whereby the applicant assumes responsibility for providing the local match and will reimburse the commonwealth for any expenses found to be ineligible.

A sample resolution is provided in this application.

G. Application Scoring Criteria

DCED will grant awards to applicants that define community need, whose goals are aligned with the local Continuum of Care (CoC) priorities, which practices the housing first principles, whose services aligns with the USICH goals of *Home, Together: the Federal Strategic Plan to Prevent and End Homelessness,* and targets are most appropriate for ending homelessness in Pennsylvania. DCED will provide an in-depth review of all applications for completeness, capacity, performance, and a systematic response to ending homelessness. A committee will review the assessment scores of each application and rank applicants in accordance with priorities.

SCORING CRITERIA		
Incomplete/ No Response No Points	**Acceptable Response Partial Points**	**Excellent Response Full Points**
The response is missing, incomplete, or unclear.	The response provides an answer to the question asked however, sufficient details may be lacking.	The response provides a clear, well-defined description and analysis of the question asked.

DCED will grant award amounts based on the evaluations until all grant funds are awarded. If two or more applicants have the same evaluation scores, DCED may consider the past performance of the applicant under a previous ESG award. Additionally, other factors are considered such as the proposed project and how it relates to serving the best interest of the priority of Rapid Rehousing. Applicants, who have previously returned funds, will receive a reduction of 25 points on their applications.

Section III – DCED's Funding Allocation

A. Required Expenditure Deadlines

DCED requires all grantees to invoice quarterly. DCED will routinely inspect expenditure rates to monitor timeliness.100% of the grant expenditures must be incurred within 18 months of the contract start date. Grantees will have 30 days from the end of the contract to submit all invoices to DCED. Grantees that do not meet the expenditure deadlines may have a portion or all their funds disencumbered from the contract.

Grantees must expend 100% of the grant by the end of the 18-month contract period (date to be established). ESG services are eligible for 24 months, however; applicants should design their program around the eligible grant period of eighteen (18) months.

B. Funding Recapture

Progress will be measured against goals, objectives and expenditure targets outlined by the grantee. Grantees not meeting their stated goals may have a portion or all their funding disencumbered and reallocated. These funds may be used to meet unanticipated needs such as areas experiencing significant increases in unemployment, evictions or other unforeseen economic crises. Any reallocation would be available to successful subrecipients that have a proven need and capacity to administer additional funds.

Section IV– Application Submission

Preparation of your application should begin only after you have reviewed the Program Guideline Application Kit. Questions may be directed to Homeless Program, Center for Community & Housing Development, 717-787-5327

All supplemental forms must be submitted with the application online by April 23, 2020.

APPLICANT NAME:

A. Application Contents

1. **Each application must contain the following, except where noted.** *(Please organize and label the Table of Contents and the Application Materials as indicated below)*

Attachments to include with application:

- ☐ General Application Description Form
- ☐ Match Waiver Letter,if necessary; and signed by the Chief Elected Official
- ☐ Match Commitment Letter covering the exact amount of ESG request
- ☐ Resolution of Submission by the Local Governing Body or Board President of the Applicant – send original by mail
- ☐ Signature Page – send original by mail (if applicable)
- ☐ Limited English Proficiency Guidance for ESG Applicants (DCED-CCD-010)
- ☐ Certification of Completion of a Four-Factor Analysis for Limited English Proficiency Persons and Certification of the Activities to be Included in the Language Assess Plan (DCED-CCD-011)
- ☐ Language Access Plan Certification (DCED-CCD-012)
- ☐ Management Standards (DCED-CCD-003) for applicants
- ☐ Written Standards (see Appendix B)
- ☐ Statement for Participation in Coordinated Entry
- ☐ Termination and Conflict of Interest Policies
- ☐ Statement of Need
- ☐ Housing First Statement
- ☐ Solicitation of Participants Policy
- ☐ Residency Requirement Policy
- ☐ Performance Targets
- ☐ Point-in-Time Participation Policy
- ☐ Habitability and Lead-based Inspection Form
- ☐ Timeliness Form
- ☐ Sample Subrecipient Agreement
- ☐ Coordination of Services
- ☐ Project Budget – overall for entire project

2. **Sub recipient Forms**
   (send all forms for each sub recipient)

   - ☐ Program Design (DCED-CCD-004) – only send forms applicable to the application
   - ☐ Rapid Rehousing (DCED-CCD-004)
   - ☐ Street Outreach (DCED-CCD-009)
   - ☐ Emergency Shelter Component
   - ☐ Homelessness Prevention
   - ☐ Coordination of Services (DCED-CCD-006)
   - ☐ Project Budget (DCED-CCD-008)
   - ☐ Organizational Chart
   - ☐ Sub recipient Capacity Chart and Performance Outcomes

3. **Additional Forms for Emergency Shelter Renovations or Conversions**

   - ☐ Inspection Standards Form (if applicable)
   - ☐ Deeds or Long-Term Lease – for shelter applicants
   - ☐ 3 or 10 Year Commitment Letter – for shelter applicants
   - ☐ Appraisal or Cost Level Ratio
   - ☐ Signed Current Code Inspection Report and/or Occupancy permit (No less than one year old)
   - ☐ Code Deficiency report or citation
   - ☐ Estimate of Energy Savings by Professional
   - ☐ Estimate for bathroom renovations specific to comply with Equal Access requirement

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF COMMUNITY & ECONOMIC DEVELOPMENT
CENTER FOR COMMUNITY & HOUSING DEVELOPMENT

GENERAL APPLICATION DESCRIPTION FORM

EMERGENCY SOLUTIONS GRANT PROGRAM | ALL COMPONENTS

A. APPLICANT INFORMATION

ASSISTANCE BEING REQUESTED FOR: (CHECK ALL THAT APPLY)

☐ STREET OUTREACH ☐ EMERGENCY SHELTER ☐ RAPID REHOUSING ☐ HOMELESSNESS PREVENTION

NAME OF APPLICANT (UNIT OF LOCAL GOVERNMENT (ULG):		
STREET ADDRESS:		
CITY:	STATE:	ZIP CODE:
CLASSIFICATION: ☐ CITY ☐ BOROUGH ☐ COUNTY ☐ TOWNSHIP ☐ NON-PROFIT	IS THE APPLICANT AN ESG DIRECT ENTITLEMENT COMMUNITY? ☐ YES ☐ NO	
CHIEF ELECTED OFFICIAL:		
APPLICANT'S FEIN #:	DUNS#:	SAMS (DATE OF EXPIRATION):
AGENCY OR ORGANIZATION ADMINISTERING ESG PROGRAM:		
ADDRESS OF ADMINISTRATING AGENCY:		
CITY:	STATE:	ZIP CODE:
CONTACT PERSON WITH TITLE:		
ADDRESS OF CONTACT PERSON:		
CITY:	STATE:	ZIP CODE:
CONTACT EMAIL:	CONTACT TELEPHONE:	CONTACT FAX:

B. CONTINUUM OF CARE INFORMATION

NAME OF LOCAL CONTINUUM OF CARE:	
CONTACT PERSON FOR CONTINUUM OF CARE:	
TELEPHONE NUMBER:	EMAIL:

C. HMIS INFORMATION

CONTACT PERSON FOR HMIS:	
TELEPHONE NUMBER:	EMAIL:

Resolution of the Municipality

Resolution of the _____

Authorizing the filing of a proposal for funds with the

Department of Community and Economic Development,

Commonwealth of Pennsylvania.

WHEREAS, the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH) enacted into law on May 20, 2009, authorized the Emergency Solutions Grant (ESG) Program; and

WHEREAS, the Commonwealth of Pennsylvania through the Department of Community and Economic Development (DCED) has received ESG program funds and is making these funds available to units of local governments for eligible homeless services; and

WHEREAS, the _____ desires to submit an application to DCED for ESG Program funds to provide homeless services or on behalf of other entities to provide homeless services.

NOW, THEREFORE BE IT RESOLVED AND IT IS HEREBY RESOLVED by the _____ that:

1. The proposed project(s)_____ to be funded by a grant from the Pennsylvania ESG Program meet the ESG interim rule requirements at §24 CFR 576 are eligible and approved.
2. The _____ on behalf of_____ is authorized and directed to execute an ESG Program application in the amount of $_____ to the PA Department of Community and Economic Development.
3. The _____ will assume the responsibility for securing the required matching amount of project funds or request a waiver of match funds to DCED.
4. The (County) will reimburse the commonwealth for any expenditure found to be ineligible.
5. The _____ is authorized to provide such assurances, certificates, and supplemental data or revised data that DCED may request in connection with the application.

Adopted this _____day of _____, _____.
(ATTEST) (SEAL)

_____
SECRETARY

Resolution of the Non-Profit Organization

Resolution of the _____

Authorizing the filing of a proposal for funds with the

Department of Community and Economic Development,

Commonwealth of Pennsylvania.

WHEREAS, the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH) enacted into law on May 20, 2009, authorized the Emergency Solutions Grant (ESG) Program; and

WHEREAS, the Commonwealth of Pennsylvania through the Department of Community and Economic Development (DCED) has received ESG program funds and is making these funds available to non-profit organizations for eligible homeless services; and

WHEREAS, the _____ desires to submit an application to DCED for ESG Program funds to provide homeless services or on behalf of other entities to provide homeless services.

NOW, THEREFORE BE IT RESOLVED AND IT IS HEREBY RESOLVED by the _____ that:
(board)

1. The proposed project(s)_____ to be funded by a grant from the Pennsylvania ESG Program meet the ESG interim rule requirements at §24 CFR 576 are eligible and approved.
2. The _____ on behalf of_____ is authorized and directed to execute an ESG Program application in the amount of $_____ to the PA Department of Community and Economic Development.
3. The _____ will assume the responsibility for securing the required matching amount of project funds or request a waiver of match funds to DCED.
4. The _____ will reimburse the commonwealth for any expenditure found to be ineligible.
   (organization)
5. The _____ is authorized to provide such assurances, certificates, and supplemental data or revised data that DCED may request in connection with the application.

Adopted this _____day of _____, _____.
(Notarized)

_____
Board President

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF COMMUNITY & ECONOMIC DEVELOPMENT
CENTER FOR COMMUNITY & HOUSING DEVELOPMENT

LIMITED ENGLISH PROFICIENCY GUIDANCE FOR ESG APPLICANTS

In Compliance with:

Section 601 of Title VI the Civil Rights Act of 1964 (LEP Statutory Authority)
"No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

And

Executive Order 13166 (Issued in the Federal Register 65 FR 50121 on August 16, 2000)
Mandates improved access to federally assisted programs and activities for individuals who, as a result of national origin, are limited in their English proficiency.

Grantees are required to make reasonable efforts to provide language assistance to ensure meaningful access for LEP persons to the contractor's programs and activities that has any federal financial assistance.

DCED is providing this guide to its grantees of federal financial assistance to aid in the analysis of determining if the beneficiaries of the proposed projects have limited English proficiency. Please use the following template to document your analysis of your program or activity and to determine if the certification can be signed by the grantee as not having an affected population or if a Language Access Plan is required. *DCED will provide additional guidance if necessary.*

For Direct HUD Entitlement Communities under the Community Development Block Grant Program applying for Pennsylvania funding under the Emergency Solutions Grant:

If your county or municipality is a direct recipient of federal CDBG funding from HUD (**Not** Pennsylvania), then they must be in compliance with the Limited English Proficiency Regulations. DCED is not requiring you, the grantee for the ESG program, to complete a second set of documents for your application. In order to not have to complete the following LEP compliance exercise for your application, **you must submit** the Four Factor Analysis and/or Language Access Plan currently in place for the LEP requirement in your county/municipality along with the following certificate signed by the Chief Elected Official. If the grantee **does not** have these documents, then they must complete and submit the attached guidance with their application;

> **Certification:** As a Direct Entitlement for HUD federal financial assistance for the CDBG program, the Grantee has completed the required Four Factor Analysis and if required, has adopted a Language Access Plan. The Grantee is in compliance with the LEP regulations and makes all reasonable attempts to accommodate language access needs of residents during citizen participation, income surveys and/or direct assistance intake activities including but not inclusive of public hearings, public notices, advertisements, income surveys and direct assistance intake documents.

_____ _____
Chief Elected Official *(signature and printed)* **Date**

_____ _____
Attest **Grantee Name & Program**

For Pennsylvania Entitlement Communities under the Community Development Block Grant Program applying for funding under the ESG Grant:

If your county or municipality is a recipient of federal CDBG funding from Pennsylvania, then they must be in compliance with the Limited English Proficiency Regulations. DCED is not requiring you, the grantee for the ESG program, to complete a second set of documents for your application. In order to not have to complete the following LEP compliance exercise for your application, **you must submit** the Four Factor Analysis and/or Language Access Plan currently in place for the LEP requirement in your county/municipality along with the following certificate signed by the Chief Elected Official. If the grantee **does not** have these documents, then they must complete and submit the attached guidance with their application;

> **Certification:** As a Pennsylvania CDBG Entitlement for federal financial assistance for the CDBG program, the Grantee has completed the required Four Factor Analysis and if required, has adopted a Language Access Plan. The Grantee is in compliance with the LEP regulations and makes all reasonable attempts to accommodate language access needs of residents during citizen participation, income surveys and/or direct assistance intake activities including but not inclusive of public hearings, public notices, advertisements, income surveys and direct assistance intake documents.

_____ _____

Chief Elected Official *(signature and printed)* **Date**

_____ _____

Attest **Grantee Name & Program**

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF COMMUNITY & ECONOMIC DEVELOPMENT
CENTER FOR COMMUNITY & HOUSING DEVELOPMENT

CERTIFICATION OF COMPLETION
OF A FOUR-FACTOR ANALYSIS FOR LIMITED ENGLISH PROFICIENCY PERSONS
AND
CERTIFICATION OF THE ACTIVITIES
TO BE INCLUDED IN THE LANGUAGE ACCESS PLAN

EMERGENCY SOLUTIONS GRANT PROGRAM

FOR:	
GRANTEE NAME:	
PROGRAM AND CONTRACT NUMBER (ESG/C000045678):	
CONTACT PERSON:	
CONTACT PERSON TELEPHONE NUMBER:	CONTACT PERSON EMAIL:

Purpose
In compliance with Section 601 of Title VI the Civil Rights Act of 1964 (LEP Statutory Authority) and Executive Order 13166, _____ (Grantee) has conducted the following Four Factor Analysis for Limited English Proficiency (LEP) persons for the federally funded program listed above.

History
Title VI of the Civil Rights Act of 1964, is the federal law which protects individuals from discrimination on the basis of their race, color, or national origin in programs that receive federal financial assistance. In certain situations, failure to ensure that persons who have limited English proficiency can effectively participate in, or benefit from, federally assisted programs may violate Title VI's prohibition against national origin discrimination. Persons who, as a result of national origin, do not speak English as their primary language and who have limited ability to speak, read, write, or understand English may be entitled to language assistance under Title VI in order to receive a particular service, benefit, or encounter.

Executive Order 13166 (Issued in the Federal Register 65 FR 50121 on August 16, 2000) mandates improved access to federally assisted programs and activities for individuals who, as a result of national origin, are limited in their English proficiency. The order also requires a Language Access Plan for the program or activity if a qualifying population is determined. To determine if there is an affected population of beneficiaries having limited English proficiency, all grantees receiving federal financial assistance must conduct the four-factor analysis as outlined below.

Grantee Four-Factor Analysis
The following Four-Factor Analysis serves as the guide for determining which language assistance measures the Grantee will be required to undertake to guarantee access to Grantee's Emergency Solutions Grant (ESG) programs by LEP persons.

FACTOR ONE: Methodology

The grantee must analyze the number or proportion of LEP persons served or encountered in the eligible service area population (served or encountered includes those persons who would be served by the program or activity if the person received education and outreach and the grantee provided sufficient language services).

Select the paragraph(s) below that best describes your methodology for the analysis by placing a check mark in the box beside the description. Also please fill in the blanks or circle the correct statement were indicated. These paragraphs may be modified or replaced with narrative that more accurately reflects the grantee's methodology.

☐ The Grantee utilized the PA Census tabulation for persons that speak English "Less than Well" provided by DCED to determine the **county's** LEP population(s). Based on this data, the Grantee **CHOOSE ONE** *(chose one)* meet the 1,000 or 5% LEP persons threshold for any language(s) identified.

☐ The Grantee utilized the PA Census tabulation for persons that speak English "Less than Well" provided by DCED to determine its **municipalities'** LEP population(s). Based on this data, the Grantee **CHOOSE ONE** *(chose one)* have any municipalities within its borders that meet the 1,000 or 5% LEP persons threshold for any language(s) identified.

☐ Local elected officials, clergy, medical personnel, and school administrators were polled by telephone/questionnaire to request input regarding their knowledge of LEP persons within the community and/or proposed project area(s). Based on the results of the telephone poll/questionnaires, there are an _____ *(estimated number)* LEP persons out of _____ *(total persons benefitting from the program or activity)* located in _____ *(Grantee or service area name)*. This **CHOOSE ONE** *(chose one)* meet the 1,000 or 5% LEP persons of total service area threshold for any language(s) identified.

Please list below all municipalities and/ or service areas under this program that qualify as meeting the threshold of 1,000 or 5% LEP person's threshold for any language(s) identified as indicated by the methodology used above. Include the name of the municipality/service area, the language(s) identified, and the number or percentage of persons. For example:

Apple Township	*Germanic*	*16%*

If any of the blocks above contains a "does" meet the 1,000 or 5% LEP person threshold for any language(s) identified, the grantee must complete a Language Access Plan for that municipality and may stop further completion of this Four Factor Analysis. *Please proceed to the Language Access Plan Certification on page 38 of this guidance. Please submit this page, along with the Language Access Plan Certification with your application.*

If the grantee, after completing this section of the analysis, has all blocks above marked with "does not" meet the 1,000 or 5% LEP persons threshold for any languages identified, they must continue analyzing their program or activity with the following questions.

Additional Questions to be Answered:

FACTOR TWO: The frequency with which LEP persons come into contact with the program or activity

Select the paragraph below that best describes the amount of public contact of your program by placing a check mark in the box beside the description. These paragraphs may be modified or replaced with narrative that more accurately reflects the grantee's program or activity.

☐ The proposed project does include rapid rehousing, homelessness prevention, street outreach, essential services, and/or other direct assistance activities. Therefore, residents are likely to have considerable direct contact with the program and its staff.

☐ The proposed project is a shelter rehabilitation and/or shelter operations activity **only** that does not provide direct assistance to individuals. As a result, LEP persons rarely come into contact with the ESG program personnel or intake process. However, all citizen participation activities are open to the general public and will follow the grantee's Language Access Plan if necessary.

If the first block above is marked, the grantee must complete a Language Access Plan for the program and may stop further completion of this Four Factor Analysis. *Please proceed to the Language Access Plan Certification on page 38 of this guidance. Please submit all pages, along with the Language Access Plan Certification with your application.*

If the second block is marked, the grantee must continue on with their analysis of their program or activity.

FACTOR THREE: The nature and importance of the program, activity, or service provided by the program or activity

The nature and importance of all ESG activities to the LEP population is high. Even if the grantee does not have a LEP population identified in the first section of this analysis, homeless or near homeless persons having limited English proficiency may find themselves in need of the assistance provided with the ESG funds. As many of the applicants for assistance may be from other areas of the state or even the country, the grantee has no prior knowledge of the needs of persons presenting themselves for assistance. Therefore, LEP measures are necessary to be followed by the grantee to be in compliance. **All ESG grantees must complete a Language Access Plan Certificate** and should not complete this Four Factor Analysis.

FACTOR FOUR: The resources available and costs to the recipient

Currently, internet sites can be utilized to translate some written materials. Additionally, local volunteers have been identified to provide oral translation services at public meetings and during conversations with LEP residents during the implementation of the proposed project. Furthermore, many of the common forms used in the implementation of an ESG program or activity are available in multiple languages on the HUD and DOL websites. Additionally, translation activities are an eligible ESG administrative or delivery expense. Therefore, limited LEP measures are reasonable given the resources available to Grantee. So grantees may not use this factor as the only factor determining the need for a Language Access Plan.

As all ESG programs and activities meet the LEP Factor of the nature and importance, all applicants must complete the following Language Access Plan Certificate and have a Language Access Plan in their Program Master Files.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF COMMUNITY & ECONOMIC DEVELOPMENT
CENTER FOR COMMUNITY & HOUSING DEVELOPMENT

LANGUAGE ACCESS PLAN CERTIFICATION

Certification for *(Grantee, Program or Activity)*: _____

As a result of the preceding Four-Factor Analysis, _____ (Grantee) has identified the following types of language assistance to be provided on an as needed basis by the Grantee throughout the implementation of its ESG program:

Below are the minimum requirements to meet the needs of your identified Limited English Proficiency Populations. Those marked "Required" are mandatory of all ESG grantees. *Additional activities may be added to meet the needs of the grantees' LEP population(s).*

All ESG citizen participation materials, public notices, and project-related resolutions, will be published/posted in the LEP language(s) identified, in community newsletters, on bulletin boards at the offices and meeting location of the grantee, on the grantee website and in public places throughout the proposed project area(s) and/or the community, especially those areas with high concentration of the affected population. ***Required***

Additionally, all published/posted citizen participation notices will include a statement in the identified LEP language(s) indicating that other "program materials are available in the LEP language(s) upon request". This statement must be in as many languages as has been identified during the grantee's analysis. ***Required***

All citizen participation notices will include a statement that "translators will be available at public meetings upon at least 72 hours' notice". This statement will be in the identified LEP language(s) in the English notification and also in the complete LEP language(s)' notification. ***Required***

All direct assistance program application documents and outreach materials will be provided in the LEP language(s) identified. ***Required***

For direct assistance intakes, if needed, a translator will be retained to provide oral translation at the site of the intake to assist in filling out the intake documents and explaining the program. The grantee may not require the LEP applicant to provide their own translator, though the applicant may bring someone if they choose. ***Required***

If other populations of LEP persons are identified in the future, Grantee will provide additional measures to serve the language access needs of those persons. ***Required***

The Grantee will complete a Language Access Plan which delineates how these activities will be carried out, by whom, and who will monitor the effectiveness of the activities for possible revision. This Plan once adopted by the grantee must be retain in the grantees' master file and utilized throughout the program.

Adopted:

_____ _____
Chief Elected Official *(Signature and Printed Name)* **Date**

_____ _____
Attest *(Name and Title)* **Grantee Name & Program**

MANAGEMENT STANDARDS

EMERGENCY SOLUTIONS GRANT PROGRAM | ALL COMPONENTS

APPLICANT NAME & DATE:

Please answer the following in as much detail as necessary.
Additional pages may be added and inserted behind this page.

A. Capacity and Experience Related to Proposed Activity(s)

Describe the applicant's experience and capacity to administer homelessness programs by completing the project/program experience tables. Describe specific types of programs/services/activities/projects the applicant administers or provides that are relevant to the objectives of the ESG Program. Be sure to provide sufficient details.

PROJECT/PROGRAM EXPERIENCE TABLES		
PROGRAM NAME:	ACTIVITY/PROGRAM TYPE:	SOURCE OF FUNDS:
PROGRAM LOCATION:	START-COMPLETION DATES & STATUS:	TOTAL PROJECT COSTS:
PROGRAM DESCRIPTION: *(Scope & complexity, significant accomplishments, issues or experience, etc.)*		
PROGRAM REFERENCE: (*Contact Name, Phone & Email)*		

PROGRAM NAME:	ACTIVITY/PROGRAM TYPE:	SOURCE OF FUNDS:
PROGRAM LOCATION:	START-COMPLETION DATES & STATUS:	TOTAL PROJECT COSTS:
PROGRAM DESCRIPTION: *(Scope & complexity, significant accomplishments, issues or experience, etc.)*		
PROGRAM REFERENCE: (*Contact Name, Phone & Email)*		

B. List current staff positions and qualifications of individuals who will carry out the grant or project activities. If using agencies or third party contractors, provide the staff positions and qualifications for each, with the name of the agency clearly marked. Add additional rows as necessary. Positions must include the staff responsible for rental agreements, subrecipient agreements, environmental review, monitoring of subrecipients, invoicing, habitability and lead-based paint inspections, case-management, and reporting to DCED.

Department/Agency/or Subrecipient	Position	Program Related Duties	Years Current Employee Conducting Duties	Approximate Hours per Week Completing Duties for the Program
Example: XYZ County	*Planner*	*Application Prep, Environmental Reviews, Closeouts*	*12 Years*	*10 hrs.*

C. If the applicant is applying to administer rental assistance, describe your experience in inspecting housing units for both habitability and lead based paint compliance.

D. Complete the following chart dealing with the performance measures for the applicant's most recent funded Emergency Solutions Grant.

Performance Outcomes	2017 ESG	2018 ESG	2019 ESG (to date)
Number of Households Served in all activities			
Street Outreach – Number of households reaching shelter or permanent housing			
Shelter – Number of households entering a Rapid Rehousing Program			
Shelter – Number of households attaining permanent housing and remaining in unit for more than 3 months			
Rapid Rehousing – Number of households attaining permanent housing and remaining in unit for more than 3 months			
Homelessness Prevention – Number of households retaining permanent housing and remaining in unit for more than 3 months			
Mainstream Resources – Number of households utilizing additional resources to assist needs			

Performance Targets	Target Numbers
Total Number of Households Served in all Activities	
Street Outreach – Number of households obtaining shelter or permanent housing stability and improving their income	
Shelter – Length of homelessness (less than 3 months), Number of households entering a Rapid Rehousing Program and the number of households improving their income	
Rapid Rehousing – Number of households attaining permanent housing and remaining in unit for more than 3 months, households increasing their income, and the number connected to mainstream resources	
Homelessness Prevention – Number of households retaining permanent housing and remaining in unit for more than 3 months, households increasing their income, and the number connected to mainstream resources	

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF COMMUNITY & ECONOMIC DEVELOPMENT
CENTER FOR COMMUNITY & HOUSING DEVELOPMENT

TIMELINESS

EMERGENCY SOLUTIONS GRANT PROGRAM

All Components

APPLICANT NAME & DATE:

Please answer the following in as much detail as necessary.
Additional pages may be added and inserted behind this page.

1. What system or processes do you have in place to quickly move or stabilize participants in permanent housing?

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF COMMUNITY & ECONOMIC DEVELOPMENT
CENTER FOR COMMUNITY & HOUSING DEVELOPMENT

COORDINATION OF SERVICES

EMERGENCY SOLUTIONS GRANT PROGRAM

All Components

APPLICANT NAME & DATE:

1. List partner agencies or third party contractors you plan to partner with or fund under this application and describe the roles, experience and capacity of each (third party contractors, case managers, shelters, property owners, etc.) to efficiently and effectively deliver ESG funded programs and services. *Attach a sample Agreement and/or Contract.*

Agencies and /or Third-Party Contractors to be Used		
Name of Organization	**Contact Person**	**Service/Benefit(s) Provided**

2. Describe how you will coordinate the ESG Program to link program participants with other services available in your community (linking participants to homeless services and mainstream resources).

Homeless Services and Mainstream Linkages	
Name of Organization	**Service/Benefit(s) Provided**

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF COMMUNITY & ECONOMIC DEVELOPMENT
CENTER FOR COMMUNITY & HOUSING DEVELOPMENT

PROJECT BUDGET

EMERGENCY SOLUTIONS GRANT PROGRAM

All Components

INSTRUCTIONS: Complete this form for each project being submitted and one for the cumulative project.

DATE:	☐ Original ☐ Revision
APPLICANT	
PROJECT NAME:	

Activity	DCED Request	Match Budget	Match Source	Total Project
Rapid Rehousing	0	0		0
Financial Assistance				0
Services				0
Rental Assistance				0
Street Outreach	0	0		0
Case Management				0
Essential Services				0
Homelessness Prevention	0	0		0
Financial Assistance				0
Services				0
Rental Assistance				0
Emergency Shelter	0	0		0
Renovations				0
Operations				0
Essential Services				0
HMIS Component				0
Administration Component				0
TOTAL	$ 0	$ 0	$	$ 0

Local Match must identify the source of the match. Donations must include source, (ie; Golf Tournament, Giant Food Stores, Souper Sunday) You may put this on another piece of paper behind the budget.

List the amount you applied for under the match waiver, if applicable.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF COMMUNITY & ECONOMIC DEVELOPMENT
CENTER FOR COMMUNITY & HOUSING DEVELOPMENT

PROGRAM DESIGN

EMERGENCY SOLUTIONS GRANT PROGRAM

Rapid Rehousing

APPLICANT NAME & DATE:

Please answer the following in as much detail as necessary. Additional pages may be added and inserted behind this page to respond to rapid rehousing questions. One Program Design form should be completed for each subrecipient/shelter/agency to receive assistance.

PROJECT/PROGRAM INFORMATION

PROJECT/PROGRAM MANAGER'S NAME:		
PROJECT/PROGRAM MANAGER'S ORGANIZATION:		
STREET ADDRESS:		
CITY:	STATE:	ZIP CODE:
PROJECT/PROGRAM MANAGER PHONE:	PROJECT/PROGRAM MANAGER EMAIL:	PROJECT/PROGRAM MANAGER FAX:

RAPID REHOUSING QUESTIONS

1. Describe your project. What is your target population(s) and how does the program meet the needs of your local community in accordance with your CoC's Strategic Plan? How many households do you plan to serve during the contract period?
2. Describe how you will determine the amount of assistance provided to each household (short-term or medium-term assistance).
3. What is your strategy to remove barriers and implement the Housing First model?
4. Describe how your case managers are working with program participants to develop a housing-oriented goal plan to obtain housing stabilization. How is it determined when a family reaches stabilization?
5. Under what circumstances would you provide a reevaluation of a participant prior to the 12-month requirement established by HUD?
6. What barriers exist, either programmatic or administrative, that would prevent your agency from providing stabilization services to ensure permanent housing for all homeless persons?
7. Describe your strategy for soliciting participants to the program?
8. How will your agency comply with the Equal Access Rule and the Prohibition against Involuntary Separation?
9. Explain how your agency participates in your local CoC's Coordinated Entry System as required by HUD?
10. Are you providing services directly or subcontracting the services to another provider?
11. What is your process for linking program participants with the mainstream resources in your community?
12. Describe the process for determining program eligibility to receive Rapid Rehousing services.
13. How does your agency ensure you are not providing more than 24 months of assistance within a three year period?
14. Does your agency have the capacity to begin providing services immediately? How is that determined?
15. How will the grantee monitor the program for compliance?

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF COMMUNITY & ECONOMIC DEVELOPMENT
CENTER FOR COMMUNITY & HOUSING DEVELOPMENT

PROGRAM DESIGN

EMERGENCY SOLUTIONS GRANT PROGRAM

Street Outreach

APPLICANT NAME & DATE:

Please answer the following in as much detail as necessary. Additional pages may be added and inserted behind this page to respond to street outreach questions. One Program Design form should be completed for each shelter/agency to receive assistance.

PROJECT/PROGRAM INFORMATION

PROJECT/PROGRAM MANAGER'S NAME:		
PROJECT/PROGRAM MANAGER'S ORGANIZATION:		
STREET ADDRESS:		
CITY:	STATE:	ZIP CODE:
PROJECT/PROGRAM MANAGER PHONE:	PROJECT/PROGRAM MANAGER EMAIL:	PROJECT/PROGRAM MANAGER FAX:

STREET OUTREACH QUESTIONS

1. Describe in detail the specific services to be provided: i.e. engagement, case-management, emergency health services, emergency mental health services, transportation, or services for special populations. (Please refer to 24 CFR, 576.101(a).
2. Provide a narrative that supports your request for funding.
   a. Describe in detail why your community has a need for street outreach services.
   b. How does your agency participate in the Point in Time (PIT) count? Include Point in Time count data for your county to support your request.
3. List objectives, outcomes, and performance indicators.
4. How does your program coordinate with other community service providers?
5. Describe how you are utilizing the Continuum of Care's Coordinated Entry System for Street Outreach Program Participants?
6. How does your program determine and document eligibility for services?
7. List program limitations and special programmatic requirements for a person to receive assistance. i.e. residency requirement
8. How does your agency participate in HMIS, ETO, or a comparable database?
9. Does your program have the capacity to begin immediately? Please explain.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF COMMUNITY & ECONOMIC DEVELOPMENT
CENTER FOR COMMUNITY & HOUSING EVELOPMENT

PROGRAM DESIGN

EMERGENCY SOLUTIONS GRANT PROGRAM

Homelessness Prevention

APPLICANT NAME & DATE:

Please answer the following in as much detail as necessary. Additional pages may be added and inserted behind this page to respond to homeless prevention questions. One Program Design form should be completed for each shelter/agency to receive assistance.

PROJECT/PROGRAM INFORMATION

PROJECT/PROGRAM MANAGER'S NAME:		
PROJECT/PROGRAM MANAGER'S ORGANIZATION:		
STREET ADDRESS:		
CITY:	STATE:	ZIP CODE:
PROJECT/PROGRAM MANAGER PHONE:	PROJECT/PROGRAM MANAGER EMAIL:	PROJECT/PROGRAM MANAGER FAX:

HOMELESSNESS PREVENTION QUESTIONS

1. Describe your project. What is your target population(s) and how does the program meet the needs of your local community in accordance with your CoC's Strategic Plan? How many households do you plan to serve during the contract period?
2. Describe how your will determine the amount of assistance provided to each at-risk of homelessness household (short-term or medium-term assistance)?
3. What is your strategy to remove barriers and implement the Housing First model?
4. Describe how your agencies case managers are working with program participants to develop a housing-oriented goal plan to obtain housing stabilization. How is it determined when a household reaches stabilization?
5. Under what circumstances would you provide a reevaluation of a participant prior to the 3month requirement established by HUD?
6. What barriers exist, either programmatic or administrative, that would prevent your agency from providing stabilization services to ensure permanent housing for all homeless persons?
7. Describe your strategy for soliciting participants to the program?
8. Explain how your agency participates in your local CoC's Coordinated Entry System as required by HUD?
9. Are you providing services directly or subcontracting the services to another provider?
10. What is your process for linking program participants with the mainstream resources in your community?
11. Describe the process for determining program eligibility to receive Homelessness Prevention services?
12. How does your agency ensure you are not providing more than 24 months of assistance within a three year period?
13. Does your agency have the capacity to begin providing services immediately? How is that determined?

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF COMMUNITY & ECONOMIC DEVELOPMENT
CENTER FOR COMMUNITY & HOUSING DEVELOPMENT

PROGRAM DESIGN

EMERGENCY SOLUTIONS GRANT PROGRAM

Emergency Shelter

APPLICANT NAME & DATE:

Please answer the following in as much detail as necessary. Additional pages may be added and inserted behind this page to respond to emergency shelter questions. One Program Design form should be completed for each shelter/agency to receive assistance.

PROJECT/PROGRAM INFORMATION

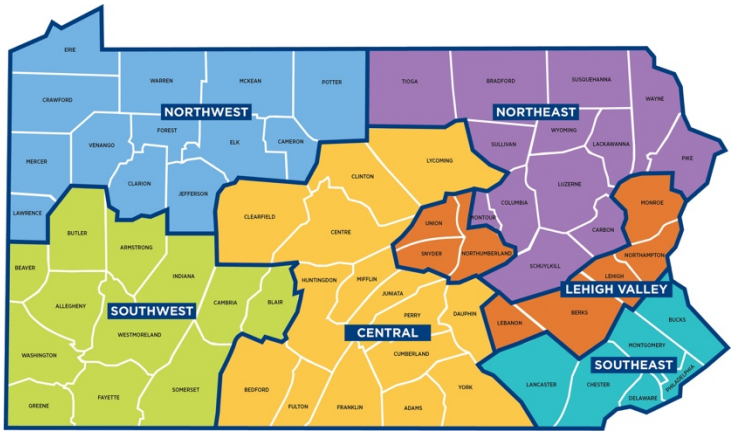
PROJECT/PROGRAM MANAGER'S NAME:		
PROJECT/PROGRAM MANAGER'S ORGANIZATION:		
STREET ADDRESS:		
CITY:	STATE:	ZIP CODE:
PROJECT/PROGRAM MANAGER PHONE:	PROJECT/PROGRAM MANAGER EMAIL:	PROJECT/PROGRAM MANAGER FAX:

EMERGENCY SHELTER QUESTIONS

1. Describe in detail the emergency shelter service(s) your agency intends to provide with the grant: Renovations, Operations, and/or Essential Services? For each service provided, include a detailed description on why those services are needed in your community and how that need was determined, the target population, etc. For renovation requests, does the project address code deficiencies, health and safety violations, ADA compliance, increase bed capacity, energy conservation, or bathroom renovations to comply with Equal Access requirements?
2. How does your agency participate in the Point in Time (PIT) Count? Provide factual Point in Time (PIT) Count data to support your request.
3. How does your Emergency Shelter request align with your CoC's Strategic Plan?
4. List objectives, outcomes, and performance indicators projected for success.
5. How does your program coordinate with other community service providers?
6. Describe how you are utilizing the Continuum of Care's Coordinated Entry System for your program.
7. How does your program determine and document eligibility for services?
8. Describe how the project will serve individuals with American's with Disability Act (ADA) needs?
9. List program limitations and special programmatic requirements for a person to receive assistance. i.e. residency requirement, single sex shelter, does not serve families.
10. How does your program move individuals and families from emergency shelter to permanent housing?
11. For agencies providing essential services, describe your case-management program in detail.
12. Does your agency participate in HMIS, ETO, or a comparable database?
13. Does your program have the capacity to begin immediately? Please explain.
14. How will your agency comply with Equal Access Rule and the Prohibition Against Involuntary Separation?

Regional Offices

Pennsylvania Department of Community and Economic Development
dced.pa.gov



Southeast
Bucks, Chester, Delaware, Lancaster, Montgomery and Philadelphia counties

Department of Community
and Economic Development
Aliyah Stanger, Director
110 North 8th Street, Suite 505
Philadelphia, PA 19107-2471
(215) 560-5830
Fax: (215) 560-5832
astanger@pa.gov

Northeast
Bradford, Carbon, Columbia, Lackawanna, Luzerne, Montour, Pike, Schuylkill, Sullivan, Susquehanna, Tioga, Wayne and Wyoming counties

Department of Community
and Economic Development
Paul Macknosky
2 North Main Street
Pittston, PA 18640
(570) 963-4122
Fax: (570) 654-6315
pmacknosky@pa.gov

Lehigh Valley
Berks, Lehigh, Monroe, Lebanon, Northampton, Northumberland, Snyder, and Union counties

Department of Community
and Economic Development
Fadia Halma, Director
400 North Street, 4th Floor
Commonwealth Keystone Building
Harrisburg, PA 17120-0225
(717) 877-8481
fhalma@pa.gov

Central
Adams, Bedford, Centre, Clearfield, Clinton, Cumberland, Dauphin, Franklin, Fulton, Huntingdon, Juniata, Lycoming, Mifflin, Perry, and York counties

Department of Community
and Economic Development
Marita Kelley, Director
400 North Street, 4th Floor
Commonwealth Keystone Building
Harrisburg, PA 17120-0225
(717) 720-7301
Fax (717) 783-4663
markelley@pa.gov

Southwest
Allegheny, Armstrong, Beaver, Blair, Butler, Cambria, Fayette, Greene, Indiana, Somerset, Washington, and Westmoreland counties

Department of Community
and Economic Development
Johnna Pro, Director
301 Fifth Avenue, Suite 250
Pittsburgh, PA 15222
(412) 565-5098
Fax: (412) 565-2635
jopro@pa.gov

Northwest
Cameron, Clarion, Crawford, Elk, Erie, Forest, Jefferson, Lawrence, McKean, Mercer, Potter, Venango, and Warren counties

Department of Community
and Economic Development
Kim Thomas, Director
100 State Street, Suite 205
Erie, PA 16507
(814) 871-4245
Fax: (814) 454-7494
kimbethoma@pa.gov

Appendix A – FY 2019 ESG Direct Entitlement Areas

NAME	STATE	ESG19-Total
Allentown	PA	$194,268
Erie	PA	$261,906
Harrisburg	PA	$166,243
Lancaster City	PA	$142,487
Philadelphia	PA	$3,611,900
Pittsburgh	PA	$1,180,626
Reading	PA	$220,956
Scranton	PA	$229,061
Allegheny County	PA	$1,164,791
Beaver County	PA	$274,427
Berks County	PA	$194,532
Bucks County	PA	$175,338
Chester County	PA	$217,335
Delaware County	PA	$306,369
Lancaster County	PA	$242,965
Luzerne County	PA	$351,752
Montgomery County	PA	$277,241
Washington County	PA	$295,062
Westmoreland County	PA	$289,330
York County	PA	$183,182

Appendix B – 2020 Emergency Solutions Grant Application Written Standards List

Grantees must provide a copy of their written standards for ESG or the standards of the local Continuum of Care that specifically outlines how all ESG funds must be administered. The standards must be effective for ensuring individuals and families applying for and receiving assistance, are able to gain or re-gain long-term housing stability and avoid relapses in homelessness. The standards will include the following all items listed below. The standards will include the following:

- ☐ Policy for Evaluating Eligibility
- ☐ Standards for Targeting
- ☐ Policy for Admissions
- ☐ Emergency Shelter Essential Services Prioritization Policy
- ☐ Coordination Policy
- ☐ Rapid Rehousing/Homelessness Prevention Prioritization Policy
- ☐ Standards for Participant Rent Responsibility
- ☐ Standards for Length of Time for Rental Assistance
- ☐ Standards for Housing Stabilization and/or Relocation
- ☐ Utilization of Limited English Proficiency

Appendix C

Website and Best Practice References

- **Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH ACT)**
  www.hudexchange.info/resource/1717/s-896-hearth-act/
- **Interim ESG Regulations: 24 CFR Part 576**
  www.hudexchange.info/resource/1927/hearth-esg-program-and-consolidated-plan-conforming-amendments/
- **HEARTH Homeless Definition Final Rule: 24 CFR Parts 91, 582 and 583**
  hudexchange.info/resource/1928/hearth-defining-homeless-final-rule/
- **PA East and West Balance of State Continuum of Care Website**
  www.pennsylvaniacoc.org
- **Department of Community & Economic Development Website**
  dced.pa.gov

Best Practices Resources

- **Solutions and Best Practices to Ending Homelessness**
  www.endhomelessness.org/pages/solutions
- **The Solutions Database**
  www.usich.gov/solutions
- **Federal Strategic Plan to Prevent and End Homelessness**
  www.usich.gov/tools-for-action/opening-doors/
- **What Gets Measured, Gets Done: A Toolkit on Performance Measurement for Ending Homelessness**
  https://endhomelessness.org/resource/a-toolkit-on-performance-measurement/what-gets-measured-what-gets-done/