



**NEW CASTLE COUNTY
DEPARTMENT OF COMMUNITY SERVICES
COMMUNITY DEVELOPMENT AND HOUSING DIVISION**

EMERGENCY SOLUTIONS GRANT PROGRAM

POLICY MANUAL FOR FUNDING APPLICATION

Deadline for Applications

Date: December 11, 2017

Time: 4:00 p.m. (No Exceptions)

**Only COMPLETED Applications will be accepted.
Please use Checklist provided on page #32 to ensure completion.**

Please forward ten (10) completed applications to:

Nicole Waters
Department of Community Services
Community Development and Housing Division
New Castle County
77 Reads Way
New Castle, DE 19720
(302) 395-5644
nwaters@nccde.org

New Castle County
Department of Community Services
Community Development and Housing Division
77 Reads Way
New Castle, DE 19720
(302) 395-5600
www.nccde.org/housing

Introduction

The Emergency Solutions Grants Program (ESG) is authorized by the Homeless Emergency and Rapid Transition to Housing Act of 2009 (HEARTH Act). This manual of policy and procedure reflects both the Federal regulations of the HEARTH Act that governs the ESG, and the procedures used by the New Castle County (NCC) in administration of this grant as directed by the U.S. Department of Housing and Urban Development (HUD). In addition, standards for financial management and internal controls are reflected in the Uniform Grant Guidance (UGG), which supersedes OMB Circulars A-21, A-87, A-110, and A-122. The streamlined guidance can be found in the Code of Federal Regulations (CFR), 2 CFR 200. NCC is also responsible for the environmental regulations of 24 CFR Part 58. These Federal laws and regulations are hereby included by reference as part of these policies and procedures.

Changes may occur as statutory interpretations and clarifications become available from HUD or as NCC rules, procedures or guidelines are revised. No part of this policy guide shall override the rules set forth by Federal oversight of HUD. These policies supersede any previous ESG policies and are updated yearly.

In addition to the policies and procedure sections, this manual includes NCC Grant Forms and an Index of Reference Information in order to facilitate easy access in a format that will accommodate the users' needs and contribute to the proper implementation of the grant.

Questions and comments regarding the material contained in this manual may be referred to Nicole Waters, New Castle County, Community Development and Housing Division, 77 Reads Way, New Castle, DE 19720 or by telephone at (302) 395-5644.

Key Dates	
December 11, 2017	Application Deadline
March, 2018	Award Notification (tentative)
March, 2018	Draft Action Plan Available for Public Comment
April, 2018	Spring Public Hearing
April, 2018	Close of Public Comment
April, 2018	County Council Consideration of Draft Action Plan
May 15, 2018	Action Plan Due to HUD
July 1, 2018	Action Plan Programs Begin

Table of Contents

Section 1 - Applicability and Purpose	5
Section 2 – Summary Information	5
Notice of Funding Availability	5
Eligible Applicants.....	5
Application Guidelines	6
Awards and Agreements	6
Section 3 - Program Activities and Requirements	6
Categories of Eligible Spending	6
Eligible Activities	7
Ineligible Activities.....	7
Local Match Requirements.....	8
Beneficiaries and Client Eligibility Guidelines	8
Persons Who Are Homeless.....	8
Homeless Children and Youth.....	9
Eligible Rapid Re-Housing Recipients	9
Client Files	10
Confidentiality	10
Termination of Assistance or Rejection of Clients.....	11
Section 4 - Program Implementation	11
Project Planning.....	11
Performance Measures.....	11
Approved Budget.....	11
Spending Deadlines and Recapture	12
Reimbursement of Costs.....	12
Reimbursement Procedure	12
Documentation of Allowable Costs.....	12
NCC Forms	13
Financial Standards.....	13
Audit Requirements	14
Records Maintenance	14
Section 5 - Other Federal Requirements.....	14
Non-Discrimination Policy	14
Environmental Review Requirements	14
Drug- and Alcohol-Free Facilities	14

Homeless Representation and Participation on the Board	15
Relocation and Displacement	15
Conflict of Interest	15
Lead-Based Paint	15
Faith-Based Organizations	15
Section 6 - Compliance Monitoring and Reporting	16
Delaware Community Management Information System (DE-CMIS)	16
Coordinated/ Centralized Intake Process	16
Reporting Requirements	16
Monitoring	16
Sanctions for Non-compliance	17
Section 7 – General Definitions	17
Section 8 – Reference Information	20
Documentation of Homelessness	20
NCC Homeless Persons Documentation Table	21
NCC Inventory Policy for ESG	22
Monitoring Guidelines	22
Section 9 – Proposal Forms	30
General Application Submittal Details	30
Required Attachments Checklist	32
Application Cover Sheet	33
Summary of Funds Requested	34
Application Narrative	36
Emergency Solutions Grants Program Annual Report	39
Matching Funds Table	41
Methods of Involving Homeless Persons	42

Page numbers may not match actual pages once downloaded. Please remember to review this entire document for completion prior to submission.

Section 1 - Applicability and Purpose

The HEARTH Act of 2009 authorizes the ESG. The grant is available to units of general local government or private nonprofit organizations. The ESG is designed to help improve the quality of existing emergency shelters for the homeless, to make available additional emergency shelters, to help meet the costs of operating emergency shelters and to provide certain essential social services to homeless individuals. These persons will have access not only to safe and sanitary shelter, but also to the supportive services and other kinds of assistance they need to improve their situations. The program is also intended to restrict the increase of homelessness through the funding of preventative programs and activities.

Emergency food and shelter programs are essential to meet the most immediate life-threatening needs of people with nowhere to go. Shelters must be open around the clock, throughout the year. They must offer refuge tailored to the special circumstances determined by environment and individual need.

In addition to providing for the immediate needs of shelter and food, important goals for an emergency shelter system are the provision of medical care; assurance that assistance will be available to all who need it; establishment of a decent standard of quality for services; a "prevention" program for the "at-risk"; program cost-effectiveness; financial assistance for rapid rehousing and avoidance of the institutionalization of emergency programs.

Section 2 – Summary Information

Notice of Funding Availability

The funds are made available to interested applicants each year through an *Annual Public Meeting Notice and Funding Proposal Kickoff Meeting*, which is advertised in the statewide newspaper, emailed to parties on our internal Stakeholder's List and advertised on NCC's website. Instructions on how to apply for these grant monies are provided during the meeting and included in the notice. A contact person is listed in the notice for the benefit of interested parties who may have questions about the program.

Actual amounts awarded will depend on applications and may vary.

Eligible Applicants

For NCC ESG, eligible applicants are: 1) Units of general local government located in NCC; and 2) Private nonprofit organizations located in NCC. Assistance may be provided under this part to a religious organization if the religious organization agrees to provide all eligible activities under this program in a manner that is free from religious influences and in accordance with the following principles:

- It will not discriminate against any employee or applicant for employment on the basis of religion and will not limit employment or give preference in employment to persons on the basis of religion;

- It will not discriminate against any person applying for shelter or any of the eligible activities under this part on the basis of religion and will not limit such housing or other eligible activities or give preference to persons on the basis of religion; and
- It will provide no religious instruction or counseling; conduct no religious worship or services; engage in no religious proselytizing; and exert no other religious influence in the provision of shelter and other eligible activities under this part. Applicants that are primarily religious organizations are encouraged to contact NCC for specifics or refer to 24 CFR Part 576.23.

Application Guidelines

NCC will accept completed applications until 4:00 p.m. local time, Monday, December 11, 2017 at: 77 Reads Way, New Castle, Delaware 19720.

NCC is requesting original plus nine (9) copies of all applications and they must be in an envelope which is clearly marked “**ESG Application, Attention: Nicole Waters**” and include the applicant’s name. Applications received after the date and time listed above will not be opened and will be returned to the sender. No telephone, Internet or faxed applications will be accepted.

The basic elements of the threshold score are presented in the Application Narrative section of the ESG Application. The Narrative Exhibits must be included in the application in order for the project to be considered for maximum funding capability. The Exhibits are determined by NCC before the application process begins and may change periodically at their discretion according to funding focus and HUD guidelines. Using defined rating criteria; applications are reviewed and rated by a Review Panel comprised of professionals with knowledge and experience in homeless issues and grant management. Scores from each member are averaged for each proposal; the averaged score reflects the Panel’s determination of the merit of the project.

The NCC ESG review panel may also request Quarterly Project Performance Reports from Housing Alliance Delaware (HAD) when making funding determinations. This data comes directly from Delaware Community Management Information System (CMIS). Please ensure data entered in CMIS is accurate and complete. Contact HAD if you have questions regarding CMIS data.

Awards and Agreements

Sub-grantees will be notified in writing of the amount of the grant award. Included with the award letter will be a notice to provide an adjusted budget (if applicable) and information concerning the technical assistance meeting. Failure to adjust the budget and attend the technical assistance meeting will result in forfeiture of award.

Section 3 - Program Activities and Requirements

Categories of Eligible Spending

The three categories of eligible spending for NCC ESG funds are as follows:

- Emergency Shelter – shelter operations or essential services;
- Rapid Re-Housing - rental assistance, housing relocation and stabilization services; and

➤ Data Collection.

Although general guidelines for activities of the program are listed at 24 CFR 576.21, other possible costs may be eligible under the program provided they must:

- 1) Fit the statutory requirement of benefiting homeless persons and assisting their movement toward independent living;
- 2) Fit into one of the three eligible “spending categories” listed above; and
- 3) Are reasonable and customary to the area.

Eligible Activities

NCC’s ESG may be used to fund **ONE** of the following activities relating to emergency shelter for the homeless:

- **“Shelter Operational costs”** for maintenance, operations (including minor or routine repairs), rent, security, fuels and equipment, insurance, utilities, and furnishings.
- OR-
- **“Shelter Essential Services costs”** for case management to include the cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant.

**NCC’s Rapid Re-Housing portion of ESG will be designated to the Rapid Re-Housing provider Family Promise of Northern New Castle County, Inc. only.
Other Rapid Re-Housing agencies need not apply.**

- **“Rapid Re-Housing Activities”**, defined as activities or programs designed to help shorten the length of homelessness and regain housing stability after experiencing a housing crisis, included but not limited to:
 - Rental assistance/ Rent payments;
 - Relocation and Stabilization: Security deposits and utilities; and
 - Relocation and Stabilization: Case management.
- **“Data Collection”** to pay the costs to the designated sub-recipient who manages data entered into the CMIS.

Ineligible Activities

NCC’s ESG funds shall not be used for activities other than those listed above. Examples of ineligible uses include:

- Acquisition or construction of an emergency shelter for the homeless;
- Staffing costs other than for case management;
- Administrative costs;
- Rehabilitation services performed by the staff of a grantee or recipient, such as preparation of work specifics, loan processing or inspections; and
- Mortgage payments for shelters, unless a waiver is approved by NCC.

Local Match Requirements

Recipients shall be required to **provide matching funds in an amount at least equal to their approved ESG funding amounts for eligible program activities.** Matching funds must be derived from sources other than the Program, and only funds provided after the date of the grant to NCC will be considered as eligible matching funds. In calculating the amount of matching funds, the following types may be included:

- Cash;
- The value or fair rental value of any donated material or building;
- The value of any lease on a building;
- Any salary paid to staff to carry out the program of the recipient; and
- The value of the time and services contributed by volunteers to carry out the program of the recipient at a current rate of \$5 per hour.

Note: Volunteers providing professional services such as medical or legal services are valued at the reasonable and customary rate in the community.

The provisions of matching funds as specified by the applicants in the proposal will be considered a commitment to provide NCC amounts and types of matching contributions as stated in the proposal, if the applicant is provided assistance under this grant solicitation. The provision of matching funds will be a contractual requirement of any assistance agreement. During the review process of proposals, NCC reserves the right to require additional information concerning matching fund commitments, as necessary to be reasonably assured that such resources will be available.

ESG funds will not be released until after sufficient matching fund requirements have been met.

Beneficiaries and Client Eligibility Guidelines

Every client served by ESG funds must qualify for assistance according to HUD standards. Service providers are responsible for determining eligibility status for homeless clients. This documentation may come from either the participant or a third party information source and is typically obtained at intake, entry, or referral by another ESG service provider. Agencies will be required to complete NCC's Homeless Certification form for each person they serve under the ESG grant.

A copy of the documentation must be kept in the client file and made available to NCC or HUD for reimbursement, monitoring or risk analysis purposes. NCC provides guidance regarding client eligibility and documentation, which may be found in Documentation of Homelessness under Section 8.

Persons Who Are Homeless

Families and individuals who are homeless, or in danger of becoming homeless, are eligible to receive benefits from the ESG funds if they meet the definitions of "homeless" from the HEARTH Act of 2009:

➤ Four categories:

- People who are living in a place not meant for human habitation, in emergency shelter, in transitional housing, or are exiting an institution where they temporarily resided. The only significant change from existing practice is that people will be considered homeless if they are exiting an institution where they resided for up to 90 days (it was previously 30 days), and were in shelter or a place not meant for human habitation immediately prior to entering that institution.
- People who are losing their primary nighttime residence, which may include a motel or hotel or a doubled up situation, within 14 days and lack resources or support networks to remain in housing. HUD had previously allowed people who were being displaced within 7 days to be considered homeless. The proposed regulation also describes specific documentation requirements for this category.
- Families with children or unaccompanied youth who are unstably housed and likely to continue in that state. This is a new category of homelessness, and it applies to families with children or unaccompanied youth who have not had a lease or ownership interest in a housing unit in the last 60 or more days, have had two or more moves in the last 60 days, and who are likely to continue to be unstably housed because of disability or multiple barriers to employment.
- People who are fleeing or attempting to flee domestic violence, have no other residence, and lack the resources or support networks to obtain other permanent housing. This category is similar to the current practice regarding people who are fleeing domestic violence.

Homeless Children and Youth

- In general, children and youth in foster care are not considered homeless. Many foster children are in the custody of a public agency, which is responsible for providing housing for foster children. The foster home or care facility, although temporary, serves as a fixed, regular and adequate nighttime residence.
- Throwaway youth (i.e. those whose parents or guardians will not permit them to live at home) are considered homeless if they live on the streets, in shelters or in other transitional or inadequate accommodations.
- Youth who have run away from home and live in runaway shelters, abandoned buildings, the streets or other inadequate accommodations are considered homeless, even if their parents have provided or are willing to provide a home for them.

Eligible Rapid Re-Housing Recipients

Persons defined as homeless under the following criteria are eligible for Rapid Re-Housing assistance:

- Lack a fixed, regular, and adequate nighttime residence, meaning:
 - 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;
 - 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
 - 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;
- Any individual or family **who is living in an emergency shelter or other place described in paragraph (1)** and:
 - 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;
 - Has no other residence; and
 - Lacks the resources or support

Client Files

Client files should not only document homelessness eligibility, but should include a detailed record of the services provided to each client and the program funds that supported each service. ESG funding is directly related to project performance. Program outcomes can only be measured if full and precise information about activities and services provided are gathered and maintained for reporting.

Note: Any demographic and service information requested on the Annual Performance Report should be a regular part of recordkeeping procedures for project sponsors. Client files should reflect dates, types, program costs, etc., of all services in order to document both efficient grant management and the success of the shelter project.

Confidentiality

42 U.S.C. 11375 (c)(5) requires service providers assisting clients in domestic violence situations to ensure that their records are kept confidential. NCC will not disclose non-public, personal information to any non-affiliated third party except as required by law, or with the client's written permission. Client information should not be accessible to any persons other than authorized Service Provider personnel, or authorized personnel from NCC and HUD for Compliance Monitoring and/or Audit purposes. The CMIS used for required homeless tracking statistics includes ample safety measures for confidentiality as well. Locations of domestic violence shelter facilities receiving ESG funds will not be publicly disclosed except with the written authorization of the person responsible for shelter operations.