

## The State of Missouri Program Standards for ESG-Funded Homelessness Prevention Programs

The State of Missouri developed the following ESG-funded Homelessness Prevention Program standards to ensure:

- Program accountability to individuals and families at-risk or at imminent risk of experiencing homelessness
- Program compliance with HUD and State of Missouri rules
- Program uniformity
- Adequate program staff competence and training, specific to the target population being served

### **DEFINITIONS:**

**Homelessness prevention** – A program designed to prevent individuals and families from becoming homeless by remaining stably housed and achieving long-term stability in that housing. Homelessness Prevention assistance is offered without preconditions (such as employment, income, absence of criminal record, or sobriety), and the resources and services provided are typically tailored to the unique needs of the household. The core components of a Homelessness Prevention program are housing identification and relocation, short-and/or medium-term rental assistance, move-in (financial) assistance, and case management and housing stabilization services. [24 CFR 576.103](#)

**Imminent Risk** – For the purposes of Homelessness Prevention, imminent risk of homelessness means: An individual or family who will imminently lose their primary residence, provided that: (1) Residence will be lost within 14 days of the date of application for homeless assistance; (2) No subsequent residence has been identified; and (3) Has an annual income below 30 percent of median family income for the area, as determined by HUD; (4) Lacks resources or support networks needed to obtain other permanent housing (5) Any individual or family who 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; and has no other residence and lacks the resources or support networks, e.g., family friends, faith-based or other social networks, to obtain other permanent housing. [24 CFR 576.2](#)

**At-Risk**—For the purposes of Homelessness Prevention at-risk of homelessness means: (1) An individual or family who: (i) Has an annual income below 30 percent of median family income for the area, as determined by HUD; (ii) 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 (iii) Meets one of the following conditions: (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance; (B) Is living in the home of another because of economic hardship; (C) 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; (D) 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; (E) 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 reside per room, as defined by the U.S. Census Bureau; (F) 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 (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan. [24 CFR 576.2](#)

**Family** - includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, any group of persons presenting for assistance together with or without children and irrespective of age, relationship, or whether or not a member of the household has a disability. A child who is temporarily away from the home because of placement in foster care is considered a member of the family. [24 CFR 5.403](#).

**Housing First**- an approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment or service participation requirements. Supportive services are offered to maximize housing stability and prevent returns to homelessness as opposed to addressing predetermined treatment goals prior to permanent housing entry.

**Homeless Management information System (HMIS)**- The information system designated by the Continuum of Care to comply with HUD's data collection, management, and reporting standards and used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at-risk of homelessness. [24 CFR 576.2](#)

**Coordinated Entry**- a process developed to ensure that all people experiencing a housing crisis have fair and equal access and are quickly identified, assessed for, referred, and connected to housing and assistance based on their strengths and needs

## **PERSONNEL**

**STANDARD:** The program shall be adequately staffed by qualified personnel to ensure quality service delivery, effective program management, and the safety of program participants.

### **CRITERIA:**

1. The program provides training to all paid and volunteer staff on both the policies and procedures employed by the program and on specific skill areas as determined by the program.
  2. All paid and volunteer service staff participate in ongoing and/or external training and development to further enhance their knowledge and ability to work with individuals and families experiencing homelessness and/or other issues that put individuals or families at risk of housing instability.
  3. All paid and volunteer staff should be trained in cultural competency and skilled at working
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with diverse populations.

4. For programs that use HMIS or a Comparable Database, all users must abide by the standard operating procedures found in the HMIS/Comparable Database Policies and Procedures manual provided by the HMIS/Comparable Database vendor. Additionally, users must adhere to the privacy and confidentiality terms set forth in the User Agreement.
5. All staff have a written job description that at a minimum addresses the major tasks to be performed and the qualifications required for the position.
6. Staff should be knowledgeable about mainstream programs and services in the community.
7. The program operates under an affirmative action/civil rights compliance plan or letters of assurance.
8. Agency staff review current cases and individual service plans on a regular and consistent basis to ensure quality/coordinated services.

### **CLIENT INTAKE PROCESS**

**STANDARD:** The program will be an active member in the Coordinated Entry system. The program will have minimal entry requirements to ensure the most vulnerable of the population are being served to prevent participants from becoming literally homeless. The program will assist participants in maintaining housing stability or locating safe, affordable housing that meets participants' needs in accordance with client intake practices and within ESG guidelines.

#### **CRITERIA:**

1. All Program participants must meet the following program eligibility requirements:
  - a. The household must meet either category 2 or category 4 of the homeless definition, set forth by [HUD](#); At-risk individuals are eligible for assistance in Homelessness Prevention projects.
  - b. Individuals and families must have an annual income below 30% of AMI
2. Programs cannot disqualify an individual or family because of evictions or poor rental history, criminal history, credit history, sexual orientation/gender, or on the basis of domestic violence history.
3. The program explains the services that are available and the expectations for participation. A copy of the program expectations are given to the household prior to program entry.
4. The program will maintain a Release of Information that allows the sharing of information with relevant people and/or agencies. Program participants will be offered copies of all Releases of Information that they have signed, and have the right to revoke any Release of Information without penalty.
5. For each individual and family determined ineligible to receive Emergency Solutions Grant (ESG) assistance, the record must include documentation of the reason for that determination.  
[24 CFR 576.500](#)

### **PRIORITIZATION**

**STANDARD:** Programs will determine and prioritize eligible families and individuals to target Homelessness Prevention assistance.

#### **CRITERIA:**

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1. The program will prioritize each applicant household using the local CoC Coordinated Entry process.

### **PROGRAM OPERATIONS**

**STANDARD:** The program will assist participants in achieving housing stability within their current housing or locating other safe, affordable housing that meets participants' needs.

#### **CRITERIA:**

1. Assistance will be tailored to individual client needs in order to achieve housing stabilization.
2. The program may provide assistance in accordance with the ESG [CFR 576.105/106](#). Eligible costs may include rental application fees, moving costs, temporary storage fees (up to 3 months), security deposits (up to 2 months), short and/or medium term rental assistance, utility deposits, utility payments (including up to 6 months arrears), rental arrears (one-time payment of up to 6 months arrears), credit repair, and legal services related to obtaining or retaining permanent housing.
3. The program staff and the participant work together to develop a housing stabilization plan, which may include financial goals, periods and amounts of assistance, meeting schedules, employment goals, and a program exit strategy. [24 CFR 576.105](#)
4. Agencies should have standards for client income contribution. If an agency has income contribution standards they must apply to all program participants.
5. For one-time assistance the program may make a one-time payment for up to 6 months of arrears for rent and each utility in accordance with [24 CFR 576.106](#) and in accordance with any additional requirements by the ESG funder.
6. The program provides assistance in locating and accessing other suitable housing when necessary.
7. In locating housing, the program considers the needs of the individual or family at-risk of experiencing homelessness.
8. Programs will assess potential housing for compliance with ESG requirements for habitability, lead-based paint, and rent reasonableness and fair market rent standards prior to the participant signing a lease with the landlord, and the program signing a rental assistance agreement with the landlord.
9. The program signs a rental assistance agreement with the landlord which must set forth the terms under which rental assistance will be provided, which meets all the requirements of the ESG Funder, and as outlined in ESG [CFR 576.106](#)
10. The program participant must sign a legally binding written lease with the landlord which must include a lease provision or addendum that includes all requirements that apply to tenants, the owner, or lease under 24 CFR part 5, subpart L (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking)
11. Individual case management is offered to program participants at least monthly. Case management includes the following:
  - a. ***Housing Stability Case Management*** assists participants in achieving permanent housing stability, which may include:
    1. Assessment of housing barriers to stability, needs, and preferences
    2. Development of a stabilization plan for maintaining or locating housing

3. Outreach to and negotiation with landlords
  4. Tenant support and/or counseling
  5. Coordinating utility services
  6. Housing search
  7. Making moving arrangements
  8. Assistance with submitting rental applications
  9. Understanding leases
  10. Assessment of housing for compliance with ESG requirements for habitability, lead-based paint, and rent reasonableness
  11. Monthly documented contacts with HP participants.
- b. **Ongoing Case Management** services include assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability by:
1. Developing an individualized housing stabilization plan, including planning a path to permanent housing stability
  2. Developing, securing, and coordinating services
  3. Obtaining Federal, State, and local benefits
  4. Monitoring and evaluating program participant progress
  5. Providing information about, and referrals to, other providers
  6. Conducting re-evaluations to determine on-going program eligibility
12. Other eligible services may be provided including:
- c. **Legal Services** to resolve a legal problem that prohibits a program participant from obtaining or retaining permanent housing, including:
1. Client intake
  2. Preparation of cases for trial
  3. Provision of legal advice
  4. Representation at hearings
  5. Counseling
  6. Filing fees and other necessary court costs
- d. **Mediation** between the program participant and the landlord or person(s) with whom the participant is living
- e. **Credit Repair**, including:
1. Credit counseling
  2. Accessing a free personal credit report
  3. Resolving personal credit problems
  4. Other services needed to assist with critical skills related to household budgeting and money management
13. The program will re-evaluate the household for continued eligibility a minimum of once every 90 days. To continue to receive Homelessness Prevention assistance, the household must demonstrate:
- f. Lack of resources and support networks. The household must continue to lack sufficient resources and support networks to retain housing without program assistance.
  - g. Need. The program must determine the amount and type of assistance that the household needs/wants to (re)gain stability in permanent housing.

- h. Income. The household's annual income must be below 30% AMI.
- i. ESG funder requirements. Any additional requirements by the ESG funder.

### **SERVICE COORDINATION**

**STANDARD:** The program will assist program participants, pursuant to [24 CFR §576.400](#), in attempting to obtain appropriate supportive services and other Federal, State, local, and private assistance available for such individuals as needed and requested by the household.

#### **CRITERIA:**

1. Arrangements shall be made as appropriate and available with community agencies and individuals for the provision of education, employment, and training; schools and enrichment programs; healthcare and dental clinics; mental health resources; chemical dependency assessments and treatment; legal services; budgeting and credit repair; and other assistance requested by the participant, which are not provided directly by the program.
2. Other mainstream resources for which, if eligible, a client may be assisted in obtaining, include: Emergency Financial Assistance; domestic violence shelters; local Housing Authorities, public housing, rent subsidies and subsidized housing; temporary labor agencies; childcare resources and public programs that subsidize childcare; consumer credit counseling service agencies; youth development and child welfare; Community Support Programs; WIC; SNAP; Unemployment Insurance; Social Security benefits; Medicaid/Medicare.

### **TERMINATION**

**STANDARD:** Termination is expected to be limited to only the most severe cases. Programs will exercise judgment and examine all extenuating circumstances when determining if violations are serious enough to warrant termination.

#### **CRITERIA:**

1. In terminating assistance to a program participant, the agency must follow the due process provisions set forth in [24 CFR 576.402](#), as well as the following process: (1) providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance; (2) written notice to the program participant containing a clear statement of the reason for termination; (3) providing a review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and providing (4) prompt written notice of the final decision to the program participant.
2. Termination under this section does not bar the program from providing further assistance at a later date to the same individual or family.
3. Programs are encouraged to re-house, rather than terminate assistance to households that are evicted from their housing while participating in the Homelessness Prevention program.

### **FOLLOW-UP SERVICES**

**STANDARD:** The program shall attempt to provide a continuity of services as necessary to all participants following their exit from the program. These services can be provided directly and/or through referrals to other agencies or individuals.

**CRITERIA:**

1. The program develops exit plans with the participant to ensure continued housing stability and connection with community resources, as desired.
2. It is recommended that a program attempt to follow up with phone or written contact at least once after the client exits the program. A program may provide follow-up services that include identification of additional needs and referral to other agency or community resources in order to prevent future episodes of housing instability.

**CLIENT FILES**

**STANDARD:** The documentation necessary for the effective delivery and tracking of service will be kept up to date and the confidentiality of program participants will be maintained.

**CRITERIA:**

1. The file maintained on each participant must, at a minimum, include information required by HUD and the funder, eligibility documentation and backup, housing stabilization plans, and case notes.
2. Client information must be entered into HMIS or a Comparable Database in accordance with the data quality, timeliness and additional requirements found in the HMIS/Comparable Database Policies and Procedures manual provided by the vendor.
3. The program will maintain each participant file in a secure place and shall not disclose information from the file without the written permission of the participant as appropriate except to project staff and other agencies as required by law.
4. All records pertaining to ESG funds must be retained for 5 years after the expenditure of all funds from the grant under which the program participant was served. Copies made by digital scanning, photocopying, or similar methods may be substituted for the original records. Records pertaining to other funding sources must adhere to those record retention requirements.

**EVALUATION AND PLANNING:**

**STANDARD:** Ongoing program planning and evaluation will be conducted.

**CRITERIA:**

1. The program has written goals and objectives for its services to meet the outcomes required by HUD, the local Continuum of Care, and the funder.
2. The program reviews the case management, housing, and follow-up needs of program participants and the existing services that are available to meet these needs. As appropriate, revisions to goals, objectives and activities are made based on program evaluation and HMIS data.
3. The program exhibits due regard for participant privacy in conducting and reporting its evaluation.

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