

## ATTACHMENT H: ESG EXPECTATIONS FORM

### Introduction

Texas Homeless Network (THN) serves as the Collaborative Applicant and Lead Agency for the Texas Balance of State Continuum of Care (TX BoS CoC) and is charged by the United States Department of Housing and Urban Development (HUD) to operate and administer Continuum of Care (CoC) activities. In order to operate and administer CoC activities, the TX BoS CoC works to coordinate Agencies for system planning and to evaluate system-wide performance toward making homelessness rare, brief, and non-recurring in 215 counties comprising the TX BoS CoC geographic service area.

All CoC's are required to coordinate and consult with Emergency Solutions Grant (ESG) Recipients in the geographic service area of the CoC. In the TX BoS CoC, THN coordinates State ESG activities with The Texas Department of Housing and Community Affairs (TDHCA) as well as other City and County ESG Recipients. TDHCA has designated THN as the ESG Coordinator for the TX BoS CoC. As the ESG Coordinator for TDHCA, THN is responsible for Sub award recommendations for funding to TDHCA for State ESG Funding. In order to ensure that Applicants recommended for Sub award are aware of the minimal expectations of the TX BoS CoC, THN has set forward the following expectations for all State ESG Subrecipients applying for ESG in the TX BoS CoC.

All State ESG Subrecipients are responsible for adhering to all requirements and obligations outlined by HUD and TDHCA, in addition to the expectations outlined by the CoC in this document. In the event that any expectation in this document conflicts with any federal regulation, notice, guidance, Texas Administrative Code, or TDHCA guidance, the remainder of the expectations will remain in effect.

This document will be reviewed annually. In the event that ESG Subrecipient responsibilities change, revisions will be made to this certification and a new signature by an authorized representative of the ESG Program Subrecipient agency will be required.

The TX BoS CoC strongly encourages projects that do not receive State ESG program funds to accept these expectations as well.

### Background and Purpose

ESG funds are unique from other HUD resources dedicated to preventing and ending homelessness because ESG funds activities that are designed to be the first step in a continuum of assistance to prevent and end Homelessness. Quite often though, ESG funding represents the sole Federal investment in a community. Therefore, it is critical to ensure that ESG Funding is serving its intended purpose. The regulations governing the ESG program are collectively known as the ESG Interim Rule and can be found at 24 CFR

576. State ESG Subrecipients are also expected to be familiar with and comply with any additional requirements placed on Subrecipients by TDHCA.

Further, HUD expects collaboration and coordination between CoCs and ESG Recipients. The following are the most important areas of coordination and collaboration

- a) Coordinated Entry
- b) Written Standards for administering assistance
- c) Allocation Planning and Reporting

The intent of this document is not to satisfy the required coordination and collaboration activities. These activities are required for Recipients of ESG funding. As Subrecipients, agencies are agents of Recipients and have actionable activities that will further the coordination and collaboration activities between the TX BoS CoC and ESG Recipients. The following are minimal expectations related to the above activities:

#### **a) Coordinated Entry**

ESG Program Recipients and State Subrecipients are statutorily required to participate in the CoC's Coordinated Entry Process including adhering to the Coordinated Entry Written Standards. Victim Service Providers may participate in a "DV workaround". In the TX BoS CoC, communities manage the local Coordinated Entry Process in coordination with THN staff.

##### Expectation:

All State ESG Subrecipients administering Rapid Re-Housing will, at minimum, only accept participant referrals from the local Coordinated Entry System. Victim Service Providers will participate in the DV Workaround.

##### Recommendation:

All State ESG Subrecipients should participate in the development and implementation of the local Coordinated Entry System, to the greatest extent possible. More information about Coordinated Entry in the TX BoS CoC can be found at <https://www.thn.org/texas-balance-state-continuum-care/coordinated-entry/> or by contacting [ce@thn.org](mailto:ce@thn.org).

#### **b) Written Standards for Administering Assistance**

While State ESG Subrecipients are not required to consult with CoC's when creating ESG Written Standards for Administering Assistance, consultation is recommended in order to ensure that services administered in the TX BoS CoC are comparable from community to community.

##### Expectation:

State ESG Subrecipients are expected to maintain Written Standards for Administering Assistance that are compliant with HUD and TDHCA requirements and be able to provide them to the TX BoS CoC in the first month of a new grant cycle or, upon request.

Recommendation:

State ESG Subrecipients shall adopt best practices to the greatest extent possible, and document their adoption in the Written Standards for Administering Assistance. It is further recommended that State ESG Subrecipients utilize and build upon templates made available to the public at [tdhca.state.tx.us](http://tdhca.state.tx.us). Successful State ESG Subrecipients will review Written Standards for Administering Assistance annually and seek consultation from the TX BoS CoC. Send requests for consultation to [esg@thn.org](mailto:esg@thn.org).

**c) Allocation Planning and Reporting**

While State ESG Subrecipients are not responsible for Allocation Planning, there is value in the feedback of local government and private nonprofits in that process. While THN is the ESG Coordinator for the TX BoS CoC, every effort to solicit that feedback will be made. Reporting on the outputs and outcomes of the ESG Program falls squarely upon Recipients and Subrecipients of ESG Program Funding.

Expectations:

State ESG Subrecipients are expected to maintain subscriptions or access to the Homeless Management Information System (HMIS) or in the case of Victim Service Providers, a comparable database capable of providing the reports required by HUD or TDHCA. State ESG Subrecipients entering data into HMIS or a comparable database must submit all required reports requested by TDHCA, or THN in accordance with established policy or identified in the request. It is the responsibility of the Subrecipient to request any extensions or exceptions to reporting deadlines. State ESG Subrecipients entering data into HMIS are expected to designate a staff person as an HMIS Administrator consistent with the HMIS Policies and Procedures available for review at [thn.org](http://thn.org).

Recommendations:

State ESG Subrecipients must maintain a Data Quality Error rate of less than 5% for all data elements. Exceptions or exemptions for individual Data Elements may apply. It is recommended that all State ESG Subrecipients designate an employee to attend all HMIS Monthly webinars to understand all required HMIS components.

**Additional Expectations**

Consumer Involvement:

All State ESG Subrecipient are required to have an individual or individuals with lived experience on the Board of Directors or other equivalent policymaking entity. Recipients must keep a letter on official letterhead documenting that at least one person currently experiencing homelessness or formerly homeless serves on the Board or other equivalent policy making entity.

**CoC Engagement**

- State ESG-funded entities must attend at least 75% of CoC General Meetings in a 12-month period by having at least one representative staff member with direct involvement in operations and/or oversight of the project participate via either webinar or in-person, as required.
- State ESG Subrecipients are encouraged to participate to the greatest extent possible by providing feedback to the CoC on documents made available for public comment.

**Additional ESG Program Resources:**

- [ESG Program Interim Rule \(24 CFR Parts 91 and 576\)](#)
- [HUD ESG Frequently Asked Questions](#)
- [TDHCA ESG Program Index](#)
- [TDHCA ESG Program Guidance](#)
- [Opening Doors](#)
- [Home, Together](#)
- [TX BoS CoC Policies and Procedures](#)
- [TX BoS CoC Written Standards for service Delivery](#)
- [TX BoS CoC Coordinated Entry Written Standards](#)

**Authorized Agency Representative Information**

Agency:	
Contact Person:	
Email Address:	
Contact Number:	

I have read, understand, and agree to the expectations set forth in this agreement. These expectations become effective upon date signed below.

*Signature*

*Date*

*Printed Name*

*Title*