

# City of Spokane Emergency Solutions Grant Written Standards

## I. Introduction and Scope

[The Homeless, Housing, Operations and Services Guidelines](#) (HHOS), published by the City of Spokane, establish the local policies and procedures required to meet Continuum of Care (CoC) and Emergency Solutions Grant (ESG) written standards. In accordance with 24 CFR 576.400 and HUD CoC Program requirements. The HHOS Guidelines operationalize standards for determining participant eligibility, prioritizing assistance, and administering program components including street outreach, rapid rehousing, transitional housing, permanent supportive housing, homelessness prevention, emergency shelter, and coordinated entry. Collectively, these guidelines constitute the City's adopted written standards for ensuring that CoC and ESG funded assistance along with State and Local funded projects are delivered in a consistent, compliant, and performance-driven manner.

## II. Alignment with the CoC Five-Year Plan to End and Prevent Homelessness and HHOS Guidelines

ESG Activities will support the CoC goal of making homelessness rare, brief, and non-recurring. Strategic alignment includes:

1. Prioritizing unsheltered households and those with the greatest barriers.
2. Advancing equitable access and outcomes (this is especially important in the context of rural and urban households).
3. Increasing exits to permanent housing.
4. Reducing length of time homeless.
5. Improving system-wide data quality and accountability.

## III. Collaborative Applicant Authority and Governance

The City of Spokane, as ESG recipient and Collaborative Applicant, retains authority to monitor ESG subrecipient compliance with federal requirements, local Written Standards, and performance expectations and any other applicable requirements under the HHOS Guidelines (published by HHS).

## IV. Coordinated Entry and SALA Assessment

All households seeking ESG assistance that utilize Coordinated Entry must access services through the Spokane Regional CoC Coordinated Entry System (CES).

Assessment and prioritization shall be conducted using our locally adopted SALA Assessment tool in accordance with the CoC Coordinated Entry Policies. No alternative assessment tool shall be used for ESG prioritization. All ESG referrals and placements must follow SALA-based prioritization and CE ranking policies.

## **v. Eligibility & Documentation**

Households must meet ESG eligibility criteria as defined in 24 CFR §576.2. Depending on project type, eligibility and documentation of eligibility is required. Subrecipients are expected to familiarize themselves with controlling CFR's. Households must meet eligibility at program entry, and the documentation must support these criteria. Attached to these Written Standards is a general checklist that providers are encouraged to use in building out their own policies and procedures. This checklist is a minimum floor on what the City expects to see in a client file.

## **VI. Performance and Fiscal Utilization Expectation for ESG Subrecipients**

ESG subrecipients are expected to demonstrate effective program performance, fiscal responsibility, and full participation in system coordination.

### **1. Program Performance:**

Projects must adhere to the Five-Year Plan to Prevent and End Homelessness Program Management Plan. These metrics include, at minimum, length of time homeless, positive exits to housing (TH, PSH, PH), return to homelessness, and income growth.

### **2. Inventory Utilization:**

Projects must maintain appropriate bed/unit utilization and assist the City with the States' annual "Golden Report". Subrecipients are expected to alert the City to any changes to their inventory within 30-days. Failure to communicate changes to the HMIS team may result in corrective action.

### **3. Spenddown Expectations:**

Projects are expected to meet reasonable quarterly expenditures, barring any delays with contracts outside the control of the provider. Projects that are not being spent out in an appropriate or timely manner may be required to submit a Financial Improvement Plan. Failure to demonstrate improvement

may result in funding adjustments, reduction of award, or non-renewal consideration consistent with ESG and local authority.

#### **4. HMIS Participation and Data Quality**

As noted in the Checklist, all homeless projects funded by the City of Spokane must participate in HMIS (or a comparable database), maintain data quality standards, accept Coordinated Entry referrals (if applicable), and contribute to local System Performance Measures.

Persistent underperformance, low utilization, non-participation in Coordinated Entry, fiscal inefficiencies, or documentation deficiencies are identified, the City may require a corrective action plan prior to funding determinations. For projects receiving both ESG and CoC Program funds, the CoC Reallocation Policy may be considered during ESG renewal evaluation.

### **VII. ESG Corrective Action & Appeal Process**

If an ESG funded project is identified for funding reduction, non-renewal, or significant adjustment due to performance or spenddown concerns, the subrecipient will receive written notification outlining the basis for the decision.

The subrecipient may submit a written response or appeal within seven (7) days of notification, The City will receive submitted materials and issue a written determination within fourteen (14) business days.

This ESG appeal process is separate from the CoC Reallocation Appeal Process and applies solely to ESG funding decisions.

## **GENERAL CHECKLIST FOR PROGRAM ENROLLMENT**

Households must meet ESG eligibility criteria as defined in [24 CFR §576.2](#). Depending on project type, eligibility and documentation of eligibility is required. Subrecipients are expected to familiarize themselves with controlling CFR's. Households must meet eligibility at program entry, and the documentation must support these criteria. Below is a general checklist that all agencies must maintain, at minimum, in a client file.

1. Participant Eligibility and Intake
  - a. Third Party Certification of Homeless Status Documentation (Categories 1-4 as applicable)
  - b. Third Party Certification of Income Eligibility (30% AMI)
  - c. Intake assessment completed
  - d. *Self-Certifications should only make up 10% or less of total households served.*
2. Inspection: [Housing Quality Standard or NSPIRE](#)
  - a. An inspection must be conducted prior to Move-In.
  - b. Inspection must be documented and signed by the inspector. For a copy of an HQS/NSPIRE template please reach out directly to the Spokane Housing Authority. Inspections can be done by *any* certified HQS/NSPIRE inspector.
  - c. All units must be inspected annually if household is enrolled for 12 months or more.
3. Fair Market Rent
  - a. ESG does **not** allow rent to exceed Fair Market Rent. Providers can find Spokane County's FMR and Utility Allowances on the [Spokane Housing Authority's website](#).
  - b. In addition to meeting FMR, all units must also meet Rent Reasonableness. Rent Reasonableness shall follow the same criteria as outlined in the [Spokane Housing Authority Administrative Plan](#).
4. Financial Assistance and Payments
  - a. Lease (usually 12-months)
  - b. All rental payments must be documented in HMIS.
  - c. All payments outside of rental assistance must also be documented and allowable.
  - d. No duplicate assistance across funding sources.

- e. Payments align with participant eligibility and provider program rules. Progressive case management is expected to be a core tenet of all program policies and procedures.
5. Participant File Documentation
    - a. Complete household file is maintained (electronically or paper)
    - b. Required forms signed and dated.
    - c. Case notes support services provided.
    - d. Documentation is chronological and consistent.
  6. Case Management
    - a. Case management provided (if required by project type).
    - b. Housing stability plan documented each month that subsidy is paid, or household is still enrolled in program.
    - c. Regular contact is documented (paper file or internal database).
  7. HMIS and Data Quality
    - a. Household is entered into HMIS (or comparable database) and all services provided are also documented.
    - b. Data is timely and accurate.
  8. Fair Housing and Equal Access
    - a. Subrecipients are expected to provide households with Fair Housing information (typically a brochure that can be accessed by NW Fair Housing or the Tenants Union)
    - b. Subrecipients are expected to have information on Fair Housing and Non Discrimination publicly displayed in a public space at their respective agencies. This information should be in at least 2-3 different languages (top 2-3 spoken in Spokane).
    - c. Equal Access Policies shall also be included in the policies and procedures of all subrecipients.
  9. Termination Procedures
    - a. Written termination policy is followed and reviewed on a regular cadence.
    - b. Household has received and signed the policy.
    - c. Opportunity for appeal provided and also signed.
  10. Procurement and Conflicts of Interest (if applicable)
    - a. This component is tied to subrecipient staff. All staff are expected to sign an attestation that if a conflict of interest arises, they are expected to alert their supervisor. Conflict of Interests should be signed annually (or at least biannually) and as new staff are onboarded.
    - b. All subrecipients must maintain procurement policies when applicable.
  11. Shelter and Facility Standards (if applicable)

- a. Shelter meets minimum habitability standards.
- b. Safety and sanitation requirements are met.