

SNAPS-Shots

Bite-Size Information on the Emergency Solutions Grants and Continuum of Care Programs

May 22, 2013

ESG Requirements for Case Management to Help Ensure Housing Stability: Rapid Re-Housing and Homelessness Prevention Assistance

Did you know?

Assistance through the Emergency Solutions Grants (ESG) program is intended to be provided as a part of a system-wide approach. In order to evaluate and coordinate services to the greatest extent possible, ESG recipients and subrecipients providing ESG-funded rental assistance or housing and relocation services under the Rapid Re-Housing and/or Homelessness Prevention components must:

- Develop a plan with each program participant on how they will retain permanent housing after the ESG assistance ends (see 24 CFR 576.401(e)(1)(ii)).
- Require program participants to meet with a case manager not less than once per month while they are receiving ESG-assistance to implement the plan and monitor progress towards housing stability (see § 576.401(e)(1)(i)).*
- Assist program participants in obtaining appropriate supportive services, as well as connecting them to other federal, state, local, and private benefits and services for which they may be eligible. This includes, but is not limited to, Medicaid, SNAP, WIC, unemployment insurance, SSI/SSDI, services for veterans, and TANF (see § 576.401(d)).
- Have written policies and procedures for coordination among different providers of services in the community. Activities must be coordinated and integrated to the maximum extent practicable (see § 576.400(e)(3)(v)).

***Exception:** Recipients and subrecipients are exempt from the requirement to meet with program participants monthly if they also receive funding under the Violence Against Women Act of 1994 (VAWA) or the Family Violence Prevention and Services Act (FVSP) because these programs prohibit making housing conditional on the program participant's acceptance of services (see § 576.401(e)(2)).

The approach to case management described above is required when providing any amount of Rapid Re-Housing or Homelessness Prevention assistance, even when just a one-time payment of rent/utility arrears is being provided. In this instance, a single case management session may meet the program's requirements so long as the housing plan can be established and the referrals to mainstream resources can be completed during the initial intake meeting. The recipient or subrecipient may require the program participant to attend additional follow-up meetings as a condition of receiving assistance.

****Please note: This SNAPS-Shot is provided as a resource to help recipients and subrecipients understand the ESG program rule. Always refer to the program regulations to ensure compliance with program requirements.****

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Providing ESG Case Management Services without Rental or Financial Assistance

Under the Rapid Re-Housing and Homelessness Prevention components, ESG funds can be used for case management services (or other services) alone. That is, although rental assistance cannot be provided independent of case management services, case management can be provided independent of rental assistance. For example, services (such as case management) could be provided after the term of a program participant's rental assistance expires, as long as the 24-month cap for each type of assistance is not exceeded.

ESG "stand alone" case management or other services can also be provided to support program participants who receive rental assistance through non-ESG programs, as long as the individual or family is eligible for ESG assistance at the time of the intake evaluation and any recertification(s) of eligibility.

Limitation on Housing Stability Case Management Under the Rapid Re-Housing Component

Often, households that are eligible for Rapid Re-Housing assistance reside in an emergency shelter or in a place not meant for human habitation while they wait for a unit to be identified. The following principles for charging the costs of housing stability case management under Rapid Re-Housing apply in these situations:

- Recipients/subrecipients may provide housing stability case management assistance under the Rapid Re-Housing component for up to 30 days during the period these program participant is residing on the street or in an emergency shelter and seeking permanent housing (see § 576.105(b)(2)).
- If the program participant needs more than 30 days of housing stability case management assistance while they are sleeping in an emergency shelter or on the street (or other place not meant for human habitation), it must be charged either to Emergency Shelter: essential services or Street Outreach: case management, as appropriate. The costs are then subject to the cap on these components.
- Once the program participant is in permanent housing, housing stability case management can be provided under the Rapid Re-Housing component for up to 24 additional months.

For more information, see the [ESG interim regulation](#) at §576.401(d) and §576.401(e).

Ask A Question

HUD's ESG SNAPS-Shots are intended to help strengthen the field's understanding of the ESG regulation by breaking down the rule into small, easily digestible portions.

If you have questions or suggestions for SNAPS-Shots topics, please submit them to HUD via [OneCPD Ask A Question](#) help desk.