

Homeless System Response:

Carrying Out Coordinated Entry Activities Under the ESG Program

Background

As Continuums of Care (CoCs) and Emergency Solutions Grants (ESG) program recipients respond to the COVID-19 pandemic, Coordinated Entry (CE) should remain central to re-housing efforts. CE remains a requirement for CoC and ESG projects and can be used to meet urgent housing needs associated with COVID-19 risk factors. CE policies have the potential to directly address inequities in the homeless response system and protect those most vulnerable to the pandemic by streamlining connections to permanent housing for people at high risk of COVID-19 complications. As communities re-house households during the COVID-19 crisis, it is critical they use an equitable process that prioritizes persons most disproportionately impacted by both the pandemic and homelessness, including Black, Indigenous, and other People of Color (BIPOC). View guidance and strategies on how to [advance equity in CE planning, assessment, and prioritization processes](#).

-Q&A-

Question: Can I set up a CE project in the Homeless Management Information System (HMIS) for my ESG program?

Answer: No. Although ESG and ESG coronavirus (ESG-CV) funds may be used for certain CE costs, the CE project type may never be used for HMIS project setup for any ESG-funded activities.

The ESG program regulations at 24 CFR 576.400(d) require that each ESG-funded project within the CoC's area must use the continuum's CE system. Therefore, ESG projects must be integrated into the CoC's CE process. ESG funds can be used to fund CE activities in different ways and the purpose of this document is to outline how ESG program funding may be used for CE costs. The first section explains how ESG funds—including annual ESG funds **not** designated to prevent, prepare for, and respond to coronavirus ([PPR](#))—may be used for CE costs that are eligible under the ESG regulations. The second section of this document details how annual ESG designated to PPR and ESG-CV funds may be used for expanded CE, an additional eligible activity provided in Section III.E.3.k of [Notice CPD-21-08 \(ESG-CV Notice\)](#).

As CoCs and ESG recipients implement CE changes to further protect households experiencing homelessness, it is critical that communities understand what CE activities can be funded through each program. View information on [how CoC funds can be used for CE activities](#).

Ways to Fund CE Activities with Annual ESG Funds **Not** Designated to PPR

Annual ESG funds that are **not** designated to PPR can be used to support CE in the limited ways explained in this section of the document. The primary way that annual ESG funds (**not** designated to PPR) can be used for CE is through eligible ESG activities carried out in support of CE, which are generally limited to Case Management under the Street Outreach (SO) and Emergency Shelter (ES) components, and Housing Stability Case Management under the Rapid Rehousing (RRH) and Homelessness Prevention (HP) components. Annual ESG (**not** designated to PPR) may also fund CoC-funded projects dedicated to CE assessments on a prorated basis based on the number of referrals made to ESG-funded projects. The table below outlines examples of eligible ESG activities (**not** designated to PPR) related to supporting CE, including HMIS costs.

Eligible CE Activities by ESG Component

ESG (Non-PPR) Activity	Examples ¹
Overhead costs under SO, ES, RRH, HP	<ul style="list-style-type: none"> Contributing a prorated amount of ESG funds to overhead costs of a CE project. Base the prorated amount on the number of program participants referred to an ESG project.

¹ These examples are not an exhaustive list but are included for illustrative purposes.

ESG (Non-PPR) Activity

Examples¹

Note: ESG recipients or subrecipients contributing overhead funds to a CE project must only report on the clients referred to an ESG-funded project under the applicable ESG component in which they were served: SO, ES, RRH, or HP. ESG recipients and subrecipients must not set up CE projects in HMIS or upload CE comma-separated value (CSV) reports in Sage for purposes of the Consolidated Annual Performance and Evaluation Report (CAPER).

SO: Case Management

- Assisting an SO program participant to access the CE assessment process.
- Conducting an initial assessment of needs that has been standardized by the CE process.
- Conducting the CoC's standardized housing needs assessment.
- Referring an SO program participant to a community-based housing program using CE's uniform referral process.

ES: Case Management

- Assessing an ES program participant's housing needs with the CE standardized assessment tool.
- Facilitating an ES program participant's access to the referred housing placement determined by the CE process.

HP: Housing Stability Case Management

- Conducting the CE's standardized initial assessment for a household applying for HP assistance at a CE assess point for HP or a general CE access point.

RRH: Housing Stability Case Management

- Providing a program participant receiving RRH assistance with a referral using CE's uniform referral process.
- Conducting routine assessments for program participants to determine ongoing housing needs as part of a CE process that uses a progressive engagement strategy.

HMIS: General

- Entering ESG data into HMIS for CE when CE is integrated into the CoC's HMIS.

HMIS: Lead

- Customize or enhance the CoC's HMIS to integrate CE (recipients cannot fund this activity exclusively with ESG funding. Carefully document the costs and the rationale used to determine the amount allocable to ESG).

HMIS Project Setup and CAPER Reporting

ESG-funded activities that are carried out as part of the CoC's CE process must be set up in HMIS using only the project types available for the ESG program, which are explained in more detail in the [ESG Program HMIS Manual](#). All

-Q&A-

Question: I am an ESG RRH provider that is contributing ESG funds to our CoC's centralized hotline. Should I report this activity on the ESG CAPER as a CE project?

Answer: No. Consistent with HMIS project setup protocol, ESG recipients and subrecipients may not upload CE reports into Sage for the CAPER. Program participants referred to your RRH project by the CoC's centralized hotline should be reported, as they normally would be, on the CAPER under your RRH project.

possible project types that may be used for the ESG program are associated with an eligible ESG component (i.e., SO, ES, RRH, or HP). This means that ESG recipients and subrecipients may not use HMIS Project Type 14—Coordinated Entry since CE is not an eligible ESG component.

When an ESG project is doing initial assessments or other work in support of CE, ESG-funded staff may enter data into HMIS Data Standard element 4.19 Coordinated Entry Assessment and 4.20 Coordinated Entry Event.

These data elements must be accessible within HMIS to ESG staff and be completed for all program participants according to the HMIS workflow for the community.

Consistent with HMIS project setup protocol, ESG recipients and subrecipients may not upload CE CSV reports into Sage for the CAPER. The project type within the HMIS and uploaded in the CSV file in Q4 must match the project type

that the recipient identifies in the CAPER. See the [ESG CAPER Guidebook](#) for more information about using the correct project types for CAPER reporting in Sage.

Using ESG for CE—Scenarios

The following scenarios show how to correctly use ESG funding to support CE processes and collect ESG- and CE-related data. CE processes will differ across communities; if there are questions not addressed in these scenarios, please submit a question to the [HUD Exchange's Ask A Question \(AAQ\) desk](#).

Scenario 1	"Front-line" SO workers conduct CE housing assessments in unsheltered settings (e.g., parks, on the street) throughout a CoC that consists of three entitlement cities. One of the cities uses its ESG SO funds to pay for staff time to do assessments within its jurisdiction. The city bills this SO activity under Essential Services (Case Management). The SO workers record their assessment in data element 4.19 Coordinated Entry Assessment under their HMIS SO project as well as the results of the assessment (e.g., being placed on a priority list). When notified that a program participant has been approved for a permanent housing project, the SO staff enter that information into element 4.20 Coordinated Entry Event, under their ESG SO project in HMIS.
Scenario 2	A CoC's centralized CE project run by Nonprofit A is responsible for conducting housing assessments for permanent housing placements. An ESG recipient located within the CoC uses its ESG ES Essential Services (Transportation) funding to provide the shelter's program participants with bus tickets to access the centralized CE location for their assessment. Shelter staff enter only required ES data under their ES project in HMIS (i.e., no CE data). Nonprofit A (not funded by ESG), which conducts the housing assessments, enters CE data elements under the CoC's CE project in HMIS.
Scenario 3	An ESG-funded RRH project uses progressive engagement to determine how long David, a program participant, needs a housing subsidy. After the first month of rental assistance, the RRH staff complete ongoing housing needs assessments each month to determine if David still needs assistance to remain stably housed. While completing the assessment after his third month in the project, the RRH staff and David agree that he should be referred to a PSH project. Staff time used for the assessments are billed to ESG RRH Housing Stability Case Management. RRH staff document the following under their ESG RRH project in HMIS: 1) the Housing Needs Assessment in data element 4.19 Coordinated Entry Assessment and 2) the referral to PSH in data element 4.20 Coordinated Entry Event.
Scenario 4	The CoC's CE assessment team conducts a CE standardized assessment for Jill, a program participant staying in an ESG-funded emergency shelter, and determines that she should be placed on a prioritization list for RRH. Once Jill's placement in a local RRH project is available, a housing navigator employed by the emergency shelter begins working with Jill to identify an apartment. The navigator gives Jill a bus token to view a unit and assists her with completing the rental application. The emergency shelter bills the housing navigator's time as an eligible expense under ESG ES Essential Services (Case Management). Shelter staff enter only required ES data under their ES project in HMIS (i.e., no CE data). The CoC's CE assessment team (not funded by ESG), which conducted Jill's CE standardized assessment, completes the 4.19 Coordinated Entry Assessment and 4.20 Coordinated Entry Event data elements under the CoC's CE project in HMIS.

ESG Funds and Expanded CE Activities

ESG-CV funds and annual ESG funds designated to PPR can be used to pay for CE costs that have increased due to the coronavirus. The ESG-CV Notice allows CoCs to use ESG funds more flexibly to support activities that can be carried out to quickly prioritize and refer for assistance households experiencing and at-risk of homelessness through the CoC's CE. For example:

- Paying for additional staff for a centralized CE assessment center or a hotline system that screens and connects callers to homeless housing and service providers in the area. ESG-CV funds and annual ESG funds designated to PPR can fully cover these costs without prorating based on the number of program participants referred to ESG projects.

- Paying for a case manager whose responsibilities include collaborating with the CoC's CE entity to establish a streamlined process to support individuals and households on the prioritization list to access any documents they may need in the referral to the Public Housing Agency (PHA) for Emergency Housing Vouchers (EHVs). This could include assisting an individual or household in getting birth certificates, state-issued identification, or proof of income. An emergency shelter could bill the case manager's time as an eligible expense under ESG ES Essential Services (Case Management).
- Paying for a case manager in a Temporary Emergency Shelter project to provide essential services including housing search and placement services (under 24 CFR 576.105(b)(1)) and housing search and counseling services (under 24 CFR 578.53(e)(8)) for a household that has been referred through CE.

Expanded CE Activities

The ESG-CV Notice (see: Section III.E.3.k) waives limitations on eligible ESG activities to the extent necessary to use ESG-CV funds or annual ESG funds designated to PPR to pay for the additional costs needed to update, enhance, and operate the applicable CE system for PPR. The alternative requirements are:

- The cost documentation must show that the use of ESG-CV funds is limited to the increase in system costs due to COVID-19.
- The ESG recipient's use of funds for this activity must be coordinated with the applicable CoC to ensure that ESG-CV funding is used for the most critical CE needs.

Expanded CE activities funded with ESG should be budgeted in IDIS under the SO activity. For more information, refer to the [activity setup guidance](#) or submit a question to HUD Exchange's [AAQ portal](#).

Reminder: Annual ESG funds that are **not** designated to PPR **cannot** be used to pay for expanded CE costs.

The table below highlights differences in the ways ESG funds can be charged for CE based on the type of CE cost and whether or not the client is referred to an ESG project.

CE Project Refers...	CE Costs—Already Eligible under 24 CFR Part 576 <i>May be funded with ESG funding not designated to PPR, ESG-CV, and annual ESG designated to PPR</i>	Expanded CE Costs—Provided under ESG-CV Notice <i>May be funded only with ESG-CV and annual ESG designated to PPR</i>
...all clients to ESG-funded projects	ESG may fund up to 100% of the cost of the CE project	
...clients to a mix of ESG- and non-ESG-funded projects	ESG may fund a prorated amount of CE costs based on the percentage of clients entered into ESG-funded projects	ESG may fund up to 100% of the cost of the CE project with documentation that shows the use of ESG-CV funds is limited to the increase in system costs due to COVID-19
...all clients to non-ESG-funded projects	ESG funds may not be used to fund the cost of the CE project	

Using ESG to Support EHV Referrals

The EHV program is funded by the American Rescue Plan (ARP) and provides 70,000 housing vouchers through PHAs to assist people who are experiencing or at risk of homelessness; are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking; or recently experienced homelessness. [Notice PIH 2021-15](#) directs PHAs to accept referrals for EHV from the CoC's CE system.

ESG funding can assist CoCs in supporting the need for an efficient and effective referral system to PHAs with which they partner for the EHV program. CoCs and PHAs must collaborate to ensure the referral process through CE connects eligible individuals and households to EHV as quickly as possible. Communities can fund additional activities with ESG funds that expedite the referral process. Coordinating ESG-CV and EHV to Create Surge Capacity in Coordinated Entry Systems provides some specific examples on how this can be done, including paying for CE assessors, housing navigation, and housing stability case management.

Additional Resources

- [ESG Program Interim Rule](#) at 24 CFR Part 576
- [Notice CPD-17-01](#): Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System
- [ESG Program HMIS Manual](#)