

## **ESG-CV and Back@Home Q&A**

Updated 6/17/20

*This document answers questions as asked by community partners regarding the distribution and use of ESG-CV funds or the State's intent to use the Back@Home program infrastructure to ensure ESG-CV funds are used effectively and efficiently.*

### **How has NCDHHS considered how Back@Home or ESG-CV funds can be used to serve individuals with complex needs? Does this work have an equity lens?**

North Carolina is receiving a significant allocation of ESG-CV funding that, in partnership with CoCs, should be strategically used to respond to COVID-19 and end homelessness in North Carolina. This investment has the potential to help countless people exit homelessness and stay safer and healthier during the pandemic. ESG-CV funds must be appropriately targeted to meet the needs of the people we serve in an efficient and targeted way.

North Carolina is prioritizing Housing Stability, particularly Rapid Rehousing, to move individuals into permanent housing as quickly as possible. With the scale of resources in North Carolina, CoCs and Agencies should ensure that Housing Stability resources are available to all individuals that need it, according to community prioritization processes, including those with more complex needs.

People of color who experience homelessness, particularly African Americans, often have more complex problems as a result of having been the target of historic and systemic racism. As a result of discrimination, they have had disproportionate interaction with the criminal justice system, less access to quality health care, poorer health, less access to quality and healthful food, poorer educations, less job opportunity and advancement, etc.

Targeting people with lesser needs for homelessness prevention/eviction assistance can result in those with more complex problems going unserved and further perpetuate racial disparities in homelessness. To create an equitable system will require that systems work to quickly move all individuals, including those that have higher or more complex needs, into permanent housing as quickly as possible.

In addition, we are looking to frameworks put out from the National Alliance to End Homelessness and other partners on how to structure a homelessness response that promotes equity and will continue to incorporate their best practices in all parts of the overall ESG program and Back@Home model.

### **Can Back@Home be used to serve people experiencing homelessness who might need PSH?**

Yes. In the wake of COVID-19, it the State's priority to move people to permanent housing as quickly as possible in an efficient and targeted way. With the scale of resources in North Carolina, CoCs and Agencies should ensure that Housing Stability resources are available to all individuals that need it, according to community prioritization processes, including those with more complex needs.

Targeting people with lesser needs for homelessness prevention/eviction assistance can result in those with more complex problems going un-served and further perpetuate racial disparities in homelessness. Creating an equitable system will require that systems work to quickly move all individuals, including those that have higher or more complex needs, into permanent housing as quickly as possible. Individuals that do need additional supports can be moved to permanent supportive housing services and programs.

### **What does it mean if my CoC opts into the Back@Home model for our Housing Stability components of the grant?**

As the COVID-19 pandemic impacts North Carolina and more individuals in North Carolina communities require rapid rehousing and homelessness prevention services, it is critical that North Carolina ramps up capacity to serve the most people, in the fastest way, with the best outcomes statewide. Back@Home is a best practice model that provides infrastructure and support to agencies statewide. The model is aimed to support agencies that have both significant experience and expertise in Housing Stability activities and those that have limited experience and require additional support – and all agencies in between. To do this, the Back@Home model, offers: (1) Capacity & Support; (2) Efficiencies through Shared Infrastructure; (3) Additional Access; and (4) Data Systems to Show Collective Impact and Progress Toward Shared Goals.

For CoCs that opt into Back@Home, the CoC will still make a community decision around how they will allocate their funding to different program areas. Please see the Fair Share Explainer for more information on the Applications.

### **If my CoC opts into Back@Home, how will agencies be selected?**

The State's priority is to create statewide coverage of Agencies that are well resourced and have all technical assistance and supports needed to quickly ramp up services that follow best practices to respond to COVID-19. To that end, CoCs that do not opt out of Back@Home will direct all Agencies interested in applying for Housing Stability funding through ESG-CV to submit their Project Application directly to NCDHHS ESG Office.

COVID-19 response will require significant scaling of Housing Stability efforts. NCDHHS will prioritize Agencies that can quickly ramp up activities and efficiently operate at scale.

NCDHHS will aim to select Agencies that collectively cover all 100 counties (unless some counties are not participating through opt-out). Agencies are encouraged to consider applying across CoC regional lines to cover areas that may not have experienced Rehousing Agencies, if applicable. Agencies that are less experienced with Housing Stability Activities, but with Back@Home support, plan to quickly scale capacity to respond to COVID-19 may also apply.

### **If my CoC opts into Back@Home, might my CoC lose its Housing Stability funds to other larger or more urban CoCs?**

The goal of Back@Home is to build and grow capacity across all regions of North Carolina. To ensure that all regions have the Housing Stability resources needed to respond to COVID-19, NCDHHS will ensure through requisition data that regardless of whether Agencies span one or more CoCs, that the funding allocated by a CoC for Housing Stability is used to serve individuals and families within that CoC.

### **How long with the funding last?**

ESG-CV funds expire in September 2022.

### **What happens if Back@Home funding is promised to an individual, but those funds are no longer available? Is there a ramp-down process?**

From current guidance, CARES Act funding must be expended by September 2022. There will be a ramp down process toward the end of ESG-CV. Due to financial data controls in place, we would not anticipate that someone would be promised Housing Stability with no funding remaining. In the event that this does occur, we would work to transition the person to another program or identify alternative funding.

**Is the distribution of ESG-CV funds going to follow the same Fair Share distribution process as the currently NC ESG distribution?**

The first allocation of ESG-CV funds follows the same formula for distribution of funds as the FY19 ESG competition. Because HUD has changed the formula for the second round of funding, the formula for the second round may be modified. However, the formula will in no way be impacted by a CoC's decision on Back@Home.

**How does this plan allow CoCs to determine the best use of funding based on their unique community needs?**

CoCs will determine how funding should be distributed among eligible activities. CoCs will also determine if they will use the NCDHHS Back@Home Plan or choose to provide homelessness prevention and rapid rehousing activities through a local process.

The State will work collaboratively with Continuums of Care (CoCs) to provide funding to both current ESG subrecipients and new applicants that meet ESG program eligibility to perform activities that are crucial to preserving life and health and forward-looking activities that build a stronger, healthier, more effective homelessness and housing system in North Carolina. To that end, the State is prioritizing funding toward Housing Stability activities that can be quickly implemented to assist individuals and families living in unsheltered environments and those exiting congregate and non-congregate shelter sites to permanent housing.

As part of their Regional Application, CoCs may determine the amount of funding that goes to each eligible program activity. Due to the nature of COVID-19, NCDHHS requires that CoCs allocate a minimum of 60% of funding to Housing Stability activities. However, if a CoC determines that there is a greater need for Crisis Response (Emergency Shelter and Street Outreach) in their community and would like to allocate less than 60% of the available funding to Housing Stability activities, it may provide a letter of justification to NCDHHS for approval.

**It appears as though the data is entered into the HMIS@NCCEH system. If you are part of the NCHMIS implementation, what happens?**

ESG-CV funded agencies, whether participating in Back@Home or not, are required to enter data into the HMIS that has been selected by their CoC. Three CoCs use HMIS@NCCEH and nine CoCs use NC HMIS. Victim Service Providers are not allowed to enter data into HMIS and will be required to use an HMIS comparable database.

**Who will be overseeing the fiscal, administrative, and programmatic compliance of these new programs?**

NC DHHS ESG Office will be overseeing all parts of the program. There is additional oversight being provided by the Office of State Budget and Management and the Governor's Office to ensure the funds are used in coordination with other funds.

**It appears as the use of 211 requires recipients to circumvent their current coordinated entry process, is this true or how would this work within the various CoCs throughout the state.**

No, there is no intent to circumvent a CoC's current coordinated entry process. The plan envisions that 2-1-1 will be a statewide access point for homelessness prevention and rapid rehousing services. The team will work with each CoC that opts into Back@Home on that workflow to ensure that they are well integrated, does not interrupt current CE systems, and adds value.

**How is the State deciding how to use ESG-CV funding?**

NCDHHS is the recipient of ESG-CV funding and is responsible for determining how ESG-CV funds will be used to meet State priorities and goals. NCDHHS charged the North Carolina Interagency Council on Coordinating Homelessness to create a plan to respond to COVID-19.

NCDHHS has taken some of the concepts included in the ICCHP Plan and is using them to create a plan for ESG-CV spending. NCDHHS is the recipient of HUD ESG funds and thus responsible for the planning and dissemination of ESG-CV funds. There is additional oversight being provided by the Office of State Budget and Management and the Governor's Office to ensure the funds are used in coordination with other funds.

**Does one agency have to serve the entire state?**

There will be multiple agencies selected to serve as Back@Home Rehousing Agencies. NCDHHS will work to ensure Back@Home is available in every county that does not opt out.

**Will 2-1-1 be entering data directly into our HMIS?**

This has not been decided. Several options for referral are being discussed and will be brought to CoCs who opt in to Back@Home for input and decisions.

**Will the funds to pay for 2-1-1 and coaching come out of the ESG-CV funds as well?**

At this time, the plan is to use other funding for 2-1-1 and ESG-CV admin dollars will be used for program infrastructure support such as technical assistance and training.

**The draft plan/letter to HUD state that NCDHHS will “determine” which comparable database DV/DDV/SA agencies utilize. Will NCDHHS make sure of a particular comparable database a requirement if a DV agency seeks ESG-CV funds?**

Victim Service Provider Agencies that receive ESG-CV dollars are required to use an HMIS-comparable database. The VSP Agency may choose which database is utilized, provided it can produce the required CAPER report.

**Since those that opt into B@H with DHHS, does this mean that DHHS is also subsequently going to have to apply for those ESG dollars through the ESG Office as well?**

No. NCDHHS is the ESG recipient, not the ESG Office. The ESG Office is not an entity, it is a program housed within NCDHHS. NCDHHS has created a plan for ESG-CV and part of the plan is to use the funding to provide standardization, oversight, and improved practice of the use of ESG-CV funding for Homelessness Prevention and Rapid Rehousing activities. The Back@Home model is one technique to do that.

**When the time comes to release the RFA, will there be coordination with the CoC in each area? If so, what will that look like?**

Each CoC will determine the amount of their funding allocation will be spent on each ESG eligible activity within the parameters and prioritizations set by the State. NCDHHS ESG Office and its partners will coordinate with all CoCs throughout the application period, as needed to provide clarification or answer questions, and after the application process. CoCs that opt into Back@Home will work with the team on how 2-1-1 and other Back@Home infrastructure can support and/or be aligned existing infrastructure. ESG, for example, will work on a workflow specific to each CoC's Coordinated Entry process. Back@Home is just a model that allows communities and agencies to efficiently scale with additional supports and infrastructure. Feedback over time will continue to shape the project.

**Could this plan cause confusion for people experiencing homelessness?**

The model attempts to reduce confusion by having a shared “front door” across communities that is well coordinated with local community entries. It is also meant to identify and grow agency capacity that can both provide coverage for housing stability activities statewide and can scale to meet the growing need to respond to COVID-19.

**How are various partners involved with implementation?**

The ESG-CV Program is administered by NCDHHS ESG Office. Some aspects of the implementation will be supported by other agencies. The NC Housing Finance Agency has built a requisition portal that is the planned tool for some or all ESG-CV requisitions. In addition, NCHFA adds their experience on landlord engagement, inspections and other practices. The North Carolina Coalition to End Homelessness, in their role as a statewide advocacy agency and partner, will provide some of the technical assistance for agencies in Back@Home through their staff and national partners.

**This proposed change, indicates an RFP handled by DHHS or NCEEH to apply for funding, is this accurate?**

The RFA will be managed by the NCDHHS ESG Office. The RFA will be similar to traditional ESG processes, with the additional opportunity for CoCs to opt into Back@Home.

**Could you clarify if this draft pertains to the 2nd round of CARES funding, since it states that non-ESG agencies can apply.**

The Fair Share Allocation Letter that went out on Monday is for the first round of ESG funding. Both rounds of funding are open to current ESG grantees and eligible organizations that are not current ESG grantees.

**Technical Assistance from HUD was requested by whom, when and what was the scope of work the TA covered?**

Technical Assistance from HUD was requested by NCDHHS in April. NCDHHS was looking for assistance in creating a strategic approach to responding to COVID-19 with HUD funding.

**Letter to Norm Suchar states that NCDHHS will do the RFA for COVID funds- not NCCEH as indicated on the QA call and eluded to on the draft plan. Who is responsible for the RFA and who determines agency eligibility?**

All Applications and awards will go through NCDHHS. The ESG-CV Program will be administered by NCDHHS ESG Office. There has never been a plan for NCCEH to oversee the RFA. NCCEH, in its role as a statewide advocacy organization, has supported the Back@Home-Florence Program, and may also support the technical assistance in Back@Home-CV.

**Letter to Norm Suchar states Back@Home covers “Regions” not CoCs. How will that intersect with local CE process and Written Standards?**

NCDHHS ESG Office will work with all CoCs that use Back@Home on Coordinated Entry workflow to ensure that any Back@Home processes are well integrated, does not interrupt current CE systems, and adds value.

**Letter to Norm Suchar states Back@Home “implemented consistently across geographies” which does not allow for CoC local prioritization, CE, or Written Standards. Please explain how this is consistent with HUD regulations.**

A Back@Home model aims to share best practices and access across the State. Local CE and Written Standards will be maintained. Local prioritization will also be a part of the total program prioritization.

**NCHFA Portal- was put together for FEMA Back@Home. Does this platform comport with HIPAA- is it HMIS compatible? Will data sharing agreements will be required by Back@Home and local CoC’s for data sharing? How is this plan more efficient- would this not require additional and or duplicative data entry by agencies?**

The NCHFA Portal was created in 2018 to support Back@Home-Florence for financial management and compliance purposes. It was not shared or integrated with a FEMA Program. The Portal allowed for an efficient requisition system, which is separate from HMIS. The Portal leverages HMIS by utilizing an HMIS Household ID to limit dual data entry to the greatest extent possible. Only requisition data is submitted to the NCHFA portal. The portal allows for an efficient, electronic way to upload and track documentation, allows for more efficient monitoring, and gives the State better data on spend. The information in the portal is not covered by HIPAA.

**HQS rather than ‘minimum habitability’ standards of ESG regulation. Why?**

HQS is required for public housing voucher and other programs and was determined a best practice to ensure that households are moved into safe and healthy housing while ensuring the household can change to another voucher program. While inspections were arranged within 24 – 48 hours on households, sometimes the household and/or landlord needed to move faster to avoid losing a unit. In those cases, case managers may provide a habitability check on housing and arrange for an inspection after a household moves in.

**Smartsheet for byname list. Essentially, this appears to function as a state wide by-name master list. What would happen with the local/CoC by-name list? How would the Smartsheet intersect CoC by-name list? Smartsheets is owned and managed by NCCEH, not every CoC can allow NCCEH to house their data.**

After further discussion about technology options and ability to scale up, it is not anticipated Smartsheet will be used for a by-name list for this program.

**Data reported by County, not by CoC. What about CoCs that have multiple counties in their CoC’s geographic area? How will data be recorded if the Back@Home agency crosses CoC boundaries who have different HMIS Implementations – currently WellSky has been unable to utilize its own SharePoint module used to share data.**

Rehousing Agencies will have designated counties that they serve. Rehousing Agencies will be responsible for entering data into the HMIS that is selected by the county (CoC) served. When data can be reported by a county, it can also be reported at a CoC level by grouping the appropriate counties together. The data element utilized in HMIS to enable reporting at a county level is “county of service”.

**Is 211 taking over case management and Diversion thru 211 staff statewide?**

No, 2-1-1 is not taking over case management and diversion. 2-1-1 is an access point to determine eligibility and can divert individuals and families that are ineligible for services. It will allow CoCs CE or diversion projects to focus on households that they were designed to serve.

**How effective can the 211 system be for the person seeking assistance and the community, if there is no 211 system near the CoC region? Eventually the work of housing the person in need falls to the local community resources, so it seems like the current systems in place would reduce the layers that often become barriers for clients.**

2-1-1 is a statewide call center and is not located in specific CoC regions. 2-1-1 is meant to take some responsibilities off case managers at Agencies to create efficiencies. Case managers, once working with a client, will be responsible for connecting individuals to local community resources.

**Will NCHFA be handling all draws/reimbursement for Back@Home providers? What is the average lead time for the process for a provider to get reimbursement?**

NCHFA will do the initial review for completion and eligibility of all requisitions that come into the portal. NCDHHS will review these for eligibility and submit for payment. If requisitions are complete, NCDHHS expects to clear all requisitions as soon as possible and within 30 business days. NCDHHS is currently considering using the NCHFA portal for all homelessness prevention and rapid rehousing activities, whether the CoC is participating in Back@Home or not.

**Will NCCEH be the subrecipient/program support responsible for monitoring or will DHHS?**

No. NCDHHS is administering the program and will be responsible for all oversight and monitoring.

**Will all applications go directly to DHHS and Back @Home, with an opt out, or will that decision be determined ahead through the local CoC and a different process take place? If the decision is to opt out, is the application for funding and subsequent award still handled through DHHS or ESG, along with grant oversight?**

No, only Housing Stability applications will be sent directly to DHHS/ESG Office if a CoC participates in Back@Home. If a CoC opts of Back@Home, the CoC will determine the level of funding to recommend for each RRH/HP project and the project applications will be sent to NCDHHS for threshold review. More specifically, as described in the Fair Share Allocation letter:

1. Regional Application: In this application, CoCs will prioritize funding among the ESG eligible categories and recommend Projects that should be funded to NCDHHS.
2. Crisis Response Project Applications: All applicants that request funding for Crisis Response activities must submit a Crisis Response Project Application to their CoC for review. The CoC will select projects that meet the needs of their community and recommend funding amounts that are within their ESG-CV grant allocation to NCDHHS for final decision and award.
3. Housing Stability Project Applications: All applicants that request funding for Housing Stability activities must submit a Housing Stability Project Application.
  - a. If the CoC is participating in the Back@Home model, the agency will submit their application, with a letter of support from their CoC, directly to NCDHHS for review and selection. Agencies will be selected through a competitive process.
  - b. If the CoC is NOT participating in the Back@Home model, the agency will submit their application to their CoC for review. The CoC will select projects that meet the needs of their community and recommend funding amounts that are within their ESG-CV grant allocation to NCDHHS for final decision and award.

4. CoCs that wish to spend more than 40% of their allocation on Crisis Response activities and/or opt out of the Back@Home model must submit a letter of justification to NCDHHS for review. The letter of justification should describe the community process used to make the decision.

**NCDHHS “charged” ICCHP to create a plan? When did this occur and how was this charge communicated? Creation of a plan is vastly different than imposing or implementing a statewide plan, when was this authority conveyed to ICCHP and removed from the NC ESG Office?**

NCDHHS charged the ICCHP to create a statewide plan for COVID-19 Housing Response and Recovery. This includes, but is not limited to, the State’s approach for non-congregate sheltering, eviction prevention, and eligible ESG activities: street outreach, emergency shelter, rapid rehousing and homelessness prevention. Because there is funding from various sources and Departments, it was important to create an overarching framework and plan.

The plan was put out to stakeholders as well as sent to HUD for approval, which was received. No authority was removed from the NC ESG Office, which is still administering the ESG-CV funds, which include the Back@Home model components.

**Who is on the ICCHP? Please provide a copy of the minutes and vote on the approval of the draft plan by ICCHP and the membership.**

The Interagency Council for Coordinating Homeless Programs (ICCHP) is an advisory group created to advise the Governor and the Secretary of the North Carolina Department of Health and Human Services on issues affecting persons who are homeless or at risk of becoming homeless. More information on the ICCHP can be found [here](#).

The ICCHP created opportunities for members of the ICCHP and stakeholders that are not members to participate in a COVID-19 workgroup. CoC staff and other local leadership have been involved through email and weekly calls. In addition, NCCEH convenes a call with CoCs and other stakeholder weekly. ICCHP workgroup updates have been announced on these calls each week.

As this is not the final ICCHP plan, there are no minutes and vote to provide at this time. NCDHHS has taken some of the concepts included in the ICCHP Plan and are using them to create a plan for ESG-CV spending. NCDHHS is the recipient of HUD ESG funds and thus responsible for the planning and dissemination of ESG-CV funds. There is additional oversight being provided by the Office of State Budget and Management and the Governor’s Office to ensure the funds are used in coordination with other funds.