

State of Mississippi  
Plan to Carry Out  
Emergency Solutions Grant  
Activities Authorized by  
Coronavirus Aid, Relief, and Economic Security  
Act (CARES Act)

**Mississippi Home Corporation  
is accepting comments from the public on this Plan  
through 5:00 pm March 2, 2021**

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## OBJECTIVES

The Emergency Solutions Grant COVID-19 (ESG-COVID) program funds services to prevent, prepare for, and respond to the coronavirus pandemic (COVID-19). Individuals and families who are homeless or receiving homeless assistance are eligible. As of the date of this notice, federal moratoriums on eviction prevent use of ESG funds for homelessness prevention.

## BACKGROUND

President Trump signed the CARES Act on March 27, 2020 to help the Nation respond to the coronavirus outbreak. The CARES Act made available an additional \$4 billion in ESGCV funds to supplement the Fiscal Year (FY) 2020 ESG funding provided under the Further Consolidated Appropriations Act, 2020 (Public Law 116-94). Mississippi has received \$8,171,221 in ESG-CV1 and \$10,423,120 in ESG-CV2.

Mississippi Home Corporation (MHC) administers the Emergency Solutions Grant for the State of Mississippi and is responsible for administering the ESG-COVID program. The purposes of this document are as follows:

1. Describe how Mississippi will use ESG-CV2 funds.
2. Identify eligible activities.
3. Announce how entities will be selected to administer the funds in the state.
4. Establishes that the same financial control procedures, forms, and documentation used to administer the ESG program will be used to manage the disbursement of ESG-COVID funds.

HUD's allocation notes the ESG-CV funds are subject to the following flexibilities and conditions provided by the CARES Act:

1. The funds may be used to cover or reimburse allowable costs incurred by a State or locality before the award of funding (including prior to the signing of the CARES Act) to prevent, prepare for, and respond to COVID-19;
2. The funds are not subject to the spending cap on emergency shelter and outreach under 24 CFR 576.100(b)(1);
3. Up to 10 percent of funds may be used for administrative costs, as opposed to 7.5 percent as provided by 24 CFR 576.108(a);
4. The funds are exempt from the ESG match requirements, including 24 CFR 576.201;
5. The funds are not subject to the consultation and citizen participation requirements that otherwise apply to the Emergency Solutions Grants, however each recipient must publish how its allocation has and will be used, at a minimum, on the Internet at the appropriate Government web site or through other electronic media;
6. The funds may be used to provide homelessness prevention assistance (as authorized under 24 CFR 576.103 or subsequent HUD notices) to any individual or family who does not have income higher than HUD's Very Low-Income Limit for the area and meets the criteria in paragraphs (1)(ii) and (1)(iii) of the "at risk of homelessness" definition in 24 CFR 576.3;
7. That recipients may deviate from applicable procurement standards when using these funds to procure goods and services to prevent, prepare for, and respond to coronavirus, notwithstanding 24 CFR 576.407(f) and 2 CFR 200.317-200.326;
8. Grantees are encouraged to offer treatment and supportive services when necessary to assist vulnerable homeless populations, but individuals and families experiencing homelessness cannot be required to receive treatment or perform any other prerequisite activities as a condition for receiving shelter, housing, or other services for which these funds are used, notwithstanding 24 CFR 576.401(e).

The Act authorizes the Secretary to grant waivers of and specify alternative requirements for statutes and regulations the Secretary administers in connection with the use of ESG funds (except for requirements related to fair housing, nondiscrimination, labor standards, and the environment). These waivers and alternative requirements can be issued when necessary to expedite and facilitate the use of funds to prevent, prepare for, and respond to coronavirus. Mississippi intends to request all waivers available to it in order to provide flexibility to the state and administering entities in carrying out the program.

## GOALS for Mississippi ESG-COVID CV2 Funds

Goal 1: Unsheltered – Outreach to those living on the streets and in encampments

1. Persons in Mississippi's homeless population at risk of exposure to COVID-19.
2. Connect individuals with local Health clinics
3. Establish a bridge to care for individuals who have contracted COVID-19 or who have health conditions increasing their vulnerability to COVID-19.

Goal 2: Emergency Assistance to the Unsheltered – provide areas to isolate those that have contracted or may be exposed to the virus

1. Renovation/Major Rehabilitation and Conversion of facilities for non-congregate shelter connected with supportive services for residents

2. Hotel/Motel stays (up to 60 days)
3. Medical Case Management
4. Transportation
5. Train staff to identify symptoms of COVID-19
6. Personal Protective Equipment for service personnel

Goal 3: Rapid Rehousing – provide housing to the homeless

1. House Individual using the Housing First Model
2. Case Management/Wrap around services

Goal 4: Homeless Prevention – assist individuals at risk of becoming homeless

1. Federal eviction moratoriums prevent use of, ESG-CV funds for Homeless Prevention Activities
9. If eviction moratoriums are lifted or HUD guidance changes, funds may be used for:
  1. Individuals who have lost employment or income due to business layoffs.
  2. Coordinate with financial assistance, food assistance, and service providers, such as Mississippi Department of Employment Security (MDES), Community Mental Health Centers (CMHCs).
  3. Case Management/Wrap around services

### **Program Delivery**

MHC will solicit proposals from currently funded ESG-CV providers and other eligible entities to administer activities proposed for ESG-CV2 funds.

MHC will select providers to administer ESG-CV2 services using the following factors:

1. Collaboration: Activities must be tightly integrated with the appropriate CoC coordinated entry system serving the project area. The coordinated entry system enables homeless service providers or any organization that are members of the CoC to make referrals through the coordinated entry system of individuals who need support available under the ESG-COVID program.
2. Financial Information:
  - a Financial controls
  - b Budgeting priorities, ability to effectively use additional funds quickly.
  - c Organizational financial capacity, other funds supporting operation.
3. Proposed Outcomes:
  - a Demonstrated need based on current available data
  - b .How proposed activities address the need.
  - c Geographical coverage, ensuring services are available statewide.
  - d Current projections of the impact of COVID on the homeless populations in areas to be served by a proposed provider. This will enable funds to be scaled to the at-risk populations.
4. Reporting: Capacity to report in forms and on schedule required by HUD.
5. Flexibility: Because of the fast-evolving nature of the pandemic and the uncertainty about how it will present itself locally across the state and over time, MHC expects to permit providers allocated ESG-CV2 funds to adjust activities as needed to address evolving needs. MHC will reserve funds to be allocated in coming months to preserve flexibility while ensuring the state plan responds to demonstrated need.

MHC will allocate funds as follows:

1. State Administration \$1,042,312
2. Program \$9,380,808
  - a. MHC will allocate \$2,000,000 for rehabilitation of up to four facilities to provide non-congregate shelter services.
  - b. MHC will allocate \$5,380,808 to eligible services.
  - c. MHC will reserve \$2,000,000 to be allocated to agencies based on utilization of initial funds, and emerging information about need in local service areas. Administering agencies will be required to support requests for additional funds with information on utilization, current and expected needs, and recipient outcomes achieved with the initial allocation.
3. The State may adjust funding amounts awarded from the amounts stated in order to accommodate projects and activities proposed by eligible entities.

## ESG-COVID Eligible Activities

### Administration

Mississippi will fund activities authorized by Federal ESG statute and HUD guidance. Mississippi will not fund Homelessness Prevention unless while federal eviction moratorium is in place or until HUD guidance changes on using ESG-CV during federal eviction moratoriums.

Entities awarded ESG-CV2 funds may provide the following activities:

<b>Component: Street Outreach.</b> These activities are designed to meet the immediate needs of Unsheltered homeless people by connecting them with emergency shelter, housing, and/or critical Health services. CFR §576.101	
<b>Activity type: Essential Services</b>	
Eligible Costs:	
<ul style="list-style-type: none"> <li>Engagement</li> <li>Case Management</li> <li>Emergency Health Services</li> </ul>	<ul style="list-style-type: none"> <li>Emergency Mental Health Services</li> <li>Transportation</li> <li>Services for Special Populations</li> </ul>

<b>Component: Emergency Shelter.</b> These activities are designed to increase the quantity and quality of temporary shelters provided to homeless people, through the renovation of existing shelters or conversion of buildings to shelters, paying for the operating costs of shelters, and providing essential services. CFR §576.102			
<b>Activity types:</b>			
Essential Services	Renovation (also includes Major Rehab and Conversion)	Shelter Operations	Assistance Required Under the Uniform Relocation and Real Property Acquisition Act of 1970 (URA)
Eligible costs: <ul style="list-style-type: none"> <li>Case management</li> <li>Child Care</li> <li>Education Services</li> <li>Employment Assistance and Job Training</li> <li>Outpatient Health Services</li> <li>Legal Services</li> <li>Life Skills Training</li> <li>Mental Health Services</li> <li>Substance Abuse Treatment Services</li> <li>Transportation</li> <li>Services for Special Populations</li> </ul>	Eligible costs: <ul style="list-style-type: none"> <li>Labor</li> <li>Materials</li> <li>Tools</li> <li>Other costs for renovation (including rehab or conversion)</li> </ul>	Eligible costs: <ul style="list-style-type: none"> <li>Maintenance</li> <li>Rent</li> <li>Security</li> <li>Fuel</li> <li>Equipment</li> <li>Insurance</li> <li>Utilities</li> <li>Food</li> <li>Furnishings</li> <li>Supplies necessary for shelter operation</li> <li>Hotel/Motel Vouchers</li> </ul>	Eligible costs: <ul style="list-style-type: none"> <li>Relocation payments</li> <li>Other assistance to displaced persons</li> </ul>

<b>Component: Rapid Re-Housing.</b> These activities are designed to move homeless people quickly to permanent housing through housing relocation and stabilization services and short-and/or medium-term rental assistance. CFR §576.104		
<b>Activity types:</b>		
Rental Assistance	Housing Relocation and Stabilization Services	
Eligible costs: <ul style="list-style-type: none"> <li>Short-term rental assistance</li> <li>Medium-term rental assistance</li> <li>Rental arrears**</li> <li>Rental assistance can be project-based or tenant-based.</li> </ul>	Financial Assistance	Services Costs
	Eligible costs: <ul style="list-style-type: none"> <li>Rental Application Fees</li> <li>Security Deposits</li> <li>Last Month's Rent</li> <li>Utility Deposits</li> <li>Utility Payments</li> <li>Moving Costs</li> </ul>	Eligible costs: <ul style="list-style-type: none"> <li>Housing Search and Placement</li> <li>Housing Stability Case Management</li> <li>Mediation</li> <li>Legal Services</li> <li>Credit Repair</li> </ul>

**HMIS Component. These activities are designed to fund ESG recipients' and subrecipients' Participation in the HMIS collection and analyses of data on individuals and families who are homeless and at-risk of homelessness. CFR §576.107**

**Activity type: HMIS**

Eligible costs:

- Contributing data to the HMIS designated by the CoC for the area;
- HMIS Lead (as designated by the CoC) costs for managing the HMIS system;
- Victim services or legal services provider costs to establish and operate a comparable database.

**Administrative Activities. Administration is not a component, it is considered an activity. CFR §576.108**

Eligible costs are broadly categorized as follows:

- General management, oversight, and coordination
- Training on ESG requirements
- Consolidated Plan
- Environmental review

Considerations in using ESG-CV funds:

1. Refer to the program regulations at 24 CFR Part 576 for complete information about all eligible costs and program requirements.
2. Documentation that may be required to support determination of COVID impact:
  - a. Statement from hospital stating "client is/was under care" due to COVID-19 Unsheltered those who HAVE tested positive but don't require hospitalization.
  - b. Individuals who have lost their jobs due to COVID-19 will submit Unemployment Claim or letter from individuals job stating they are out of work due to COVID-19.
3. Consideration for individuals who require isolations so that they don't spread the virus. Average hotel stay for the isolation period and rental assistance search is between 30-60 days. Individuals in isolation require their own staff to limit exposure to the non-infected population.

### **ESG COVID-19 Cash Request and Performance Monitoring**

All activities must be completed, and project funding disbursed by September 30, 2022. Payment for services, documentation of activities performed, and cash request procedures for reimbursement will follow the same procedures as the regular ESG funding. Administering agencies will submit documentation on persons served with requests for reimbursement. MHC will require performance metrics to be submitted quarterly following HUD guidance. MHC will also require basic program metrics on a bi-weekly basis. MHC will use this information to ensure funds are having a measurable impact on the health and housing stability of the homeless and at-risk population. Performance metrics will be used to monitor cost of delivery and effectiveness in serving the target population and inform the need for changes in the activities being funded and geographical targeting of the reserved funds. MHC will also use this information to make decisions regarding how the balance of funds will be released to eligible entities.