



EMERGENCY SOLUTIONS GRANT

STREET OUTREACH AWARD MANUAL

ESG STREET OUTREACH AWARD MANUAL TABLE OF CONTENTS

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Chapter 1

PROGRAM OBJECTIVES

On May 20, 2009, the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009 was passed into law, which amended and reauthorized the McKinney-Vento Homeless Assistance Act. The Emergency Solutions Grant (ESG) program is one of the primary McKinney-Vento Act programs affected by the HEARTH Act. HUD released interim regulations for ESG in December 2011 for fiscal year 2012 and the 2nd round of fiscal year 2011 ESG funding.

- A change of name to Emergency Solutions Grant (formerly Emergency Shelter Grant)
- Greater focus on program performance
- Expansion of the definition of homelessness and chronic homelessness
- Increased emphasis on prevention/rapid re-housing

The ESG Program is a formula grant allocated according to population and other demographic factors to eligible jurisdictions nationwide. IHCD is the designated recipient for ESG funds directed to the State of Indiana.

As a result of HEARTH Act changes, IHCD has created three separate ESG programs, the ESG Shelter Program, the ESG Rapid Re-housing/Homeless Prevention program, and the ESG Outreach Program.

The objectives of the ESG Outreach program are:

- to increase access and connection to services for people who are living unsheltered, on the streets;
- to provide urgent, non-facility based care to people who are unsheltered who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility

ESG funds assist in providing outreach, shelter and services for the homeless but also aid in the transition of individuals and families to permanent housing. Supplemental rapid re-housing funds (financial assistance and services) aid in this transition.

The ESG program is designed as the first step in the continuum of assistance to prevent homelessness and to support people experiencing homelessness in moving steadily toward independent living. The Continuum of Care model is based on the understanding that homelessness is not caused by simply a lack of shelter, but involves a variety of underlying needs. The fundamental components of a Continuum of Care system are:

- Outreach and assessment to identify homeless person's needs;
- Immediate shelter as a safe, decent alternative to the streets;
- Rapidly re-housing homeless persons into permanent housing or permanent supportive housing for the disabled homeless, following a "housing first" mentality.

Chapter 2

PROGRAM REQUIREMENTS

This section describes the basic program requirements and responsibilities under the ESG program. Sub-recipients of ESG funding are responsible for demonstrating compliance with all of the program requirements and the ESG and HEARTH Regulations at 24 CFR Parts 91 and 576.

1) Creating and maintaining a Program Operations Manual

Sub-recipients are required to create and maintain an operations manual that details program and contract expectations for staff and volunteers. The operations manual should include program specific rules, and expectations as outlined in this manual.

2) Keeping Accurate Financial and Service Delivery Records

Maintaining accurate records is an important aspect of management of ESG projects. Measurement of project performance relies on the tracking of information about services and activities. Sufficient records must be established and maintained to enable the sub-recipient to show that ESG requirements are being met. Therefore, it is important that accurate information and documentation regarding program activities and services provided with ESG funds is gathered and maintained. IHEDA requires consistent reporting on expenditure of funds, program activities and measurable outcomes. In order to report fully on program outcomes and activities, sub-recipients should consistently gather demographic information on the population being served by the ESG program and consistently report the types of activities being provided to participants.

ESG regulations require that records be maintained for a period of at least five years after the end of the grant term.

3) Documentation of Homelessness

Maintaining documentation of each participants' homeless status is an extremely important aspect of ESG project management. ESG sub-recipients are required to obtain and maintain adequate documentation of the evidence used by the sub-recipient to establish and verify the homeless status of persons being served. Written, dated and signed documentation of homeless status must be maintained in each participant's file.

The order of preference for documentation to demonstrate homelessness status is as follows:

1. Third-party documentation (obtained from another service provider or Third-party who is aware of the households living situation.)
2. Intake worker observations
3. Self-declaration

When third-party or intake worker observation documentation is not obtainable sub-recipient must provide a record of due-diligence and the steps that were taken in attempting to obtain that level of verification. Maintain the record of due-diligence with the self-declaration form in the participant file.

Lack of third-party documentation must not prevent the household from being immediately admitted to an emergency shelter, receiving street outreach services or receiving services provided by a victim service provider.

If the Head of Household is unable to provide a written self-declaration the sub-recipient staff member is encouraged to write down the Head of Household's personal account and document it on the form.

The Participant Eligibility Worksheet (HUD Homeless Documentation form) was created for use as a guide for proper documentation of homelessness. It is not required that this specific form be used, however the form that the sub-recipient uses must document from where the participant was referred, what third-party verification was obtained, when possible, and must include a space for client and sub-recipient staff signatures. The Participant Eligibility Worksheet (HUD homeless documentation form) can be obtained by the ESG Analyst.

ESG Street Outreach funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. The term "unsheltered homeless people" means individuals and families who qualify as homeless under paragraph (1)(i) of the "homeless" definition under 24 CFR 576.2 listed below.

An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground.

4) Termination of Participation and Grievance Procedure

It is important that sub-recipients effectively communicate termination and grievance procedures to participants and ensure that the procedures are fully understood.

If a participant violates ESG program requirements, the sub-recipient may terminate the assistance in accordance with a formal process established by the sub-recipient that recognizes the rights of individuals affected. The sub-recipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a participant's assistance is terminated only in the most severe cases.

Sub-recipients must have in place a procedure that governs the termination and grievance process. These procedures should describe the program requirements and the termination process, as well as the grievance procedure that might, for example, allow participants to request a hearing regarding the termination of their assistance.

Termination does not bar the sub-recipient from providing further assistance at a later date to the same family or individual.

3) Participation of Homeless Persons

- A. Sub recipient must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policy- making entity of the sub-recipient, to the extent that the entity considers and makes policies and decisions regarding any facilities, services, or other assistance that receive funding under Emergency Solutions Grant (ESG).
- B. If the sub-recipient is unable to meet requirement under paragraph (a), it must instead develop and implement a plan to consult with homeless or formerly homeless individuals in considering and making policies and decisions regarding any facilities, services, or other assistance that receive funding under Emergency Solutions Grant (ESG). The plan must be included in the annual action plan required under 24 CFR 91.220.
- C. To the maximum extent practicable, the Sub-recipient must involve homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under ESG, in providing services assisted under ESG, and in providing services for occupants of facilities assisted under ESG. This involvement may include employment or volunteer services.

4) Ensuring Confidentiality

To ensure the safety and security of ESG project participants fleeing domestic violence situations, ESG sub-recipients are required to develop and implement procedures to guarantee the confidentiality of records concerning project participants. In addition, the address and location of family violence shelter facilities receiving ESG funding may not be publicly disclosed except with the written authorization of the person(s) responsible for the shelter facility's operation. To comply with this requirement, sub-recipient organizations should, for example, keep written records or files pertaining to families under lock and key with only particular personnel granted access to those files.

5) Sanctions for Noncompliance

If it is determined that a sub-recipient is not complying with the requirements of the ESG regulations or other applicable Federal laws, IHCDCA may apply one or more of a variety of sanctions on the sub-recipient. These include but are not limited to requiring that previously committed ESG funds are returned or the determination to not provide future grant funding to the sub-recipient.

6) Participation in Regional Planning Council

- A. HUD recognizes 2 Continuums of Care (CoC) in State of Indiana:
 - 1. Balance Of State
 - 2. Indianapolis
- B. **Balance of State CoC**
 - Governed by **CoC Board** (bi-monthly at IHCDCA)
 - <https://www.in.gov/ihcda/indiana-balance-of-state-continuum-of-care/>
 - Semi-Annual General Membership Meetings (at IHCDCA)
- C. **Regional Planning Councils (RPC)** (16 total).
RPC structures reflects local planning priorities and is a regionally-based homeless assistance programs planning group
- D. **Goals:** Coordinate efforts of identifying needs of local homeless populations (rental assistance, education and services, permanent supportive housing, affordable housing; gaps in services, and identify the resources needed to fill gaps and strategies to obtain them.)

All sub-recipients must attend a minimum of 75% of local regional planning council meetings annually (formerly known as local continuum of care meetings) to remain eligible to receive ESG funds. Regional Planning Council information can be found on the Indiana Balance of State Website: <https://www.in.gov/ihcda/indiana-balance-of-state-continuum-of-care/>

New IHCDA Re-Allocation Policy

There is no guarantee of the availability of re-allocated Emergency Solutions Grant (ESG) funds. However, HUD allows for unspent ESG funds to be reallocated as needed wherever necessary.

- The re-allocated funds will be given to the top spender(s) from the first half of the grant cycle (July 1 – December 31).
- All organizations wishing to receive funds must also be able to match the additional ESG funds at 100%.

Eligibility to receive additional funds from unspent money at the end of the award year will be determined as follows:

- Organizations who run out of funds early (not enough funds to file 12 claims per year) will be offered the funds first based on the percentage of award available (20% for Shelter and Outreach, 25% for RRH/HP).
- The process will continue to the next organization spending prior to the end of the award until all funds are re-allocated.
- Additional funds will be awarded based on the ability to match 100% of funds and spend within 1-3 months of receipt of funds. ***Time frame on spending subject to change.**

ELIGIBLE ACTIVITIES

There are six (6) eligible activities under the ESG Outreach program:

1. **Engagement**
2. **Case Management**
3. **Emergency Health Services**
4. **Emergency Mental Health Services**
5. **Transportation**
6. **Services for Special Populations**

1. **Engagement-** The costs of activities to locate, identify, and build relationships with unsheltered homeless people and engage them for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs. These activities consist of making an initial assessment of needs and eligibility; providing crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; and actively connecting and providing information and referrals to programs targeted to homeless people and mainstream social services and housing programs, including emergency shelter, transitional housing, community-based services, permanent supportive housing, and rapid re-housing programs. Eligible costs include the cell phone costs of outreach workers during the performance of these activities.
2. **Case Management-** The cost of assessing housing and service needs, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant. Eligible services and activities are as follows: using the centralized or coordinated assessment system as required under § 576.400(d); conducting the initial evaluation required under § 576.401(a), including verifying and documenting eligibility; counseling; developing, securing and coordinating services; obtaining Federal, State, and local benefits; monitoring and evaluating program participant progress; providing information and referrals to other providers; and developing an individualized housing and service plan, including planning a path to permanent housing stability.
3. **Emergency Health Services-** (i) Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals operating in community-based settings, including streets, parks, and other places where unsheltered homeless people are living.
 - (ii) ESG funds may be used only for these services to the extent that other appropriate health services are inaccessible or unavailable within the area.
 - (iii) Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate emergency medical treatment; and providing medication and follow-up services.
4. **Emergency Mental Health Services-** (i) Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions operating in community-based settings, including streets, parks, and other places where unsheltered people are living.
 - (ii) ESG funds may be used only for these services to the extent that other appropriate mental health services are inaccessible or unavailable within the community.
 - (iii) Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about

positive resolution of the problem or improved individual or family functioning or circumstances.

(iv) Eligible treatment consists of crisis interventions, the prescription of psychotropic medications, explanation about the use and management of medications, and combinations of therapeutic approaches to address multiple problems.

5. Transportation- The transportation costs of travel by outreach workers, social workers, medical professionals, or other service providers are eligible, provided that this travel takes place during the provision of services eligible under this section. The costs of transporting unsheltered people to emergency shelters or other service facilities are also eligible. These costs include the following:

- (i) The cost of a program participant's travel on public transportation;
- (ii) If service workers use their own vehicles, mileage allowance for service workers to visit program participants;
- (iii) The cost of purchasing or leasing a vehicle for the recipient or sub-recipient in which staff transports program participants and/or staff serving program participants, and the cost of gas, insurance, taxes and maintenance for the vehicle; and
- (iv) The travel costs of recipient or sub recipient staff to accompany or assist program participants to use public transportation.

6. Services for Special Populations- ESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under paragraphs (a)(1) through (a)(5) of this section. The term *victim services* means services that assist program participants who are victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking.

Chapter 4

REPORTS

Reports

ESG sub-recipients are required to submit a semi-annual and annual report to the ESG Program Analyst. Please e-mail these reports to the ESG Program Analyst.

Any forms and requirements will be e-mailed to your organization by the ESG Program Analyst and will be posted online prior to the due date. These dates are subject to change *with* notification from the ESG Program Analyst.

Report	Due Date	Send To
Semi Annual Match/Spending Report	January 31 st	ESG Program Analyst
Annual Match/Spending Report	July 31 st	ESG Program Analyst
ESG Outreach CAPER	July 31 st	Upload to SAGE
Final Claim for fiscal year	July 31 st	Online Claims Management

***Note: All reports are due by close of business (5pm EST) on the date noted. You will lose points during the following application period for turning in late reports.**

Chapter 5

HMIS

Homeless Management Information System

The Homeless Management Information System (“HMIS”) is a secure, confidential electronic data collection system used to determine the nature and extent of homelessness. **The Sub-recipient is required to enter data into HMIS on a regular and consistent basis, which is defined as data entry within five days from the time of intake.**

IHCDA will regularly monitor HMIS usage to verify consistent data entry for applicable shelters. Data must be entered for the ESG funded shelter program and all other residential programs serving homeless individuals and families. The HMIS data elements to be collected are determined by HUD. The HMIS system is used to report to HUD on an annual basis and to aid in local and statewide policy and planning.

Sub-recipients that utilize Essential Service funds for Case Management activities are required to enter all relevant client level data including case notes into HMIS or DV ClientTrack (if the sub-recipient is a victim services provider) on a consistent basis. All street outreach projects including those funded by ESG should gather date of contact and date of engagement information to be included within HMIS. For HMIS assistance please contact the HMIS Help Desk at: hmishelpdesk@ihcda.in.gov.

Victim services providers are not allowed to enter data into the HMIS but must enter data into a comparable database as described below.

Victim service providers must enter client-level data on ESG beneficiaries/clients into a comparable database, which collects all of the HMIS universal data elements listed in this paragraph and generates unduplicated aggregate reports. Victim service providers are encouraged to use DV ClientTrack database. The data required for entry into DV ClientTrack database or the victim service provider’s comparable database must include the following data elements: Name, Social Security Number, Date of Birth, Ethnicity, Race, Gender, Veteran Status, Disabling Condition, Residence Prior to Program Entry, Zip Code, Length of Stay at Previous Residence and Homeless Cause.

To sign up for DV ClientTrack, please contact the Helpdesk at: dvhelpdesk@ihcda.in.gov. Victim service providers within the Balance of State Continuum of Care can choose to opt into DV ClientTrack. Access to the data entered into the system will be restricted to the organization that entered it and therefore the system will be compliant with the Violence Against Women’s Act (VAWA). The system will collect client-level data over time including, but not limited to all of HMIS’s universal data elements, and generate unduplicated aggregate reports based on the data. Information entered into this comparable database will not be entered directly into or provided to an HMIS.

Note:

- Client-level data including personal identifying information should never be stored in unsecured platforms including but not limited to Google Docs.
- Failure to enter data within (5) days may result in the termination of the ESG agreement.
- When documenting services within HMIS please use the following choices: Engagement Case Management, Outreach, Other Services, and Transportation. **For more information please refer to chapter 3.**

Street Outreach Data Collection Requirements

The elements shown are only those in which at least one ESG program component is required to collect information:



U.S. Department of Housing and Urban Development (HUD): Emergency Solutions Grant (ESG)

Data Collection Requirements & HMIS Project Type

Components:		ESG: Emergency Shelter	ESG: Emergency Shelter CoC: Safe Haven (Legacy)	ESG: Homelessness Prevention	ESG: Rapid Rehousing	ESG: Street Outreach
#	Name	Emergency Shelter (HMIS Project Type 1) - entry/exit tracking method	Emergency Shelter (HMIS Project Type 1) - night-by-night tracking method	Homelessness Prevention (HMIS Project Type 12)	PH - Rapid Rehousing (HMIS Project Type)	Street Outreach (HMIS Project Type 4)
3.01-3.917	Universal Data Elements (All)	X	X	X	X	X
4.02	Income and Sources	X	X	X	X	X
4.03	Non-Cash Benefits	X	X	X	X	X
4.04	Health Insurance	X	X	X	X	X
4.05	Physical Disability	X	X	X	X	X
4.06	Developmental Disability	X	X	X	X	X
4.07	Chronic Health Condition	X	X	X	X	X
4.08	HIV/AIDS	X	X	X	X	X
4.09	Mental Health Problem	X	X	X	X	X
4.10	Substance Abuse	X	X	X	X	X
4.11	Domestic Violence	X	X	X	X	X
4.12	Current Living Situation		X			X
4.13	Date of Engagement		X			X
4.14	Bed-Night Date		X			
4.19	Coordinated Entry Assessment	Depends on CoC's CE System	Depends on CoC's CE System	Depends on CoC's CE System	Depends on CoC's CE System	Depends on CoC's CE System
4.20	Coordinated Entry Event	Depends on CoC's CE System	Depends on CoC's CE System	Depends on CoC's CE System	Depends on CoC's CE System	Depends on CoC's CE System
W5	Housing Assessment at Exit			X		

X= Data Collection is required.

CA= Data Collection is determined by how the COC has structure the coordinated assessment in their area. Placement of the element would be required for any project that is conducting a coordinated assessment. This may be across multiple projects or sited in a central access point or coordinated intake center.

Statewide Point-in-Time Homeless Count

The sub-recipient is required to participate in the annual Statewide Point-in-Time count in collaboration with its regional Continuum of Care by submitting appropriate data upon request by deadlines established by the ESG Program Analyst or the HMIS/ClientTrack Manager. If you have any questions about the Statewide Point- in- Time Homeless Count, please contact the State lead Grant Peters at: Gpeters@ihcda.in.gov

Chapter 6

AWARD MONITORING

The ESG Program Analyst will monitor a minimum of 25% of the total ESG Sub-recipients every year. New sub-recipients will be monitored within the first year of their grant agreement with Indiana Housing and Community Development Authority.

All shelters who will be subject to on-site monitoring will receive at least two weeks notification prior to the visit confirming the date and time of the monitoring and a monitoring checklist. The checklist contains a list of areas that will be reviewed and documents that will need to be made available at the time of monitoring.

Upon completion of the review, IHCDA will send a letter detailing all concerns and findings discovered during the monitoring visit. The letter will be sent within 30 days of the monitoring visit unless an investigation of findings requires more time. If there are findings or concerns discovered, the letter will request the agency to submit a specific resolution or correction within a certain period of time.

Additionally, IHCDA staff may be available throughout the program year to conduct interim monitoring to help new sub-recipients or agencies with new staff ensure their continued compliance with the ESG program. Please contact the ESG Analyst to schedule an interim monitoring.

Chapter 7

FINANCIAL MANAGEMENT

Before a sub-recipient may first request reimbursement for ESG funds expended on specific activities/budget line items, the following items must be received by IHCDA:

- Signed/executed award agreement;
- Completed budget page;
- Authorized signature form; and
- Requested documentation in response to conditional funding (if applicable)

Match

Each sub-recipient must match dollar-for-dollar the ESG funding provided by HUD with funds from other public or private sources. A sub-recipient may comply with this requirement through matching funds or voluntary efforts provided by any recipient or project sponsor.

Matching funds must be provided after the date of the grant award to the sub-recipient. Funds used to match a previous ESG grant may not be used to match a subsequent grant award. No federal funds can be used for match, with the exception of Community Development Block Grant (CDBG) and Community Service Block Grant (CSBG) funds.

All ESG sub-recipients are required to contribute 100% match to their ESG program. For example, if the ESG award is \$10,000, the sub-recipient must demonstrate \$10,000 as match.

Examples of Possible Sources of ESG Match

Below are some examples of match that could be used as ESG match. Please note that in order for the match to be counted, it the source must be eligible and its use must be an eligible ESG activity. Match can be provided by the sub-recipient itself OR any other community agency, but must directly benefit the ESG participants and be provided during the award term in order to be counted. This list is not exhaustive.

In-Kind	Cash
211 Helpline: Time conducting I-HOPE assessments or other eligible expenses.	CDBG, CSBG
AIDS/HIV-related services provided to ESG participants	City or County funds
Alcohol and substance abuse services	Community Action Agencies
Bookkeeping/Administrative services for ESG program (but not billed to ESG)	Donations received as a result of the Neighborhood Assistance Program
Budgeting, credit repair service provided to participants in the community (but not billed to ESG)	ICJI grants, as eligible
Case management (not billed to ESG)	Local Foundations
Child care	Private donations
Clothing, Household, Hygiene items donated	Program income
Community Center - educational meetings related to housing, transportation vouchers, other eligible financial assistance	United Way
Donation Inventory Management	Township Trustees(s) assistance provided to ESG participants
Education, GED, classes (parenting)	
Employment assistance & Job Training	
Emergency Shelter/ Transitional Housing - services provided in program, not billed to ESG	
Faith Based Community; Ecumenical/Ministerial associations	

Food donated to participants by local churches (food stamps <i>cannot</i> be counted)	
Furniture donated	
Health care provided by	
Housing Food kit, Move-in kit preparation	
Housing placement	
Hygiene Kit preparation	
Legal Services	
Life skills Training not billed to ESG	
Mental health services (CMHC's)	
Minority Health Coalitions	
Motel Stays	
Move in Kits donated	
Office space donated	
Street Outreach: Engagement, case management, emergency mental health services, transportation, services to special populations	
Outpatient Health services - Community Health Centers, other medical centers	
Rent, not paid with ESG	
Renovation of shelter facility, benefiting ESG participants	
School Corporations- eligible services provided to ESG participants	
Transportation	
Utilities, not paid with ESG	
Utility Companies- any amount that is waived from arrears or deposits off of amount due	
Volunteer - professional - local, customary rate	

Required Match Reporting and Documentation

Cash/Grant (United Way, private monetary donations, local foundations, etc.)

- Must have a signed MOU/ Award Letter from the organization providing the cash donation documenting the following:
- Specific date the cash will be made available (noted on MOU if grant is a monthly claims process/ Time period during which funding will be available)
- The actual grant and fiscal year to which the cash match will be contributed

In-Kind Services

- Must have a signed MOU from the organization providing the in-kind services documenting the following:
- Who will provide the services, value per hour of the services provided and how that rate was determined.
- Commitment of the agency providing the services to supply the sub-recipient with the documentation to support the value of the services/ match provided. It is the responsibility of the sub-recipient to obtain the documentation and provide to IHCDA with the match report.

Semi Annual Match Reports are due by the 31st of January for Quarters 1 and 2 and by the 31st of July for Quarters 3&4. Contact Grant Analyst for Closeout form if you do not receive one.

ESG Match Reporting and Documentation Form must be used to report match to IHCD. This should include the following documentation:

- Internal tracking to show match was received and used for eligible activities.
- Copy of general ledger with match funds received clearly noted as ESG match and ties out to the amount on the match report. The general ledger should also show the match funds were spent on ESG eligible activities.
- Copy of bank statement showing cash donations (other grants, private donations, etc) showing funds deposited into account. If the funds are received through a claims process, a copy of each month's statement showing that monthly deposit should be provided.
- Documentation of case management used as match but not claimed for reimbursement must include tracking of time spent with ESG participants (case management provided by agency is considered cash match, not in-kind, case management provided by a third party would be in-kind).
- Documentation for any salary paid to staff to carry out the ESG program (that is not reimbursed by the ESG grant). Must include timesheets showing staff salary and time spent on ESG funded program.

Budget Modifications

Line item budget modifications for ESG Street Outreach can be done as much as needed. A budget modification form must be completed for change to be made.

To submit a budget modification, request an updated form found from the ESG Analyst and:

1. Submit your Budget Modification form to ESG Analyst via email or upload the signed modification form on IHCD Online under Award Claims Management.
2. Select Award Info from the left column.
3. Choose award from the dropdown menu.
4. Select supporting documentation tab
5. Choose the browse button to select the document from your computer.
6. Choose the Document Type Amendment/Budget Modification from the drop down menu.
7. Choose **Submit Document**- the document will now appear in the list shown above where it can be viewed by users with access to this screen.
8. A notification will be automatically sent to the appropriate staff member notifying that the document has been uploaded for review.
9. You will receive an email notification from Program Staff once the modification has been completed.

Claims

Claims for reimbursement will be submitted through IHCD Online electronic claims system via <https://ihcdaonline.com/>. Supporting documentation must be submitted electronically through IHCD Online. The fiscal year is July 1-June 30 of each year. Sub-recipients may submit claims monthly, for up to 12 months.

If you have questions regarding a specific claim, contact the online claims system at claims@ihcda.in.gov. The subject line of your email should contain your agency name, the award number, and the claim number, as well as any appropriate additional information (i.e. Homeless Shelter, ES-029-075, Claim 1, documentation clarifications).

Detailed instructions on claim access, submission, and claims policy information can be found via <https://ihcdaonline.com/>.

Claim Process

All claims are paid on a reimbursement basis. Sub-recipients incur eligible costs and then request reimbursement by IHCD. There will be up to 12 claims per fiscal year. Each claim represents one month of bills that were *incurred or paid* during that month. Example: Claim #1 (July) will contain all eligible ESG expenses for July. All of the expenses listed must have either been incurred at some time in July or paid in July. Sub-recipients cannot claim more or less than one month's expenses in one claim. After one month is claimed, the Sub-recipient cannot reclaim expenses for that same month later in the fiscal year. Similarly, if a sub-recipient skips one month, and claims the month following the skipped month, the skipped month cannot be claimed at a later time. It is allowable to claim your award in less than 12 months (12 claims). Reimbursements for eligible ESG expenses as provided and approved on ESG claim voucher will be directly deposited into the sub-recipient bank account within 10 business days from IHCD approval.

Sub-recipients must submit request for reimbursement for no less than seventy-five percent (75%) of total award no later than March 1st the year following the start of the grant cycle.

The sub-recipient must submit each claim for eligible expenses within thirty (30) days after the calendar month in which the expenses are incurred or paid by the Sub-recipient. For example, the December claim must be submitted no later than last day of January.

Claim components:

Financial Narrative- The Financial Narrative is an excel form that is separate from the online claim system. The narrative details the expenses being claimed. The sub-recipient must list the vendor name and the amount of the expense that is being claimed to ESG under the appropriate eligible category.

Supporting Documentation- This documentation includes copies of the actual receipt or bills that are being claimed for reimbursement or a copy of the check sent to the vendor. If a bill/invoice is submitted, the check number and date paid must be written/stamped on it. The organization will be contacted if there is any issue with the claim. Upload a copy of the approval email from Analyst with late claim submission if applicable.

Claiming Salaries - Salaries can be budgeted in Essential Services and/or Operations. All salaries in Essential Services can be for staff time spent providing *direct services* to homeless clients, such as case management. All salaries claimed in Operations, can be for staff time spent operating the building and/or shelter program. Salaries can be claimed only to the amount budgeted for in the Award Agreement. On the claim financial narrative, list the employee's name in the corresponding activity column, and the amount claimed to ESG in the amount column.

Please include the type of eligible activity that the staff was doing for ESG. IHCD also requires pay stubs to be submitted with each claim that includes payment for staff. The pay stubs may have personal information redacted but should have the date paid, hours worked, and pay rate easily identifiable.

Closeout of ESG Funds:

All ESG sub-recipients will be required to run a CAPER in HMIS and upload the report to SAGE by July 31st. In addition, you must complete and submit an Annual Match/Spending due by July 31st. This form will be distributed to sub-recipients by the ESG Analyst, and a reminder email will be sent close to the end of the fiscal year. The final claim must be submitted by July 31st. All unclaimed funds remaining after this date will be closed out and no longer available to the sub-recipient. Any sub-recipient who does not claim all funds by the end of the program year will negatively affect the award amount the following program year.

OMB Audit and Financial Statements:

Each year IHCDA collects Year-End Financial Statements and OMB audits from its sub-recipients. To provide better customer service we have changed the submission process.

Organizations that are required to submit an OMB Audit formerly A133 must send their financials to IHCDA at A133@ihcda.in.gov.

Organizations that are not required to submit an OMB audit must submit their financials to schen@ihcda.in.gov.

OMB Audit Required:

Sub-recipients that expend \$750,000 or more in federal funds (as a collective whole from all of their federal awards) in a fiscal year must be audited in accordance with the requirements of 2 CFR 200.501, and provide a copy of such audit to IHCDA and to the Federal Audit Clearinghouse. If this applies to your organization, please submit an electronic copy of your financial statements and OMB Audit to IHCDA at A133@ihcda.in.gov. Hard copies will not be accepted. Questions regarding your OMB audit should be directed to A133@ihcda.in.gov.

Also, please ensure that your OMB audit is performed by an approved auditor. You will find a list of approved auditors on IHCDA’s website.

OMB Audit Not Required:

Sub-recipients that do not spend over \$750,000 in federal funds (as a collective whole from all of their grants) will only need to submit their year-end financial statement or Form 990. If this applies to your agency, please send an electronic copy of year-end financial statement or Form 990 A133@ihcda.in.gov. Hard copies will not be accepted.

Financials are due to IHCDA according to the following schedule:

Year End Date:	Due Date:
June 30	March 31 or 30 days after receipt of the auditor’s report (whichever is earlier)
Dec 31	Sept 30 or 30 days after receipt of the auditor’s report (whichever is earlier)

Internal Controls.

The sub-recipient must:

1. Establish and maintain effective internal control over federal funds that provides reasonable assurance that the sub-recipient is managing federal funds in compliance with Federal statutes, regulations, and the terms and conditions of the federal funding. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the Comptroller General of the United States or the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).
2. Comply with Federal statutes, regulations, and the terms and conditions of federal funds.
3. Evaluate and monitor the sub-recipients compliance with statutes, regulations and the terms and conditions of the federal funds.

4. Take prompt action when instances of noncompliance are identified including noncompliance identified in audit findings.
5. Take reasonable measures to safeguard protected personally identifiable information and other information that IHCDA or HUD designates as sensitive or the sub-recipient considers sensitive consistent with applicable Federal, state, local, and tribal laws regarding privacy and obligations of confidentiality.

Mandatory Disclosure.

The sub-recipient must disclose, in a timely manner, in writing to IHCDA all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the ESG funds. The sub-recipient's failure to make these disclosures may subject to the sub-recipient to remedies of non-compliance set forth in 2 CFR 200.338.

If the total value of the sub-recipient's currently active grants, cooperative agreements, and procurement contracts from all Federal awarding agencies exceeds \$10,000,000 for any period of time during the period of performance of this Federal award, then the sub-recipient must maintain the currency of information reported to the System for Award Management (SAM) that is made available in the designated integrity and performance system (currently the Federal Awardee Performance and Integrity Information System (FAPIIS)) about civil, criminal, or administrative proceedings described in paragraph 2 of this award term and condition. This is a statutory requirement under section 872 of Public Law 110-417, as amended (41 U.S.C. 2313). As required by section 3010 of Public Law 111-212, all information posted in the designated integrity and performance system on or after April 15, 2011, except past performance reviews required for Federal procurement contracts, will be publicly available.

Chapter 7

CIVIL RIGHTS /ACCESSIBILITY

As a recipient of federal funds, you are required to maintain compliance with civil rights and fair housing laws. The information in this chapter is provided to educate you on your requirements and as a resource tool to assist you in facilitating access to housing for your clients. If you have specific questions about any of the laws please contact IHCD for clarification.

The Fair Housing Act states that it is illegal to discriminate against any person because of race, color, religion, sex, handicap, familial status, or national origin in:

- the sale or rental of housing or residential lots;
- advertising the sale or rental of housing;
- the financing of housing;
- the provision of real estate brokerage services; and
- the appraisal of housing.

The Fair Housing Amendments Act of 1988 Final Committee Report to the House of Representatives (100-711) dated June 17, 1988 provides the background information to the Fair Housing Law and Committee intentions when submitted to Congress. The Fair Housing Amendments became Public Law 100-430 on September 13, 1988 to amend Title VIII, commonly called The Civil Rights Act of 1968. This legislation revised certain procedures and implemented new protections and enforcement. On Monday, January 23, 1989, the Federal Register contained the Final Rule for implementation of the Fair Housing Amendments Act of 1988. The effective date of this legislation was March 12, 1989 with the specific provisions for new construction effective March 13, 1991.

Fair Housing legislation is clear in regard to discriminatory practices and penalties. The law does not intend to prohibit property owners, managers, and administrators from valid inquiries into an applicant's ability to meet lease requirements and/or program eligibility requirements as set forth in Federal or State programs or in a Tenant Selection Criteria. However, there are certain areas that owners, managers, and administrators must clearly understand in regard to legitimate questions and disallowed inquiries. These are discussed below:

1. Independent Living - An owner, manager, or administrator should not attempt to assess whether an applicant is capable of independent living but only whether the applicant meets essential eligibility requirements. If an applicant requires supportive services but does not ask that they be provided, the need for supportive services should not be considered a factor in determining eligibility. If the provision of supportive services is part of the housing program, then these services should be provided in a non-discriminatory manner. However, no provider is required to take any action which would fundamentally alter the nature of the program in order to accommodate the disability of an applicant or tenant.
2. Restriction of Children/Handicapped in Housing: Evacuation Safely - There can be no restriction as to where persons may reside in housing with the exception of Federal or management priorities for certain adapted or accessible units. Accepting

or rejecting applicants on the basis of the ability to evacuate safely is not allowed.

3. **Legal and Illegal Questions** - The Fair Housing Law clearly defines legal and illegal questions for all applicants of all housing in the United States. It is unlawful to make an inquiry to determine whether an applicant for a dwelling, a person intending to reside in that dwelling after it is sold, rented or made available, or any person associated with that person, has a handicap or to make inquiry as to the nature or severity of a handicap of such a person.

However, the following inquiries can be made, **provided these inquiries are made to all applicants, whether or not they have handicaps:**

- Inquiry into an applicant's ability to meet the requirements of ownership or tenancy;
- Inquiry to determine whether an applicant is qualified for a dwelling available only to persons with handicaps or to persons with a particular type of handicap;
- Inquiry to determine whether an applicant for a dwelling is qualified for a priority available to persons with handicaps or to persons with a particular type of handicap;
- Inquiry to determine whether an applicant for a dwelling is a current illegal abuser or addict of a controlled substance;
- Inquiry to determine whether an applicant has been convicted of the illegal manufacture or distribution of a controlled substance.

A manager or owner is never required to make available a dwelling to an individual whose tenancy would constitute a direct threat to the health or safety of other individuals, or whose tenancy would result in substantial physical damage to the property of others.

Sub-recipient Required Actions

Sub-recipients are required to make ESG funded facilities and services available to all on a nondiscriminatory basis, and publicize this fact. The procedures that a sub-recipient uses to convey the availability of such facilities and services should reach persons with handicaps, or persons of any particular race, color, religion, sex, age, familial status or national origin within their service area who may qualify for them.

If not, the sub-recipient must establish additional procedures that will ensure that these persons are made aware of the facilities and services. Sub-recipients must adopt procedures to disseminate information to anyone who is interested regarding the existence and location of handicap accessible services or facilities.

Sub-recipients are required to post Fair Housing Opportunity poster and Handicap accessibility poster if applicable. If a shelter cannot provide handicap accessibility services, then they must provide a procedure to refer individuals to accessible services or facilities.

Sub-recipients operating Emergency Shelter and Transitional Housing are required to post Fair Housing Logos on materials given to participants.



Civil Rights Laws

Introduction

The civil rights laws, regulations, and executive orders are designed to protect individuals from discrimination on the basis of race, national origin, religion, color, sex, age and handicap status. These laws, regulations, and executive orders, as they apply to the ESG program, protect individuals from discrimination in housing, the use of public facilities and services, benefits created by ESG projects, and employment and business opportunities.

The following is a summary of the regulations.

Title VI - Civil Rights Act of 1964

Title VI provides that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. It directs each federal department or agency that extends financial assistance to any program or activity through grants, loans, or contracts, except contracts of insurance or guaranty, to issue rules or regulations to be approved by the President to carry out the purposes of the Title. Title VI authorizes the termination or the refusal to grant or continue federal assistance under any program or activity involving a recipient receiving an express finding of a failure to comply, but only after due notice, an opportunity for a hearing, and a determination that compliance cannot be secured by voluntary means.

In accordance with Title VI of the Civil Rights Act of 1964 (Title VI) and its implementing regulations, sub-recipient agrees to take reasonable steps to ensure meaningful access to activities for LEP persons. Any of the following actions could constitute “reasonable steps”, depending on the circumstances: acquiring translators to translate vital documents, advertisements, or notices, acquiring interpreters for face to face interviews with LEP persons, placing advertisements and notices in newspapers that serve LEP persons, partnering with other organizations that serve LEP populations to provide interpretation, translation, or dissemination of information regarding the project, hiring bilingual employees or volunteers for outreach and intake activities, contracting with a telephone line interpreter service, etc.

Title VII – Civil Rights Act of 1964 (as amended)

This provision prohibits discrimination in employment on the basis of sex.

Title VIII – Civil Rights Act of 1968

Title VIII prohibits blockbusting, or discrimination in the sale or rental of dwellings, the financing of housing, or advertising. Title VIII makes it unlawful to deny any person access to, membership, or participation in any multiple listing service or real estate brokers’ organization for discriminatory reasons. The law is applicable in stages and ultimately applies to all dwellings except those which are specifically exempt. Title VIII generally does not apply to the sale or rental of a single family house by a private individual owner who does not own more than three such single-family houses at any one time. After December 31, 1969, the sale or rental of any such single-family home is exempted from the application of Title VIII only if it is sold or rented without the use of a broker and without discriminatory advertising. The act does not apply to rooms or units in dwellings

containing living quarters occupied by not more than four families living independently of each other and the owner occupies one of such quarters as his or her residence.

Also exempted is the sale or rental of dwellings owned or operated by religious organizations, for other than a commercial purpose, to persons of the same religion unless membership in such religion is restricted on account of race, color or national origin. Neither does Title VIII prohibit a private club, not open to the public and providing lodging which it owns or operates for other than commercial purposes, from limiting rental or occupancy to its members.

Section 3: Housing and Urban Development Act of 1968

Section 3 provides that to the greatest extent feasible, training and employment opportunities shall be made available to low-income residents of project areas and that contracts be awarded to small businesses located within the project area or owned in substantial part by project area residents.

Section 109: Housing and Urban Development Act of 1974

Section 109 provides that no person in the United States shall on the ground of race, color, national origin or sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity funded in whole or in part under this title.

Section 504: Rehabilitation Act of 1974

Section 504 provides that no otherwise qualified handicapped individual in the United States, as defined in Section 7(6), shall, solely by reason of this handicap, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

Age Discrimination Act of 1975

The Act provides that no person in the United States on the basis of age shall be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

Executive Order 11063

Executive Order 11063 provides that no person on the basis of race, color, religion, sex or national origin, shall be discriminated against in:

- Housing (and related facilities) provided with federal assistance.
- Lending practices, with respect to residential property, when such practices are connected with loans insured or guaranteed by the federal government.

Executive Order 11246, as amended by Executive Order 11375

Executive Order 11246, as amended by Executive Order 11375, provides that no person shall be discriminated against on the basis of race, color, religion, sex or national origin in any phase of employment during the performance of federal or federally assisted construction contracts in excess of \$25,000.

Executive Order 12138: Women Business Enterprise Policy

For purposes of this Order, affirmative action may include, but is not limited to, creating or supporting new programs responsive to the special needs of women business enterprises, establishing incentives to promote business or business-related opportunities for women business enterprises, collecting and disseminating information in the support of women business enterprises and ensuring to women business enterprises knowledge of any ready access to business-related services and resources. In implementing this Order an agency undertakes to use or to require compliance with numerical set-asides or similar measures. It shall state the purpose of such measure and the measure shall be designed on the basis of pertinent factual findings of discrimination against women's business enterprise and the need for such measure.

Minority and Women Business Participation

Minority-owned and women-owned business enterprises (MBE/WBE's) shall have the maximum feasible opportunity to participate in the performance of contracts under federal grant programs. Award recipients shall exercise their "best efforts" to ensure that MBE/WBE's are given the opportunity to participate in ESG-funded contracts, including contracts for services, supplies and construction activities. Indiana has adopted a goal of 11.47% participation by minority owned business enterprises and 5.93 for women-owned business enterprises in federally funded activities.

A minority- or women-owned business enterprise is defined for this program as a business which has been established for at least one year and is 51% owned, operated and controlled by minorities or women. Corporation or partnerships formed merely to qualify as an MBE or WBE for purposes of this program will not be considered minority or women-owned business enterprises.

Award recipients are required to maintain documentation supporting their "best efforts" to achieve the state goal of 11.47% minority owned business enterprise participation and/or 5.93% women-owned business enterprise participation on all ESG-funded procurement and contract solicitation. To document "best efforts" and attain the goals, the following steps should be taken to solicit bids from and encourage participation by minority- or women-owned business enterprises:

1. Where legal notice is required by law, include language notifying bidders of the 11.47% and 5.93% MBE/WBE participation goal on the project.
2. Contact IHEDA or the Indiana Department of Administration Minority Business Development Division for a referral list of firms in the categories of work needed for the development including professional services, supply, and construction services.
3. Contact at least two (2) MBE/WBE firms from the referral list, notifying them of the impending bidding opportunity and how to participate.
4. If award recipients anticipate the use of subcontractors or additional purchasing contracts for supplies, then the referral list of qualified minority- and women-owned businesses should be disbursed to all prime contractors at this conference. Award recipients should supply a copy of the plans and specifications as well as a list of the organizations that will have plans and specification on file.

CONFLICT OF INTEREST

Requirements

- A. The provision of any type or amount of ESG assistance may not be conditioned on an individual's or family's acceptance or occupancy of emergency shelter or housing owned by the sub-recipient, or a parent or subsidiary of the sub-recipient. No sub-recipient may, with respect to individuals or families occupying housing owned by the sub-recipient, or any parent or subsidiary of the sub-recipient, carry out the initial evaluation required under 24 CFR 576.401 or administer homelessness prevention assistance under 24 CFR 576.103.
- B. The sub-recipient must maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of contracts. No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. The officers, employees, and agents of the sub-recipient may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, the sub-recipient may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value. The standards of conduct must provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the sub-recipient.
- C. If the sub-recipient has a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe, the sub-recipient must also maintain written standards of conduct covering organizational conflicts of interest. Organizational conflicts of interest means that because of relationships with a parent company, affiliate, or subsidiary organization, the sub-recipient is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization.

HUD Procedure for Individual Conflicts of Interest

Conflicts Prohibited

No persons (as described in persons covered) who exercise or have exercised any functions or responsibilities with respect to ESG activities or who are in a position to participate in a decision making process or gain inside information with regard to such activities, may obtain a financial interest or benefit from the activity, or have an interest or benefit from the activity, or have an interest in any contract, subcontract or agreement with respect thereto, or the proceeds there under, either for themselves or those with whom they have family or business ties, during their tenure or for one year thereafter.

Persons Covered

The conflict-of-interest provisions apply to any person who is an employee, agent, consultant, officer, or elected official or appointed official of the state, or of a unit of general local government, or of any designated public agencies, sub-recipients which are receiving ESG funds.

Exceptions:

A request for an exception to this conflict-of-interest prohibition will be considered by IHCDA only after the sub-recipient has provided the following:

1. A copy of the minutes from a public meeting denoting that the affected person has publicly disclosed the conflict of interest and has stated that he/she has withdrawn from functions or responsibilities with respect to the assisted activity in question.
2. An opinion from the sub-recipient's attorney that the interest for which the exception is sought would not violate State or local law.

Once IHCDA receives minutes of the public meeting and an opinion from the sub-recipient's attorney, IHCDA will respond in writing as to whether an exception to the conflict-of-interest prohibition has been granted.

Should IHCDA approve the sub-recipient's request, a completed Uniform Conflict of Interest Disclosure Statement must be provided to IHCDA as well as filed with the State Board of Accounts and the Clerk of the Circuit Court of the county in which the governmental entity executed the contract or purchase within 15 days after the final action toward awarding ESG funds to the person in question. A copy of this form can be found at <http://www.in.gov/sboa/files/Form236.pdf>.

IHCDA will approve an exception to this conflict-of-interest prohibition only after it has been determined that such an exception will serve to further the purpose of the Act and the effective and efficient administration of the ESG program.

Chapter 9

PROCUREMENT PROCEDURES

Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards set forth in 2 CFR 200 establishes standards and guidelines for the procurement of supplies, equipment, construction, and services to ensure that they are obtained as economically as possible through an open and competitive process, and that contracts are managed with good administrative practices and sound business judgment. The regulations include:

- Standards that prohibit conflicts of interest;
- Procedures for open competition with consistent technical solicitations;
- Affirmative efforts to hire minority- and women-owned enterprises;
- Maintenance of selection documentation; and
- Contract administration system that provides sufficient monitoring.

The guidelines on procurement are summarized as follows:

- Sub-recipient s are allowed to use their own procurement procedures as long as those procedures conform to the provisions of the regulations;
- Sub-recipient s must maintain a system to handle disputes, protests, and other matters arising out of its contracts; maintain a code of conduct to prevent conflicts of interest (personal, financial, and organizational); and use solicitations which are clear and accurately describe the materials, products, or services being procured
- Sub-recipient s must use some form of cost or price analysis in connection with each of its procurements. They must be able to justify procurements awarded on a non- competitive basis and justify the awarding of procurements by bid on the basis of other than the lowest bid.
- Sub-recipient s must initiate positive efforts to use small and minority-owned businesses to the maximum extent possible; include all applicable contract provisions in contracts; and not use the cost-plus-percentage of cost contracts.
- If the sub-recipient has a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe, the sub-recipient must also maintain written standards of conduct covering organizational conflicts of interest. Organizational conflicts of interest means that because of relationships with a parent company, affiliate, or subsidiary organization, the sub-recipient is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization.
- The sub-recipient's procedures must avoid acquisition of unnecessary or duplicative items. Consideration should be given to consolidating or breaking out procurements to obtain a more economical purchase. Where appropriate, an analysis will be made of lease versus purchase alternatives, and any other appropriate analysis to determine the most
- economical approach.

Chapter 10

FREQUENTLY ASKED QUESTIONS (FAQs)

1. Question:

How should recipients determine a family's eligibility for assistance under the Emergency Solutions Grants (ESG) Program or for the Continuum of Care (CoC) Program when the individual members of the family are residing in different places upon presentation to the project?

Answer:

Under HUD's Homeless Assistance Programs, persons presenting together for assistance regardless of marital status, actual or perceived sexual orientation, or gender identity are considered a family and can be served as a family in the ESG and CoC programs.

In general, when determining the homeless status of families where the individual members are not residing together when they present for intake into the project (e.g. one parent is staying in an emergency shelter and the other parent is staying with a child at a friend's house), eligibility must be assessed using:

1. The adult head of household (in cases where more than one adult is present in the family, HUD allows the family to choose which adult will be the head of household, for application purposes); or
2. The minor head of household when no adult is present.

2. Question:

Can Community Services Block Grant (CSBG) funds be used as match for ESG?

Answer:

Community Services Block Grant (CSBG) funds may be used to meet the match requirements for HUD's McKinney-Vento programs, including the Emergency Solutions Grants Program, as long as HUD's Appropriations Act language includes a provision authorizing recipients under HUD's McKinney-Vento Homeless Assistance Act programs to use other federal funds as match, and as long as the CSBG Act does not explicitly prohibit it. This provision was included for FY 2011, FY 2012, FY 2013, FY 2014, and FY 2015, so CSBG funds from those fiscal year allocations may be used to match ESG funds. However, if Congress does not include this provision in future Appropriations Act language, then using any federal funds as match for ESG funds will not be allowable.

It is important to note that any CSBG funds used for matching the ESG program must be used for the purposes of, and in accordance with the requirements of, both CSBG and the ESG program. Please see the information that the U.S. Department of Health and Human Services issued about using CSBG as match for the ESG Program, CoC Program, and other HUD programs.

2. Question:

What is the value of volunteer time that can be used for match for ESG?

Answer:

Under the Emergency Solutions Grants (ESG) program Interim Rule, there is not a fixed or standard hourly rate for volunteer services. Instead, under ESG, volunteer services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work in the recipient's or sub-recipient's organization. If there are no employees performing similar work, the rates must be consistent with those ordinarily paid by other employers for similar work in the same labor market. Recipients/sub-recipients should also develop a standardized form that documents the time the individual spent and the value of the services he/she provided.

For additional guidance on the level of documentation required to show the use of matching funds please review the matching requirements at 24 CFR § 576.201, the record keeping and reporting requirements at 24 CFR § 576.500(o), and calculating the amount of noncash contributions at 24 CFR § 576.201(e) of the ESG interim rule. According to these sections of the ESG interim rule, recipients are required to keep records of the source and use of the contributions made to satisfy the matching requirement in 24 CFR § 576.201. The records must include the following:

- The particular fiscal year grant for which each matching contribution is counted. Requirements: The matching contribution must be provided after the date that HUD signs the grant agreement and must be expended within the expenditure deadline.
- How the value placed on third-party, noncash contributions was derived. Requirement: You must use a method reasonably calculated to establish the fair market value.
- Document that the matching funds were used in accordance with both the other federal program's requirements and the requirements that apply to ESG grant funds, except for the expenditure limits in 24 CFR § 576.100. This would include, but is not limited to, documenting a participant's eligibility and, when applicable, documenting compliance with shelter and housing standards.

Chapter 11

REFERENCE MATERIALS & RESOURCES

http://www.in.gov/ihcda/	Indiana Housing & Community Development Authority
https://www.in.gov/ihcda/indianabos	Indiana Balance of State Website
http://www.in.gov/myihcda/2357.htm#H	IHCDA-Partner website-ESG specific
http://www.hudhre.info/index.cfm?do=viewResource&ResourceID=4517	Emergency Solutions Grant (ESG) Program Interim Regulations
http://www.hud.gov	Official HUD site
http://www.hudhre.info/esg/	Homeless Resource Exchange
http://www.endhomelessness.org	National Alliance to End Homelessness
http://www.hud.gov/offices/fheo/index.cfm	HUD Fair Housing Equal Opportunity Link
http://www.indianahousingnow.org	Indiana Housing Now Search Engine
14.231	Emergency Solutions Grant's Code of Federal Domestic Assistance (CFDA) Number
http://www.hud.gov/offices/fheo/promotingfh/928-1.pdf	Equal Housing Opportunity/ Fair Housing Poster