

# Fiscal Year 2025 Emergency Solutions Grant (ESG) Outreach, Shelter, RR/HP Overview

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# AGENDA:

Introducing Team

Status of FY2025 Awards

Client Eligibility by Funding Stream:

- Street Outreach
- Emergency Shelter
- Rapid Rehousing
- Homeless Prevention

Eligible Expenses:

- Street Outreach
- Emergency Shelter
- Rapid Rehousing
- Homeless Prevention

Claims Overview

HMIS Requirements

Documentation Requirements

Reporting Requirements

Compliance and Monitoring

Questions

# STATUS OF FY2025 AWARDS



Funding notifications sent to subrecipients

Precontracting documents:

- Budgets
- Local Government Approval Form (shelter awards only!)

Timing of contracts and award set-up

# CLIENT ELIGIBILITY BY FUNDING STREAM

## GENERAL NOTES ON ESG CLIENT ELIGIBILITY:

Income requirements  
vary by funding  
stream

Physically located  
within Indiana  
Balance of State  
Jurisdiction

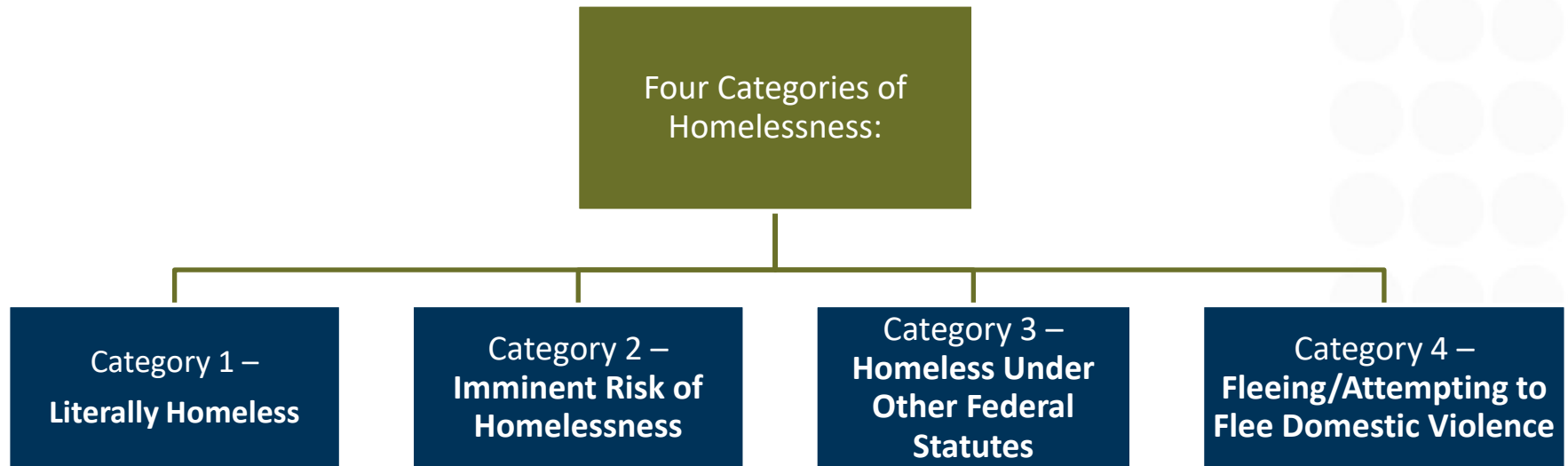
## GENERAL NOTES ON ESG CLIENT ELIGIBILITY:

Eligibility for all funding streams is dependent on the Four Categories of Homelessness defined by HUD.

Each funding stream may require that at least one of these categories be present to qualify for assistance.

Subrecipients should be aware of what funding stream(s) they have and their eligibility criteria

# GENERAL NOTES ON ESG CLIENT ELIGIBILITY:





# GENERAL NOTES ON ESG CLIENT ELIGIBILITY:

## Category 1 – Literally Homeless

Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

Has a **primary nighttime residence** that is a public or private place **not meant for human habitation**; or

Is living in a publicly or privately operated shelter designated to provide **temporary living arrangements** (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or

Is **exiting an institution** where (s)he has resided for 90 days or less **and** who resided in an emergency shelter or place **not meant for human habitation** immediately before entering that institution

**Note:** An individual or family **only needs to meet one of the three** subcategories outlined in green to qualify as “Homeless Category 1: Literally Homeless”.

# GENERAL NOTES ON ESG CLIENT ELIGIBILITY:

## Category 2 – Imminent Risk of Homelessness

An individual or family who will imminently lose their primary nighttime residence, provided that:

Residence will be lost within 14 days of the date of application for homeless assistance

No subsequent residence has been identified; *and*

The individual or family lacks the resources or support networks needed to obtain other permanent housing.

**Note:** Includes individuals and families who are within 14 days of losing their housing, including housing they own, rent, are sharing with others, or are living in without paying rent.

# GENERAL NOTES ON ESG CLIENT ELIGIBILITY:

## Category 3 – Homeless Under Other Federal Statutes

Unaccompanied youth under 25 years of age, or families with Category 3 children and youth, who do not otherwise qualify as homeless under this definition, but who:

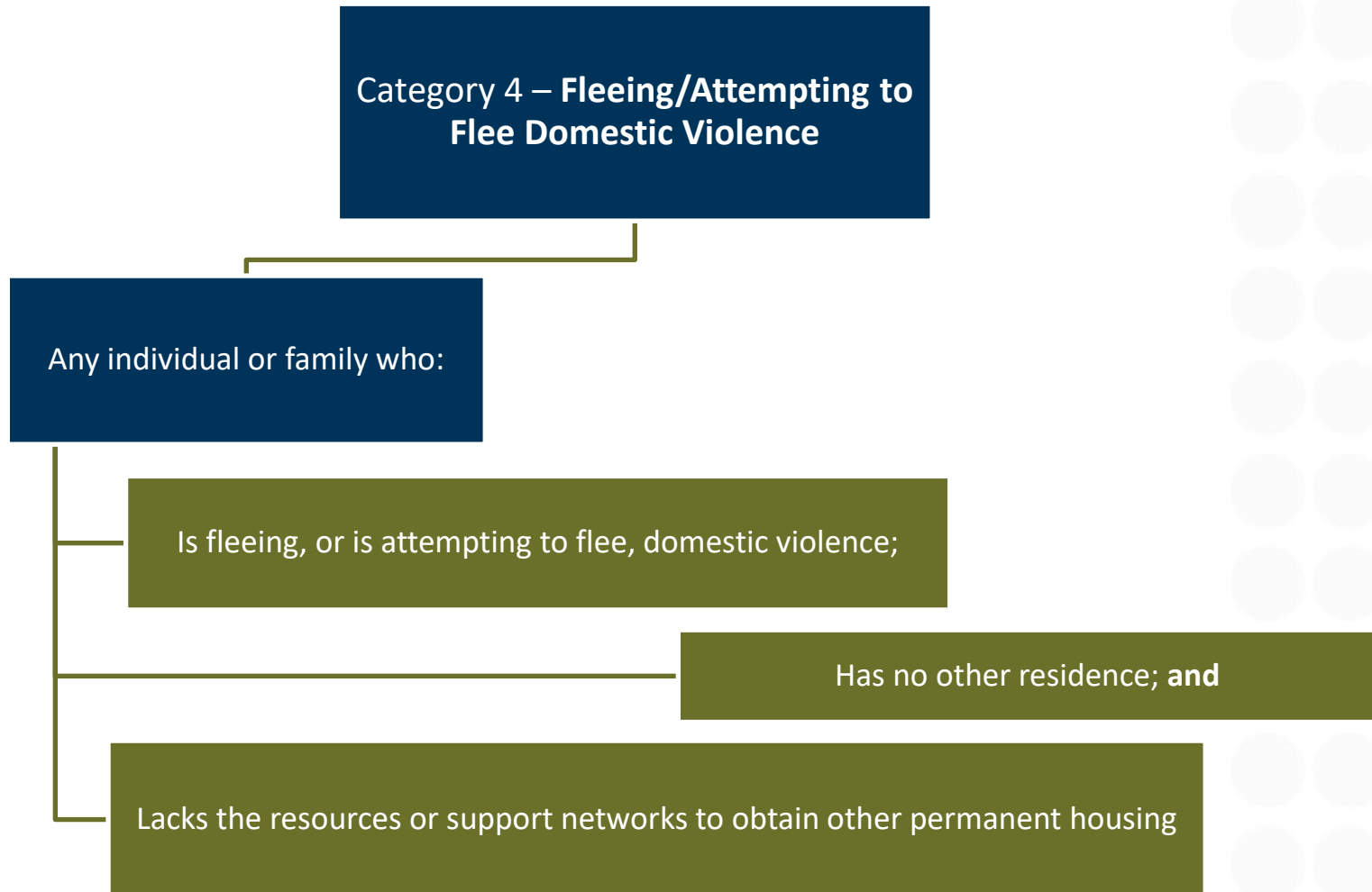
Are defined as homeless under the other listed federal statutes;

Have not had a lease, ownership interest in permanent housing during the 60 days prior to the homeless assistance application;

Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; **and**

Can be expected to continue in such status for an extended period due to special needs or barriers

# GENERAL NOTES ON ESG CLIENT ELIGIBILITY:



## STREET OUTREACH:

Serves Category 1—Literally Homeless

No Income Requirement

CHAT Assessment Encouraged

## EMERGENCY SHELTER:

Serves Category 1—Literally Homeless & Category 4—Fleeing/Attempting to Flee Domestic Violence

CHAT Assessment Required

No Income Requirement

Age of a child must not be used as a basis for denying shelter to a family

## RAPID REHOUSING:

Serves Category 1—Literally Homeless & Category 4—Fleeing/Attempting to Flee Domestic Violence

### No Income Requirement:

- Households with income, pay 30% of their adjusted gross income
- Households without income are not required to contribute financially to their rent until an increase in income occurs
- Complete the zero-income affidavit if a person enters the program without household income

Must Come from Coordinated Entry

## HOMELESSNESS PREVENTION:

Serves Category 2—Imminent Risk of Homelessness & Category 4—Fleeing/Attempting to Flee Domestic Violence

Household Income must be at or below **30% AMI**

- Must be re-evaluated every **3 months**
- Households with income, pay 30% of their adjusted gross income

Clients are not required to come from Coordinated Entry, *but...*

- Programs are required to utilize a client prioritization plan/policy



# ELIGIBLE EXPENSES BY FUNDING STREAM

## GENERAL NOTES ON ELIGIBLE EXPENSES:

In contrast with other programs, expenses that are ESG-eligible are very prescriptive.

Similar eligible expenses are present between funding streams.

### Federal Resources:

- Regulations:
  - 2 CFR 200 – General Accounting Principles for operating federal funding
  - 24 CFR 576 – ESG Regulations

### IHCDA Resources:

- ESG Webpage
- IHCDA Staff Members

# ELIGIBLE EXPENSES: STREET OUTREACH

## ESG Outreach—Eligible Expenses

Engagement

Case Management

Emergency Medical Services

Emergency Mental Health Services

Transportation

# Engagement

- The cost of activities to locate, identify and build relationships with people who are unsheltered and engage them for the purpose of providing immediate support and connection to resources.
- Initial assessment
- Addressing urgent needs; meals, clothing, blankets, toiletries
- Active connection of information and referrals to resources and programs
- **Examples:** connection to assessment for Coordinated Entry System, emergency shelter, community-based services, rapid rehousing programs, etc.

# 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:**

- Verifying and documenting eligibility; (homeless documentation form)
- 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
- Developing an individualized housing and service plan, including planning a path to permanent housing stability

# Emergency Health Services

## 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
- Providing medication and follow-up services

\*\*\*Funds may be used only for these services to the extent that other appropriate health services are inaccessible or unavailable within the community

**Must have documentation.**

# Emergency Mental Health Services

## 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
- Providing medication and follow-up services

\*\*\*Funds may be used only for these services to the extent that other appropriate mental health services are inaccessible or unavailable within the community

**Must have documentation.**



# 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 ESG eligible services

## Eligible costs include:

- The cost of a program participant's travel on public transportation
- The cost of transporting a participant to emergency housing or other service facilities
- Mileage reimbursement when an employee's own vehicle is used
- The cost of purchasing or leasing a vehicle for the 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
- The travel costs program staff to accompany or assist program participants to use public transportation

# ELIGIBLE EXPENSES: EMERGENCY SHELTER

# Eligible Activities-Essential Services

**Case management-** Salary of case manager working directly with shelter clients

**Child Care-** Payment to a licensed daycare center for child-care of shelter clients including providing meals, snacks, and activities

**Education Services-** Cost of books, instructional materials, literacy training

**Employment Assistance and Job Training-** Cost of job training programs; assistance in acquisition of vocational license and/or certificate

**Outpatient Health Services-** Outpatient Doctor examination, health screening, preventative medical care, medication, dental care

# Eligible Activities-Essential Services

**Legal Services-** Hourly fees and legal advice from licensed attorneys (*on matters impacting a client's housing outcomes only*)

**Life Skills Training-** Training budgeting resources, managing money, conflict resolution, shopping for food, etc.

**Mental Health Services-** Outpatient treatment by licensed professionals

**Substance Abuse Treatment Services-** Outpatient treatment for up to 30 days

**Transportation-** Travel to and from essential service activities-bus tokens, shelter vehicle, rideshare\*

## *Ineligible Activities* – Essential Services

- Salaries of employees **not** working directly with clients
- Staff recruitment/training
  - Training not sponsored by HUD
- Transportation costs not directly associated with service delivery
- Transportation-gas cards or filling client's car with gas
- Inpatient detoxification and other inpatient drug or alcohol treatment

## Eligible Activities- Operations

**Equipment:** Purchasing new computers, printers, copy machines, microwave for shelter kitchen, etc.

**Insurance:** Shelter building insurance; auto insurance on shelter owned (or leased) vehicle used for shelter program

**Shelter Staff:** Max 10% of award (excludes maintenance and security salary costs)

**Food:** For shelter clients only

**Furnishings:** mattresses, beds, tables to furnish shelter rooms, etc.

**Supplies:** office supplies used for the shelter program; cleaning supplies for the shelter building, etc.

## Eligible Activities- Operations

**Maintenance:** Carpet cleaning in shelter rooms; fixing plumbing issue in shelter; salary of maintenance worker; killing bed bugs, etc.

**Rent:** Lease of shelter building

**Security:** Monthly cost of security system for shelter; software for computer security

**Utilities:** Gas or electric bill for shelter building

**Fuel:** LP heating fuel for shelter

**Hotel/Motel Voucher:** Only eligible when no appropriate emergency shelter is available

## *Ineligible Activities- Operations*

- Recruitment or ongoing staff training
- Depreciation
- Costs associated with the organization rather than the facility (ex: advertisements, pamphlets about organization, survey)
- Public Relations or fund raising
- Staff training, entertainment, conferences, retreats
- Bad debts/late fees
- Mortgage payments for the shelter



# **ELIGIBLE EXPENSES: RAPID REHOUSING & HOMELESS PREVENTION**

# Housing Relocation & Stabilization Services: Financial Assistance Costs

ESG funds may be used to pay housing owners, utility companies, and other third parties for the following costs:

- ***Rental application fees:***

ESG funds may pay for the rental housing application fee that is charged by the owner to all applicants

- ***Security deposits:***

ESG funds may pay for a security deposit that is equal to no more than 2 months' rent.

- ***First month's rent:***

This line is used for non-recurring rental assistance used to obtain housing, or if landlord requires Security Deposit, First Month and Last Month rent upon move-in

- ***Last month's rent:***

*If necessary to* obtain housing for a program participant, the last month's rent may be paid from ESG funds to the owner of that housing at the time the owner is paid the security deposit and the first month's rent. This assistance must not exceed one month's rent and must be included in calculating the program participant's total rental assistance, which cannot exceed 24 months during any 3-year period.

# Housing Relocation & Stabilization Services: Financial Assistance Costs

- ***Utility deposits:***

ESG funds may pay for a standard utility deposit required by the utility company for all customers. Deposits are limited to the allowable covered utilities as noted below.

- ***Utility payments or arrears:***

ESG funds may pay for up to 24 months of utility payments per program participant, per service, including up to 6 months of utility payments in arrears, per service. A partial payment of a utility bill counts as one month.

- This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments.
- Eligible utility services are gas, electric, water, and sewage. No program participant shall receive more than 24 months of utility assistance within any 3-year period.

- **Moving costs:**

ESG funds may pay for moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.

# Housing Relocation & Stabilization Services – Financial Assistance

## Important Notes:

- Even though this is not rental assistance, an HQS Inspection must be completed for the above financial assistance items.
- NOT required to review Rent Reasonableness nor be within HUD FMR because rental assistance was not provided
- Case Management is required – at least 1 x month while funds are being provided

# Housing Relocation & Stabilization Services: Financial Services Costs

ESG funds may be used to pay the costs of providing the following services:

## ***Housing Search & Placement:***

Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing, include the following:

- Assessment of housing barriers, needs, and preferences
- Development of an action plan for locating housing
- Housing search
- Outreach to and negotiation with landlords/owners
- Assistance with submitting rental applications and understanding leases
- Assessment of housing for compliance with Emergency Solutions Grant (ESG)
- Requirements for habitability, lead-based paint, and rent reasonableness
- Assistance with obtaining utilities and making moving arrangements
- Tenant counseling

# Housing Relocation & Stabilization Services: Financial Services Costs

## *Housing Stability Case Management:*

- Using the coordinated entry system to evaluate needs of households applying for or receiving homelessness prevention or rapid re-housing assistance
- Conducting the initial evaluation including verifying and documenting eligibility (getting 3<sup>rd</sup> party documentation of homelessness), for individuals and families applying for rapid re-housing assistance
- Counseling
- Developing, securing, and coordinating services and obtaining Federal, State, and local benefits
- Monitoring and evaluating program participant progress
- Providing information and referrals to other providers
- Developing an individualized housing and service plan, including planning a path to permanent housing stability
- Conducting re-evaluations as required in the new progressive engagement standards
- This assistance **cannot exceed 30 days** during the period the program participant is seeking permanent housing and **cannot exceed 18 months** during the period the program participant is living in permanent housing.

# Housing Relocation & Stabilization Services: Financial Services Costs

## Housing Stability Case Management - Activities:

While providing RR or HP assistance to a program participant, the sub-recipient **must**:

- Meet with the participant **at least once monthly** to check in on housing related goals and ensure the household can access support and resources as needed
- Develop a **housing plan** (utilize HMIS) to assist the program participant in finding and retaining permanent housing after the ESG assistance ends

\* The Arizona Matrix tool (in HMIS) can be a helpful tool to establish goals for the housing plan

# Housing Relocation & Stabilization Services: Financial Services Costs

## ***Mediation:***

ESG funds may pay for mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the program participant from losing permanent housing in which the program participant currently resides.

## ***Legal services:***

Eligible subject matters also include landlord/tenant matters, and the services must be necessary to resolve a legal problem that prohibits the program participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which the program participant currently resides.

## ***Credit repair:***

ESG funds may pay for credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.



# Housing & Relocation Stabilization: Rental Assistance

## **Rental Assistance** (short and medium-term) :

- Sub-recipient may provide a program participant with up to 24 months of rental assistance during any 3-year period.

## **Rental Arrears** (up to 6 months max) :

- Payment of rental arrears consists of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.

# IMPORTANT NOTES: Rapid Rehousing & Homeless Prevention

## Use with other subsidies:

- **Except for a one-time** payment of rental arrears on the tenant's portion of the rental payment, **rental assistance cannot be provided** to a program participant who is receiving tenant-based rental assistance, or living in a housing unit receiving project-based rental assistance or operating assistance, **through other public sources** such as Section 8.
- Cannot pay rent payment if tenant is receiving HUD-VASH rental assistance. However, if HUD-VASH doesn't cover security or utility deposit, then ESG RRH can pay security up to the amount of 2 months rent and utility deposit.

# IMPORTANT NOTES: Rapid Rehousing & Homeless Prevention

## Rent restrictions:

- Rental assistance cannot be provided if the rent **exceeds** the Fair Market Rent established by HUD, as provided and **complies with HUD's standard of rent reasonableness**.

Rental Assistance can also include: utilities (excluding telephone), security deposit or other fees required under the lease, (other than late fees and pet fees) and, **if** the tenant pays separately for **utilities**, the monthly allowance for utilities (excluding telephone). Monthly allowances are released by IHCDA every year.

# IMPORTANT NOTES: Rapid Rehousing & Homeless Prevention

## **Rental Assistance Agreement:**

Rental assistance payments only to an **owner with whom the sub-recipient has entered into a rental assistance agreement**. The rental assistance agreement must set forth the terms under which rental assistance will be provided, including the requirements that apply under this section:

The rental assistance agreement must provide that during the term of the agreement, the owner must give your agency a copy of any notice to the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program participant.

## **Required lease forms:**

1. Required RAP between landlord and your agency
2. Required RAP Agreement between tenant and sub-recipient regarding payment and who is responsible for which housing costs and amounts-Useful to prevent confusion for the tenant.
3. Copy of signed lease between tenant and landlord.
4. **VAWA HUD form 5380.**

# IMPORTANT NOTES: Rapid Rehousing & Homeless Prevention

## Late Payments:

- The sub-recipient **must make timely payments** to each landlord/owner in accordance with the rental assistance agreement. The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease.
- The sub-recipient is solely responsible for paying late payment penalties that it incurs with non-ESG funds.

# IMPORTANT NOTES: Rapid Rehousing & Homeless Prevention

## Lease:

- Each program participant receiving rental assistance must have a legally binding, written lease for the rental unit, unless the assistance is solely for rental arrears. The lease must be between the owner and the program participant.
- Where the assistance is solely for rental arrears, **IHCDA still requires a copy of the lease to be included in the client's file.**

# IMPORTANT NOTES: Rapid Rehousing & Homeless Prevention

## Rent Reasonableness

Determines whether the rent being charged for an assisted unit is both:

- Reasonable in relation to rents being charged for comparable unassisted units with similar features and amenities; **and**
- Not more than rents currently being charged by the same owner for comparable unassisted units.

Utilize Affordablehousing.com/GoSection8 software for Rent Reasonable (refer to manual)

- Efficient
- Accurate
- Time saver
- No cost to you
- Training available
- Utilize Affordablehousing.com (formerly GoSection8) website to complete the rent reasonable checks. This is a requirement. We no longer accept paper forms of checks.

# IMPORTANT NOTES: Rapid Rehousing & Homeless Prevention

## Rent Calculation

### •Income to include:

Wages, salaries, overtime rates, bonuses, incentive payments, tips, self employment, AFDC, welfare, social security, unemployment, worker's compensation, child support, interest, dividends, Assets, etc. (See HUD Rental Calculation form for all Income inclusions and exclusions)

•Clients pay 30% of their adjusted gross income.

•Resources: Utilize Rental calculation manual provided by HUD (will be on IHCD website) Calculation Tool provided. Must have verification & documentation of expenses in client file.



# Administration-Rapid Rehousing & Homeless Prevention

Subrecipients can use up to 7.5% of their RRHP award to cover Administration costs.

## **Eligible Program Administration costs include the following:**

- Preparing program budgets and schedules, and amendments to those budgets and schedules
- Developing systems for assuring compliance with program requirements
- Preparing reports and other documents directly related to the program for submission to IHCD
- Evaluating program results against stated objectives
- Purchase or rental of equipment and office supplies necessary to deliver program services;
- Insurance, utilities, rent and maintenance of program office space

# CLAIMS OVERVIEW

# ESG CLAIMS PROCESS:

## Subrecipients submit claims via IHCD Online

- If you need access to IHCD Online, contact IHCD Claims: [claims@ihcda.in.gov](mailto:claims@ihcda.in.gov).

## Claim submissions due on the last day of each month

- Claim submission for June 2026 expenses is due on July 31, 2026
- If Subrecipient misses deadline, late claims approval is required.
- Late claims approval is granted on a case-by-case basis, in extenuating circumstances.

## Required components of a claim submission:

- Updated award budget
- Access to IHCD Online
- Completed claims narrative form
- Client IDs from HMIS (*if claiming expenses directly associated with a client*)
- Supporting documentation as highlighted on next slide

## ESG CLAIMS PROCESS:

### Supporting Documentation in claim submissions include:

- Documentation showing **proof of payment, with PII redacted**
- **Timesheets** for any staff time claimed; **mileage reports** for any mileage claimed by staff
- **Emails from CS Grants Team**
  - *Required if late claim approval was received OR are otherwise instructed to add an email to your claim submission*

# ADDITIONAL NOTES ON ESG CLAIMS PROCESS:

All subrecipients will receive an email granting blanket approval to back-claim from July 1, 2025

- **This email must be in each back-dated claim submission!**
- Failure to attach this email will result in your claim being denied.
- That email will include a deadline to which back-claiming can occur. Contact Niloofar or Jim if questions or issues arise.

ESG pays for actual time spent on ESG grant, not a pre-determined percentage of case management or admin salary

Using a cost allocation plan is not permitted unless approved in advance by IHCDA

One month of expenses = one claim submission

- 12-month contract = 12 total claims maximum

Start with earliest month you intend to claim for, then move to the next chronological month

- If you skip a month, you will forfeit the right to claim for the month you skipped.

# BUDGET MODIFICATION AND AMENDMENTS:

## Two ways to modify budgets:

- Line-item amendments within your funding stream
- Throughout multiple funding streams:
  - *Applicable for moving funding between Rapid Rehousing, Homelessness Prevention, and Administration only!*

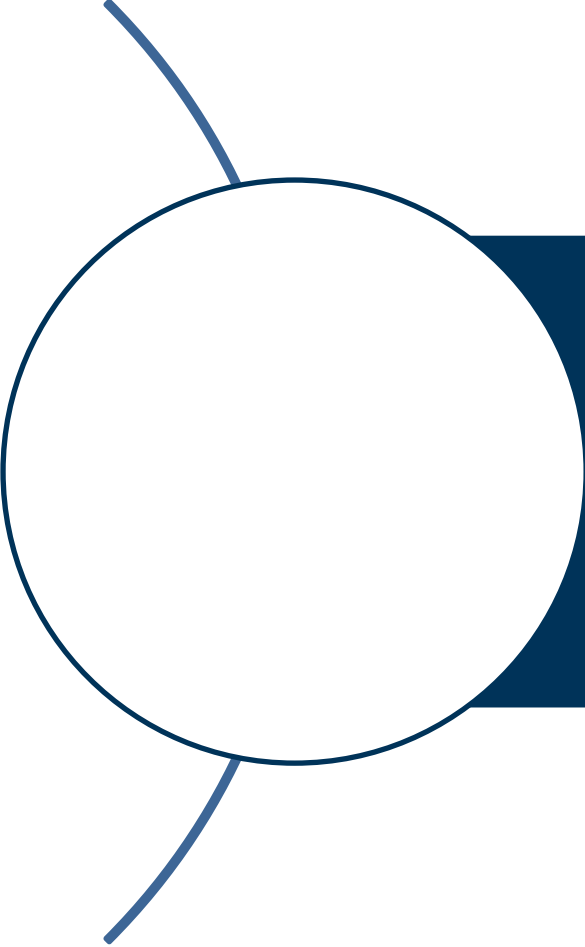
## No more than 3 budget modifications per award

- If circumstances arise in which more modifications are required, please contact Niloofar or Jim.

## Be judicious in selecting when you do a modification

## ESG Budget modification forms are on IHCD's ESG webpage

## CLAIMS-RELATED CONTACT INFORMATION:



**IHCDA Claims for  
access to IHCDA  
Online and Questions:  
[claims@ihcda.in.gov](mailto:claims@ihcda.in.gov)**

# HMIS REQUIREMENTS:



# INTRO TO HMIS:

**HMIS = Homelessness Management Information System**

HUD's system used to enter client level data and generate reports for a variety of programs

- Secure, confidential Web-based data collection system that tracks data on the nature and extent of homelessness in your individual program(s), your community, and also statewide and nationally.
- User-friendly, customizable, easy to **generate reports**
- **Case Management Tool:** Can track employee hours, client goals, outcomes, and manage case loads
- **Arizona Self-Sufficiency Matrix-** built in vulnerability matrix to quantify clients' progress over time

**IHCDA's ESG program requires the use of HMIS for data entry and analysis**

# HMIS REQUIREMENTS AND EXPECTATIONS:

## Ensure data timeliness

- Five business days within initial client intake, annual recertification, and exit

## High data quality

- Ensure complete collection of data as much as possible

## Participation in HIC/PIT

- **Homeless Inventory Count:** Counts the number of beds and units dedicated to serving people experiencing homelessness
- **Point-In-Time Count:** Counts the number of people experiencing homelessness on a single night in January

## HMIS AND COORDINATED ENTRY:

Assessments are done through Collaborative Housing Assessment Tool (CHAT) on HMIS.

ESG Shelters and Rapid Rehousing **MUST** participate in CE

HP does not have to participate in CE.

Street Outreach awardees are strongly encouraged to participate in CE.

**Contact CE Lead in your Region!**

## HMIS ESG REPORTING REQUIREMENTS:

Subrecipients that utilize Essential Services funds are required to document case notes and services in HMIS or DV Client Track for all program participants

Enter only ENROLLED/ELIGIBLE persons into HMIS for ESG RR & HP Program.

# DOMESTIC VIOLENCE DATABASE REQUIREMENTS:

**Must have comparable system to HMIS system:**

- Collect same universal data elements
- Produce aggregate, client-level, unduplicated reports

**DV Client Track is available to DV shelters who cannot meet the requirement with their current database.**

## POINT-IN-TIME COUNT PARTICIPATION EXPECTATIONS:

### Participation expectations:

- Update Housing Inventory Chart (HIC) form in November
- Communicate and respond timely with PIT Coordinator and Regional Planning Council Chair requests
- Keep HMIS or Client Track Data up-to-date
- Pull PIT Report from HMIS/CT as required, check data carefully, send to appropriate IHCD staff on time

## HMIS CONTACTS:

### Resources on HMIS

- [IHCDA Website: HMIS ClientTrack and DV ClientTrack](#)
- Contact Information:
  - HMIS HelpDesk: [HMIShelpdesk@ihcda.in.gov](mailto:HMIShelpdesk@ihcda.in.gov)
  - DVClient Track HelpDesk:  
[DVHelpdesk@ihcda.in.gov](mailto:DVHelpdesk@ihcda.in.gov)

# DOCUMENTATION REQUIREMENTS:



## DOCUMENTATION OF HOMELESS STATUS:

**Two options to document homeless status:**

The HUD Homeless Documentation form

Another form of documentation from wherever the participant was referred – third party verification obtained as much as possible

- Documentation also has space for client and staff signatures verifying homeless status

# Documenting homelessness & Imminent Risk

## Documentation Sources (in order of preference):

- 3<sup>rd</sup> Party Written Verification – notices/statements on letterhead, signed & dated; eviction notices
- 3<sup>rd</sup> Party Oral Verification – recorded oral statement by intake staff, 3<sup>rd</sup> party providing verification, signed and dated by intake staff as true and complete
  - Recommend standardized form for program
- Intake Observations – intake staff notes observations & assessments, signed and dated by intake staff as true and complete
  - Recommend standardized form for program
- Self Certification – individual/head of household statement, written, signed and dated as true and complete. Okay for Criteria 4 category of homeless

# Required Documentation for Rapid Rehousing & Homeless Prevention

1. **Homeless Documentation** – utilize HUD Homeless Documentation Form or HMIS intake form
2. **Coordinated Entry Assessment** – CHAT // Client Prioritization Policy Documentation for HP
3. **HMIS Intake**
4. **Arizona Self Sufficiency Matrix** – inside HMIS
5. **Housing Plan** – in HMIS system
6. **Housing Inspection** – Housing Quality Standards (HQS) ([\*NSPIRE\*](#) implementation delayed until Oct 1, 2026)
7. **Lead Based Paint Inspection** - signed acknowledgment of receipt of lead-based paint disclosures should be in client file.
8. **Rent Reasonable check** - Utilize Affordablehousing.com/formerly GoSection8
  - Copy/print and place in file
  - Contact ESG Program Manager for log-in credentials for Affordablehousing.com/GoSection8
  - Review Affordablehousing.com/GoSection8 user manual

**\*Rent cannot be over FMR** – utilize most up to date FMR

# Required Documentation for Rapid Rehousing

9. **Income information collected** – place in file

- **Income calculation form (Now on HMIS!)**
- **Zero Income form**

10. **Utility Allowance-** Only needed if utilities are not included in rent

11. **Lease Agreement Forms** –

- RAP (rental assistance program contract) – between tenant & sub-recipient;
- RAP between landlord & sub-recipient

12. Save a copy of the tenant's **lease with the landlord** in the file.

13. Provide agency **termination policy & procedures** and appeals process.

- should have signed acknowledgement of receipt of policy.

14. **Case Management required monthly.** Utilize HMIS service case management for time spent with each household/person

15. **Required VAWA Forms – Forms 5380-5383.** Forms available on IHCD's [website](#)

## REQUIREMENTS - LEAD BASED PAINT

**Reminder: Ensure units comply with lead-based paint regulations during your inspections!**

Provide “Protect Your Family from Lead in Your Home” booklet to all prospective families in Rapid Rehousing.

Lead-Based Paint Exemption Form is required for all units.

- Lead-Based Paint Disclosure Form and Lead-Based Paint Ongoing Agreement Form are only required in certain instances.

# IHCDA RESOURCES ON LEAD-BASED PAINT REQUIREMENTS:

Training completed by former IHCDA staff:

- <https://attendee.gotowebinar.com/recording/7569524463726316716>

COMING SOON: Publication of “Lead-Based Paint Requirement Flowchart” on IHCDA’s website.

- Release of this resource will be announced once finalized.

## RECORD RETENTION REQUIREMENTS:

Per regulation (24 CFR 576.500(y)), records must be retained for the following years:

- Financial Records: All records pertaining to each fiscal year of ESG funds must be retained for the **greater of five (5) years following the end of the award period.**
- Client Records: Documentation of each program participant's qualification as a family or individual at risk of homelessness, or as a homeless family or individual, and other program participant records **must be retained for 5 years after the expenditure of all funds** from the grant under which the program participant was served

Copies made by microfilming, photocopying, or similar methods may be substituted for the original records.

# REPORTING REQUIREMENTS



## ESG REPORTING REQUIREMENTS:

Three main reports  
required for the  
ESG program

**Semi-Annual  
Match/Spending  
Report\*** due  
January 31, 2026

**Annual  
Match/Spending  
Report\*** due July  
31, 2026

**CAPER** – due July  
31, 2026

## ESG MATCH PRINCIPLES:

Requirement: 100% match of amount expended in each award.

Match funds applied to an award must fall within the award period.

Match funds **must not** come from ESG funding; match funding must come from other federal, state, local and private sources. (2 CFR 200.306(b)(5))

Funds used as match can only be counted as match once.

Only ESG eligible expenses can count as match.

## ESG MATCH SOURCES:

Three types of match:

- Cash
- In-kind goods
- In-kind services

Each type of match requires a form of supporting documentation:

- Match Commitment Letter
- Memorandum of Understanding (MOU)

## ESG MATCH: CASH:

### Examples of eligible cash match:

- CDBG, CSBG funding
- Non-HUD federal funding
- Local and state government funding
- United Way
- Local foundations
- Case management provided by sub-recipient, not already paid for by ESG
- Private, monetary donations

### Required supporting documentation:

#### Match Commitment Letter signed/dated on your agency's letterhead:

- Amount of cash to be provided to the recipient for the project
- Specific date the cash will be made available
- The actual grant and fiscal year to which the cash match will be contributed
- Time period during which funding will be available
- Allowable activities to be funded by the cash match

## ESG MATCH: IN-KIND GOODS:

### Examples of eligible in-kind goods:

- Donations of goods and supplies
- Volunteer time

### Required supporting documentation:

#### Match Commitment Letter signed/dated on your agency's letterhead:

- Estimated amount of cash to be provided to the recipient for the project
- Specific date the “cash” (or in-kind good) will be made available
- The actual grant and fiscal year to which the match will be contributed
- Time period during which “funding” (or in-kind good) will be available
- Allowable activities to be funded by the in-kind good

## ESG MATCH: IN-KIND SERVICES:

### Examples of eligible in-kind services:

- Case management provided by a third party (i.e. not your agency's staff)
- Training or services provided by a third-party vendor/contractor

### Required supporting documentation:

#### Formal Memorandum of Understanding (MOU):

- Who will provide the services, value per hour of the services provided and how that rate was determined (i.e. fair market value or in comparison to charges for non-donated services)
- 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 IHCDAA with the match report.

## ESG MATCH REPORT:



**Subrecipient reports sources of match.**

**Subrecipient also submits supporting documentation alongside any match commitment letters and MOUs**

- Copies of bank statements
- Internal tracking to show match was received and used for eligible activities
- Documentation of case management used as match
- Staff timesheets if claiming match on staff time

## ESG REPORTING REQUIREMENTS – CAPER:

Consolidated Annual Performance and Evaluation Report is required by HUD and **due July 31, 2026.**

Subrecipients will run report in HMIS/DV Client Track.

Subrecipient will upload the report to SAGE, HUD's reporting system, via link sent by the Formula Grants Manager.

**Any agency that submits a late report will be penalized during the next application period.**



## TIPS TO SUCCESSFULLY COMPLETE CAPER:

**Don't wait until last minute!** Run report in HMIS/DV Client Track sooner rather than later.

Utilize trainings provided by HMIS team to improve data quality and timeliness **throughout** the award term.

Run a CAPER report every quarter to identify any errors that could arise during reporting season.

Contact IHCDa if questions or issues arise.

# COMPLIANCE AND MONITORING

## COMPLIANCE AND MONITORING:

**Purpose:** To help subrecipients maintain and improve their administration of ESG assistance.

25% of programs are monitored each program year, as required by IHCDa's signed agreement with HUD

1<sup>st</sup> time awardees must be monitored during the grant year.

# COMPLIANCE AND MONITORING:

The Compliance Monitors will send an email notifying you that a monitoring is taking place.

They may ask to schedule a call and/or request additional documentation.

Be mindful of deadlines to get documentation submitted to Compliance Monitors.

Emphasis on compliance with federal requirements such as:

Client file review for case management and required documentation

Financial review including match reporting and claims

Utilization of Coordinated Entry and HMIS

## COMPLIANCE AND MONITORING:

Eventually, Subrecipients will receive a report detailing **concerns** or **findings**. Subrecipients are then responsible for addressing them until they are cleared.

Please note that if you don't resolve findings in a timely manner, you may be unable to submit claims.

## TIPS TO ENSURE AWARD COMPLIANCE:

Meet your deadlines to submit claims and requested documents/reports!

Ensure data timeliness and accuracy by creating new or updating existing client entries in HMIS.

Stay up-to-date on VAWA requirements and interweave any required forms into your work with clients.

Ensure confidentiality of client files and information.

**Communication – when in doubt, ask IHCD staff!**

# CONTACT INFORMATION:

- Community Services Team Email: [communityservices@ihcda.in.gov](mailto:communityservices@ihcda.in.gov)
- Community Services - Formula Grants Team:
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- DVClient Track HelpDesk: [DVHelpdesk@ihcda.in.gov](mailto:DVHelpdesk@ihcda.in.gov)
- IHCD A Online Claims Questions: [claims@ihcda.in.gov](mailto:claims@ihcda.in.gov)

**QUESTIONS**