



ESG-CV Program Manual & Desk Guide

January 28, 2022 v.4



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Introduction

Purpose

The Coronavirus Emergency Solutions Grant (ESG-CV) is intended to be used to prevent, prepare for, and respond to coronavirus, among individuals and families who are homeless or receiving homeless assistance and to support additional homeless assistance and homelessness prevention activities to mitigate the impacts created by coronavirus. Preventing coronavirus means to prevent the initial or further spread of the virus to people experiencing homelessness, people at risk of homelessness, recipient or subrecipient staff, or other shelter or housing residents. Preparing for coronavirus means to plan to keep people healthy and reduce the risk of exposure to coronavirus and avoid or slow the spread of disease prior to or during a coronavirus outbreak.¹ Responding to coronavirus means to act once coronavirus has spread to people experiencing homelessness, service providers, or once individuals and families lose or are at risk of losing their housing as a result of the economic downturn caused by coronavirus.

Homeless assistance and homelessness prevention means using a low barrier, housing-focused approach to ensure that homelessness is rare, brief, and non-recurring. This includes (1) engaging homeless individuals and families living on the street; (2) improving the number and quality of emergency shelters for homeless individuals and families; (3) helping operate these shelters; (4) providing essential services to shelter residents, (5) rapidly rehousing homeless individuals and families, and (6) preventing families and individuals from becoming homeless to mitigate the impacts created due to the coronavirus.²

Establishment of Funds

Emergency Solutions Grant (ESG) funds were established by Subtitle B of Title IV of the Stewart B. McKinney-Vento Homeless Assistance Act (Public Law 100-77, Public Law 100-628) as amended by the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act)³ which authorized the ESG program for the purpose of providing assistance to persons who are homeless or at-risk of homelessness.

The Coronavirus Aid, Relief, and Economic Security (CARES) Act of 2020 provided the Department of Housing and Urban Development (HUD) up to \$3.96 billion in ESG supplemental funding to prevent, prepare for, and respond to coronavirus, among individuals and families who are homeless or receiving

¹The definitions for preventing, preparing for, and responding to coronavirus are further defined in [Appendix D](#).

²Homelessness assistance or prevention that does not **directly** prevent, prepare for, or respond to coronavirus among individuals and families who are homeless or receiving homeless assistance must be used to mitigate the impacts created by coronavirus to be eligible for ESG-CV funding.

³ Full text for the McKinney-Vento Homeless Assistance Act as amended by the HEARTH Act of 2009 can be found [here](#).

homeless assistance and to support additional homeless assistance and homelessness prevention activities to mitigate the impacts created by coronavirus. On April 2, 2020, HUD allocated \$1 billion of this funding nationwide with special ESG-CV funds to respond to the current coronavirus health pandemic. On June 9, 2020, HUD allocated the remaining \$2.96 billion with ESG-CV funds as well.⁴

Regulations and Authority

The IHCD A ESG-CV program is administered under the provisions of the HUD regulations within Title 24 Code of Federal Regulations (CFR) [Part 576](#), unless otherwise stated in [CPD-21-08](#) titled “Waivers and Alternative Requirements for the Emergency Solutions Grants (ESG) Program Under the CARES Act”.⁵ They are also subject to the agency’s executed grant agreement and the ESG-CV Desk Guide. Sub-recipients are highly encouraged to review all HUD ESG-CV program requirements. IHCD A has flexibility in certain areas of administering the ESG-CV Program and may establish more detailed requirements than those required by HUD. Where differences occur, Sub-recipients must comply with IHCD A’s requirements reflected in the grant agreement and ESG-CV Desk Guide.

As the coronavirus health pandemic and its societal impact continues to change over time, the regulations of ESG-CV may be periodically updated. These changes may come from the CDC, HUD, DSS, IHCD A, or other authorities. IHCD A will update the ESG-CV Desk Guide and provide additional trainings and forums as necessary. **However, it remains the responsibility of each funded organization to ensure that they are up to date on these changes. Failure to comply with updated regulations may result in an organization being found out of compliance and/or having their funding suspended.**

Eligible Program Components

Street Outreach (SO)

Intended to meet the immediate needs of unsheltered homeless individuals and families by connecting them with emergency shelter, housing, and/or critical health services.

Standard Emergency Shelter (SES)

Intended to increase the quantity and quality of standard emergency shelter provided to homeless individuals and families by paying for operating and essential services expenses.

Temporary Emergency Shelter (TES)

Intended to increase the quantity and quality of temporary emergency shelter provided to homeless individuals and families by paying for operating and essential services expenses. **Temporary Emergency Shelter Activities were not included in the Substantial Amendment and are not eligible activities under the In-502 ESG-CV program.**

Homelessness Prevention (HP)

Intended to prevent households from becoming homeless through rental assistance and housing relocation and stabilization services.

⁴ The allocations were announced in [Notice 20-049](#) and [Notice 20-077](#), respectively.

⁵ CPD-21-08 was published 7/19/21 and replaced the previous Notice (CPD-20-08).

Rapid Rehousing (RRH)

Intended to quickly move homeless individuals and families to permanent housing through rental assistance and housing relocation and stabilization services.

Homeless Management Information System (HMIS)

Intended to support ESG-CV recipient participation in the HMIS (or comparable database for victim service providers) collection and data analysis of households that are homeless or at risk of homelessness.

GRANT ADMINISTRATION

General Information

Contact

The point of contact for ESG-CV-related concerns is the ESG-CV Grant Analyst. Please direct all questions, concerns, and updates to the ESG-CV Grant Analyst, with the exception of payment requests. Claims for payment requests should be submitted electronically by completing and uploading the appropriate forms to IHCDOnline. Any questions regarding claims should be directed to claims@ihcda.in.gov.

ESG-CV Grant Analyst

Amanda Fronek

Indiana Housing & Community Development Authority
30 S Meridian St, Suite 900
Indianapolis, IN 46204

Email: communityservices@ihcda.in.gov

Website

Information pertaining to IHCD's ESG-CV program can be found on the following website: <https://www.in.gov/ihcda/covid-19-resources/esg-hubs/>. Additional resources can be found on the IHCD program partners page at <https://www.in.gov/ihcda/program-partners/>.

Timeline

The following timeline lists the key dates for the ESG-CV grant period, which are also detailed in the grant agreement. Sub-recipients are responsible for knowing these dates as well as communicating them to all applicable staff.

Grant Billing Period Begins March 6, 2020	March 6, 2020
Quarter 1 (Q1)	Start to September 30, 2020
Q1 Financial Unique Activities Report Deadline	October 23, 2020
Q1 Quarterly CAPER Deadline	October 23, 2020
Quarter 2 (Q2)	October 01, 2020 – December 31, 2020
Q2 Quarterly and Cumulative CAPER Deadline	January 15, 2021
Q2 Financial Unique Activities Report Deadline	January 15, 2021
Quarter 3 (Q3)	January 01, 2021 – March 31, 2021
Q3 Quarterly and Cumulative CAPER Deadline	April 23, 2021
Q3 Financial Unique Activities Report Deadline	April 23, 2021
Quarter 4 (Q4)	April 01, 2021– June 30, 2021
Q4 Quarterly and Cumulative CAPER Deadline	July 23, 2021
Financial Unique Activities Report Deadline	July 23, 2021
Quarter 5 (Q5)	June 01, 2021 – September 30, 2021
50% Spending Deadline	September 30, 2021
Q5 Quarterly and Cumulative CAPER Deadline	October 23, 2021
Q5 Financial Unique Activities Report Deadline	October 23, 2021
Quarter 6 (Q6)	October 01, 2021 - December 31, 2021
50% Spending Deadline (if approved)	December 31, 2021
Q6 Quarterly and Cumulative CAPER Deadline	January 23, 2022
Q6 Financial Unique Activities Report Deadline	January 23, 2022
Quarter 7 (Q7)	January 01, 2022 – March 31, 2022
80% Spending Deadline	March 31, 2022
Q7 Quarterly and Cumulative CAPER Deadline	April 23, 2022
Q7 Financial Unique Activities Report Deadline	April 23, 2022
Quarter 8 (Q8)	April 01, 2022– June 30, 2022
Q8 Quarterly and Cumulative CAPER Deadline	July 23, 2022
Q8 Financial Unique Activities Report Deadline	July 23, 2022
Quarter 9 (Q9)	July 01, 2022 – September 30, 2022
Close Out Deadline*	October 23, 2022
Q9 Quarterly and Cumulative CAPER Deadline	October 23, 2022
Q9 Financial Unique Activities Report Deadline	October 23, 2022

Financial Processes

Funding Period

All ESG-CV funding provided to subrecipients must be used for expenses that are incurred and paid for on or after January 21, 2020 and before August 31, 2022.

Request for Payment / Claims Process

ESG-CV grants are provided on a reimbursement basis. Sub-recipients incur eligible costs and then request reimbursement by IHCD. Once the sub-recipient has incurred costs on eligible ESG-CV activities, it may request ESG-CV funds by submitting a claim. Claims should be submitted monthly for a total of 12 claims per fiscal year. Each claim represents one month of bills that were incurred or paid during that month.

Claims must be submitted through IHCDOnline at <https://online.ihcda.in.gov>. Required supporting documentation (as outlined below) must also be submitted electronically through IHCDOnline.

Submission Requirements

Funded agencies must submit complete payment requests electronically by completing and uploading the documents to IHCDOnline via follow-up forms assigned to the organization.

Sub-recipients will need to verify that all expenses were used to either (1) prevent, prepare for, or respond to coronavirus, among individuals and families who are homeless or receiving homeless assistance or (2) support additional homeless assistance and homelessness prevention activities to mitigate the impacts created by coronavirus.⁶ Recipient payment requests are typically paid out in 30 days. All claims shall be submitted via IHCDOnline.

Common Reasons for Discarded Claims

- Certificate of Insurance (COI) has expired
- Ineligible expenses
- Unauthorized signature

Please submit all claims electronically via IHCDOnline at: <https://online.ihcda.in.gov>.

Return of Funds, Repayments, and Adjustments

There are three types of situations in which funding must be adjusted and/or returned to IHCD. A return of funds (ROF) transaction is initiated by the State to return funds paid to an award subrecipient. An ROF claim may occur when an IHCD Monitor finds discrepancies with an agency's claims. Typically, the Monitor will send correspondence to the agency on what they need to pay back as well as directions on submitting an ROF for that amount.

A repayment transaction consists of a subrecipient repaying funds to the State. The transaction will initiate a repayment from the award subrecipient that will go back into the award amount. This will offset a subrecipient payment while the funds that are repaid will be available in the award budget and remaining balance. A repayment claims typically come in towards the end of the program year and may

⁶ Additional information on documenting COVID-19 tiebacks can be found in [Appendix C](#).

be due to allocations not being accurate or there is an issue on the subrecipient's end regarding their budget. It is typically initiated by agency and may be add back into their budget, unlike an ROF.

An adjustment transaction allows an award subrecipient to make corrections to line items within an award. An adjustment will have both positive and negative line-item amounts and must have a net total of zero. No funds are drawn or paid as part of an adjustment transaction. Adjustment Claim Requests must now follow a new procedure that may differ from previous adjustment claim requests in the past. The new process requires that the fiscal staff member send an email to Lisa Ditchley, Financial Operations Manager, at lditchley@ihcda.in.gov with the following information:

Subject Line: Adjustment Claim Request

- The following information should be included in the email:
 - The Award #
 - The total amount and the budget category the previously claimed charges are being moved from.
 - The total amount(s) and the budget category(s) those charges are being moved to.
 - A brief description of the request (e.g., Monitoring states these charges should have been claimed as Admin rather than A16)

Once received and approved, the claims department will set up the request within IHCD Online and respond to that email with the Adjustment Claim number. Subrecipients will then have the opportunity to upload the ledger and submit for final review and approval.

When any of these situations occur, you will contact the ESG-CV Grants Analyst Amanda Fronck so that she can help facilitate a smooth transition process.

Spending Plans and Deadlines

IHCDA requires that each subrecipient submit a spending plan to ensure ESG-CV funding is spent to address the public health and economic crises caused by the coronavirus. This spending plan must provide justification and verification that the subrecipients comply with the following requirements and benchmarks:

1. The spending plan must document that the subrecipient will either expend 50% of its funding by the end of September 2021 or substantially demonstrate that it will expend 50% of its funding by December 31, 2021.
2. The subrecipient will expend 80% of its funding by March 31, 2022, and 100% of its funding by the end of the grant year

Sub-recipients are further required to meet the following spending deadlines:

- Request and be approved for reimbursement of at least 25 percent (25%) of their total grant award amount by March 31, 2021
- Request and be approved for reimbursement of at least 50 percent (50%) of their total grant award amount by September 30, 2021

- Request and be approved for reimbursement of at least 80 percent (80%) of the total grant award by March 31, 2022
- Request and be approved for reimbursement of 100 percent (100%) of the total grant award by August 31, 2022

IHCDA has the discretion to recapture a portion or all remaining ESG-CV funds as of these deadlines.

Budget Modifications

ESG-CV sub-recipients may spend ESG-CV funds on any eligible activity within the funding component they were awarded (e.g., Rapid Rehousing dollars may be spent on any eligible Rapid Rehousing activity as outlined in [24 CFR 576 Subpart B](#) or [CPD-21-08](#)). In certain instances, sub-recipients may request modifications to the original budget provided in the grant agreement in order to move funds to other activities, subject to IHCDA approval. Sub-recipients must submit the modification request form via email to the IHCDA ESG-CV Grant Analyst at communityservices@ihcda.in.gov outlining the proposed modification.

Subrecipients will be contacted via email by the ESG-CV Grant Analyst once the modification is approved and processed. The original copy must be received and executed by IHCDA before the budget change is finalized. Modifications do not change the grant amount, only the component in which funding can be spent.

Budget Amendments

ESG-CV sub-recipients may request an amendment to the original budget approved in the grant agreement in order to receive additional funding, subject to IHCDA approval. Sub-recipients must submit a request in writing via email to the IHCDA ESG-CV Grant Analyst at communityservices@ihcda.in.gov outlining the proposed amendment. This email should detail the original award amount, the additional funds requested, the new award amount, and descriptions of the expenses that can be reimbursed with the additional funds. If the request is approved, a grant amendment agreement will be sent to the subrecipient for review and signature. The original copy must be received and executed by IHCDA before the budget change is finalized.

Homeless Management Information System

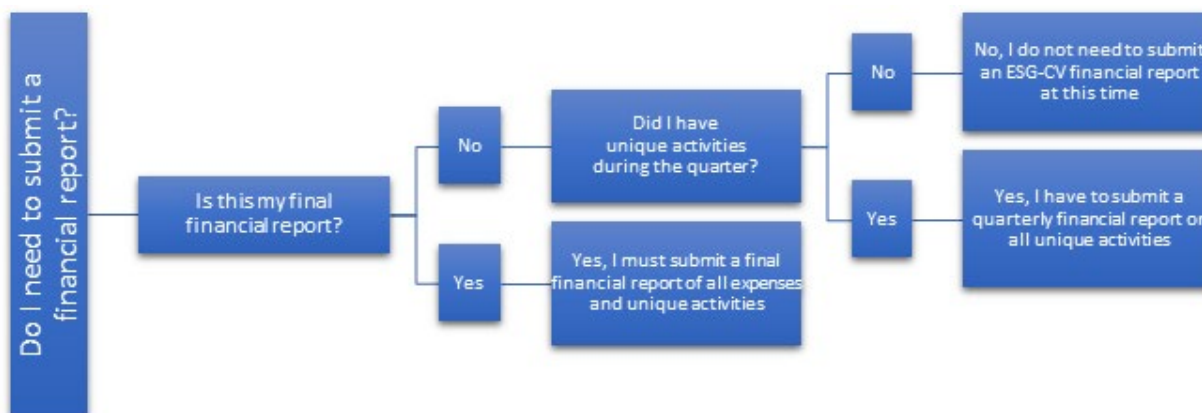
The Homeless Management Information System (HMIS) is a database that records and stores client-level data regarding the delivery of housing and services to households who are homeless and/or at-risk of homelessness. ESG-CV Sub-recipients are required to enter data on all persons served into the HMIS recognized by the Continuum of Care (CoC). Sub-recipients serving victims of domestic violence are required to enter data into DV Client Track or a “comparable database” in accordance with HUD’s standards on participation, data collection, and reporting. Sub-recipients are responsible for ensuring that all data collection efforts within HMIS and any comparable databases are in compliance with the [HUD HMIS Minimum Data Standards](#); therefore, Sub-recipients should work with their HMIS lead agencies and comparable database providers to ensure they are trained on proper data entry and are consulting with their provider regularly regarding any issues or questions.

Reports

Quarterly Consolidated Annual Performance Evaluation Report (QCAPER)

HUD requires submission of a Quarterly Consolidated Annual Performance Evaluation Report (QCAPER) through a Comma Separated Value (CSV) export from the HMIS or comparable database for all ESG-CV funded projects. These CAPERs run from the beginning of the reporting quarter to the end of the reporting quarter.

Generally speaking, these reports will be created and submitted by the IHEDA Community Services division. The data requirement to submit CSVs by project type for all data in HMIS will be generated by the HMIS Team. The financial report will be submitted by the Grants Team. **Subrecipients are required to submit a quarterly financial report ONLY if they utilized any unique expenditures.** This report should provide a breakdown of those expenses and a description of how they were used. If you are uncertain that you need to submit a financial report, IHEDA has prepared a decision tree that will help you determine whether you need to submit it:



A brief outline and description of some possible unique activities can be found in the [COVID-19 Homeless System Response: Grants Management: ESG-CV Notice Summary](#) provided by HUD.

Monitoring

In order to track a subrecipient's program compliance, ensure accurate spending of ESG-CV funds, prevent fraud and abuse, and to identify technical assistance needs, IHEDA staff will monitor subrecipients by conducting either a site visit or desk review. In addition to the formal monitoring, all subrecipients are continually monitored through claims review and progress data collected during the HUD required quarterly ESG-CV reporting.

While the executive order declaring a public health emergency is in place, IHEDA Community Services will conduct required monitoring remotely rather than through onsite visits, in accordance with state guidelines and travel restrictions. Monitoring may also be completed on a reduced schedule for a period of time during an emergency or public health crisis. In order to decrease the burden on organizations during an already challenging time, monitoring may choose to focus on reviews that can be conducted with as little time and effort as possible on the part of the subrecipient such as a focus on claims review and financial review of the most recent single audit submitted. If such a review indicates

the need for a more formal monitoring of the program area of the organization, IHCD staff will work with the subrecipient to obtain documentation such as client files, program policies, etc. through secure technology and will attempt to reduce the amount of documentation requested whenever possible. In addition, there may be some flexibility allowed on the timeline to submit requested items if subrecipient access is limited.

When identified for formal monitoring, subrecipients will be notified a minimum of two weeks prior to the scheduled monitoring. Monitoring is conducted by the Program Analyst and Compliance Analyst using the appropriate Monitoring Tool for the sub-recipient project, which will be provided when they receive notification of the scheduled monitoring. Once monitoring is completed the subrecipient is notified via the monitoring results letter. This letter will detail any concerns or findings as well as the required corrective action to be taken. Sub-recipients are given 30 days to respond.

Environmental Review

ESG-CV subrecipients are required to comply with the National Environmental Policy Act (NEPA) to limit the potential environmental impacts of a project. The only projects that require environmental review for this purpose are construction or renovations of standard emergency shelters, which are not eligible under the IHCD ESG-CV program. Therefore, all ESG-CV activities will be either categorically excluded or exempt from an environmental review. This includes temporary emergency shelters that have been determined by the State or local health officials to be necessary to prevent, prepare for, and respond to coronavirus. As the "Responsible Entity" (as defined in 24 CFR 58.2), IHCD is solely responsible for the environmental review, including documenting whether an activity is categorically excluded or exempt. Funded organizations are expected to comply with and provide all necessary documentation to IHCD with regard to environmental review requirements and may be held out of compliance for not doing so.

Area-Wide Systems Coordination

Coordination with Other Targeted Homeless Services

To ensure funds are deployed quickly to address the immediate public health crisis and prevent the spread of coronavirus, the Coordination with Other Targeted Homeless Services requirements at 24 CFR 576.400(b) and 24 CFR 576.400(c) are waived. IHCD encourages subrecipients to coordinate and integrate ESG-CV activities with mainstream housing, health, social services, employment, education, and youth programs, as well as programs targeted to homeless people in its service area to provide a strategic, community-wide system to prevent and end homelessness. Please refer to the ESG regulations 24 CFR 576.400(b) and 24 CFR 576.400(c) for a full list of these programs.

Coordinated Entry System

With respect to costs incurred between January 21, 2020 and June 30, 2020 that are allowable under CPD-21-08 but not under 24 CFR 576 Subpart B, the requirements to use the CoC's centralized or coordinated assessment under 24 CFR 576.400(d), administer the assistance in accordance with written standards as provided under 24 CFR 576.400(e), and participate in HMIS under Section 416(f) of the McKinney-Vento Act and 24 CFR 576.400(f) are waived for either (1) the first 60 days of the project's operation or (2) until June 30, 2020, whichever is shortest. For example, if a project started May 18, 2020 that is eligible under CPD-21-08 but not under 24 CFR 576 Subpart B, then the waivers only apply

for the first 43 days of the project’s operation since May 18, 2020 is less than 60 days before the June 30, 2020 deadline.

When the waivers above are not applicable, the requirements to use the CoC’s centralized or coordinated assessment under 24 CFR 576.400(d), administer the assistance in accordance with written standards as provided under 24 CFR 576.400(e), and participate in HMIS under Section 416(f) of the McKinney-Vento Act and 24 CFR 576.400(f) still apply.

Each ESG-CV-funded non-victim services provider within the IN BoS CoC's area must use that assessment system to ensure consistent screening, assessment, prioritization and referral of program participants (24 CFR 576.400(d)). Each provider must also work with the CoC to ensure that the screening, assessment, and referral of program participants are consistent with the required program guidelines. Victim services providers may choose not to use the CoC's coordinated entry system.

General Guidance:

- Regions should make every effort to update prioritization policies to include how individuals affected by COVID-19 currently or on the CDC’s list of vulnerable populations will have a higher prioritization.
 - Regions should make every effort to reduce assessment questions to what is necessary to prioritize households.
 - The CE Committee will provide a truncated list of assessment questions to use instead of the VI-SPAT to rapidly rehouse or prevent homelessness.
- Regions may consider reducing barriers to housing, such as documentation requirements, unless required by funding source guidelines (e.g. CARES act funding). Regions should take a proactive approach in engaging landlords and health officials during this time to quickly house individuals.
- Regions should update their diversion tactics to provide flexible assistance to help people who can move in with friends, family, temporary rentals and/or relocations will be provided on a first-come, first-serve basis to help people leave crowded shelter conditions.
- Regions should collaborate closely with mainstream systems such as jails, prisons, and hospitals that are discharging individuals to ensure at-risk and vulnerable populations have identified housing resources or access to Coordinated Entry.
- Clients with multiple priorities or risk factors should be moved to front of prioritization.

CoC BoS Specific Guidance:

Funding Sources	COVID-19 Updates
Permanent Supportive Housing	<p>Shortened assessment should be used to move individuals more quickly off the prioritization list. Prioritization should still be for those who are chronically homeless with a disability.</p> <p>Individuals listed as most vulnerable based on CDC guidance on COVID-19 should be a higher priority in the assessment process.</p>

	<p>Regions should ensure an isolation option is available to any individual who is chronically homeless and affected by COVID-19 if housing cannot be accessed quickly.</p>
<p>Rapid Re-Housing</p>	<p>Shortened assessment may be used to ensure individuals stay or can be rapidly housed to avoid exposure to COVID-19.</p> <p>Individuals listed as the most vulnerable by the CDC should be prioritized to move from congregate shelters.</p> <p>First come first serve basis can be used to provide this assistance, regions should continue to prioritize those fleeing domestic violence and people who fit the current PSH prioritization categories.</p>

<p>Homeless Prevention-CARES Act, IHCD A Intake</p>	<p>Shortened or no assessment option may be used for homeless prevention due to high need of rental assistance for individuals affected by COVID-19.</p> <p>IHCD A Intake: First come first serve process will be used with the IHCD A intake process. Those closest to homelessness will be prioritized and the minimum amount of assistance needed will be provided.</p> <p>Prioritization will be as followed:</p> <ol style="list-style-type: none"> 1. Individuals who are currently affected by COVID-19 (financially or medically). 2. Groups or populations that have a particularly high risk of homelessness. For example: Households living in areas of the state with a high percentage of unemployment, poverty levels, and/or eviction rate. <p>Data from HMIS will be reviewed weekly to ensure equity and to allow IHCD A to pivot funding to areas showing a higher need of prioritization. This may include an analysis of backgrounds of individuals entering and staying in the system.</p> <p>IHCD A will ensure diverse groups are aware of the intake process and individuals of diverse backgrounds are including in decision making.</p>
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Each region may take these guidelines and fit them into their needs. The CoC BoS CE Committee will adapt the below guidelines as well during this crisis:

- Create leadership group with a variety of stakeholders and backgrounds including those with lived experience who have opportunities to make decisions.
- Leadership should meet weekly and conduct additional case conferencing.
- Leadership should communicate with all individuals or organizations directly involved with CE process and update CE policies and procedures within 10 days when a change is recognized.
- Regions should be mindful of any changes that might disproportionately affect people of color and LGBTQ communities. Black people and people of color also experience disproportionate impacts of COVID-19. These health and housing disparities represent high vulnerabilities that CE assessment and prioritization processes should be actively addressing. Although regions cannot

set prioritization based solely on protected classes, regions can and should prioritize the vulnerabilities created by the compounding effect of other systems' inequities that contribute to people of color experiencing homelessness and impacts of COVID-19 at higher rates. Consider, for instance, housing barriers such as criminal records, poor credit histories, and histories of evictions—all of which disproportionately impact people of color—as vulnerabilities, as these factors often contribute to difficulties accessing and maintaining housing.

Terminating Assistance

Per 24 CFR 576.402, if a program participant violates program requirements, their ESG-CV benefits may be terminated in accordance with a formal process established by the subrecipient that recognizes the rights of the individuals affected and allows for due process. The subrecipient 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. Termination does not bar the subrecipient from providing further assistance at a later date to the same family or individual. To terminate rental assistance or housing relocation and stabilization services, the subrecipient's formal process must include and document at minimum:

- Written notice to the program participant containing a clear statement of the reason(s) for termination;
- A review of the decision, in which the participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
- Prompt written notice of the final decision to the participant.

Agencies should ensure that the Housing First approach is implemented within their homelessness service system, especially with regard to termination of assistance.⁷

Recordkeeping Requirements

Program Guidelines

Per 24 CFR 576 Subpart E, every ESG-CV subrecipient must develop, implement and document program guidelines that include:

- Policies and procedures for evaluating households' eligibility for ESG-CV assistance;
- Targeting and providing essential services related to Street Outreach;
- Policies and procedures for admission, diversion, referral, and discharge by Standard and Temporary Emergency Shelter programs;
- Policies and procedures for assessing, prioritizing, and reassessing households' needs for essential services related to Standard and Temporary Emergency Shelter programs;

⁷ Additional Housing First resources can be found in [Appendix C](#).

- Policies and procedures for coordination among Standard Emergency Shelter providers, Temporary Emergency Shelter providers, essential services providers, Homelessness Prevention, and Rapid Rehousing assistance providers; other homeless assistance providers; and mainstream service and housing providers;
- Policies and procedures for determining and prioritizing which eligible households will receive Homelessness Prevention and which households will receive Rapid Rehousing (policies should include emergency transfer priority required under 24 CFR 576.409);
- Standards for determining the share of rent and utilities costs that each program participant must pay, if any, while receiving Homelessness Prevention or Rapid Rehousing assistance;
- Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time; and
- Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide a program participant, including the limits, if any, on the Homelessness Prevention or Rapid Rehousing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participants receives assistance; or the maximum number of times the program participants may receive assistance.
- Policies and procedures for participation in the subrecipient's CoC coordinated entry system

In addition to these required sections, IHCD will also require all ESG-CV subrecipient's program guidelines to include the following coronavirus-related sections:

- Policies and procedures for preventing the initial or further spread of coronavirus to people experiencing homelessness, people at risk of homelessness, recipient or subrecipient staff, or other shelter or housing residents;
- Policies and procedures for planning to keep people healthy and reduce the risk of exposure to coronavirus and avoid or slow the spread of disease prior to or during a coronavirus outbreak;
- Policies and procedures for responding to coronavirus once it has spread to people experiencing homelessness, provider staff, or once individuals and families lose or are at risk of losing their housing as a result of the economic downturn caused by coronavirus; and
- Policies and procedures for executing ESG-CV funded operations and services remotely (to the furthest extent that is reasonable) and continuing ESG-CV funded operations and services in the event of further shutdowns or restrictions due to coronavirus.

Documenting Homeless Status

Per 24 CFR 576.500(b), the recipient must maintain and follow written intake procedures to ensure compliance with homeless and at-risk of homeless definitions and must include documentation required at intake to verify homeless status in order of HUD preference:

1. Third-party documentation (or written certification of third-party oral verification for those at-risk)
2. Intake worker observation
3. Self-certification from client seeking assistance

Appropriate homeless status documentation for intake files will vary depending on type of assistance provided and the circumstances of each participant. Some documentation is already available, such as discharge paperwork and HMIS service transactions.

Lack of third-party documentation or verification that one's homelessness status is in some part due to the impacts of coronavirus should not prevent a household from being immediately admitted to shelter, receiving Street Outreach services, or from receiving victims' services and shelter. The recordkeeping requirements for each homeless status are detailed as follows:

Literally Homeless

- Written observation by the outreach worker; or
- Written referral by another housing/service provider; or
- Certification by the head of household seeking assistance stating they were living on the streets or in shelter.

Imminent Risk of Homelessness

- A court order resulting from an eviction action notifying the household they must leave; or
- For households leaving a hotel/motel:
 - Evidence that they lack financial resources to stay; or
- A documented and verified oral statement; and
 - Certification that no subsequent residence has been identified; and
 - Self-certification or other written documentation that the household lacks financial resources and support necessary to obtain permanent housing.

At Risk of Homelessness

- Evidence that participant's annual income does not exceed 50 percent (50%) AMI; and
- Self-certification that the household lacks financial resources and support necessary to obtain permanent housing and meets at least one condition of the "at-risk of homeless" definition in 24 CFR 576.2; and
- Source documents to show the program participant does not have sufficient resources or support networks (notice of employment termination, unemployment compensation statement, bank statement); or
 - Written verification by relevant third-party (former employer, relative, etc.); or
 - Written certification by the outreach worker of the oral verification by the third party; or
 - Written statement describing efforts taken to obtain required evidence.

Fleeing/Attempting to Flee Domestic Violence

Oral statement by the head of household seeking assistance which states they are fleeing, have no subsequent residence, and lack other resources. Statement must be documented by a certification of the intake worker or self-certification.

Documenting COVID-19 Impact

Information on how to document COVID-19 tiebacks can be found on the HUD exchange [here](#), and in Appendix C.

Grant Closeout

Once all funds have been expended, the subrecipient is required to close out their grant. The closeout process consists of several components:

- All funds expended
- Final Payment Request submission
- ESG-CV Subrecipient Closeout Workbook
- ESG-CV Final Closeout Form

All complete and final closeout reports must be submitted via email to the ESG-CV Grant Analyst at communityservices@ihcda.in.gov on or before 5:00 p.m. on July 31, 2022. Any funds that are not expended will be recaptured.

PROGRAM ADMINISTRATION

Introduction

This section will discuss the specifics of administering the ESG-CV program. This will include participant's eligibility and eligible activities for each component of ESG-CV. Once again, the ESG-CV program has many different requirements and regulations than the standard ESG program. **While this section does cover these changes, it is highly recommended that each funded organization also reads CPD-21-08 titled "Waivers and Alternative Requirements for the Emergency Solutions Grants (ESG) Program Under the CARES Act"**. This Notice, in some instances, has more detail on new waivers and requirements. All funded organizations will be expected to know the contents of CPD-21-08 in its entirety. Where there are contradictions between the Notice and this Desk Guide, please follow the desk guide or contact IHCDA.

Program Participant Eligibility

Determining Participation

Sub-recipients must conduct an initial evaluation of eligibility in order to determine:

- Each individual or family's eligibility for ESG-CV activities
- The applicant has no appropriate subsequent housing options
- The applicant lacks sufficient resources and support networks to obtain or retain housing
- The applicant has not received any financial assistance from other sources that could result in a duplication of benefits⁸
- The total household income is below 50 percent (50%) AMI (Homelessness Prevention only)
- The minimum amount and types of assistance necessary (Homelessness Prevention and Rapid Rehousing only)

Evaluations must be conducted in accordance with the local coordinated entry process and the agency's program guidelines (24 CFR 576.400), which should follow the Housing First model. Where possible, agencies should attempt to divert households from homelessness, including those seeking shelter who are currently housed but at imminent risk. However, households seeking shelter that are fleeing, or are attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member should not be diverted.

Re-evaluating Participation

In addition to conducting an initial evaluation and connecting program participants to other resources, eligibility for ESG-CV Homelessness Prevention and Rapid Rehousing must be re-evaluated:

- At least once every six months for Homelessness Prevention assistance

⁸ Additional information regarding duplication of benefits is outlined in [Appendix D](#).

- At least once annually for Rapid Rehousing assistance

At a minimum, the re-evaluation must establish that:

- Annual household income is not greater than 50 percent (50%) of the AMI
- The program participant lacks sufficient resources and support networks necessary to retain housing without ESG-CV assistance

Homeless Definitions

Individuals and families seeking assistance must be evaluated to determine their homeless status eligibility for ESG-CV. Each component summarizes the homeless definitions; the complete homeless definitions can be found at [24 CFR 576.2](#).⁹

Income

Individuals and families applying for ESG-CV Homelessness Prevention must have incomes below 50 percent (50%) AMI at initial evaluation. Individuals and families applying for ESG-CV Rapid Rehousing do not need an income assessment at initial evaluation but must have incomes less than or equal to 50 percent (50%) AMI at annual re-evaluation. Income requirements do not apply to program participants who are being served under Standard Emergency Shelter, Temporary Emergency Shelter, or Street Outreach components. When determining the annual income of a household, the subrecipient must refer to the standards for calculating income per 24 CFR 5.609 and the HUD Handbook 4350.3, REV-1, Chapter 5. Current ESG-CV income limits can be found on [HUD's website](#).

Inclusions

- Earned income (wages, salaries, net income from operating of a business or profession)
- Interest and dividend income
- Pension/retirement income
- Unemployment and disability (PUA is excluded from income calculations)
- TANF/public assistance
- Alimony and child support income
- Regular contributions or gifts from organizations or persons not residing in the dwelling
- Armed forces income
- Any other income included in the [HUD's HOME Technical Assistance Handbook- Exhibit 3.1 – 24 CFR Part 5 Annual Income Inclusions](#)¹⁰

Exclusions

- Income of children under 18 (including foster care payments)
- Inheritance and insurance income
- Medical expense reimbursements
- Income of live-in aides

⁹ For ESG-CV, the definitions from 24 CFR 576.2 apply except for the changes made in the definitions section of CPD-21-08.

¹⁰ This resource reference was updated 3/3/2023 to reflect income exclusion criteria in alignment with ESG requirements.

- Certain state payments regarding disability
- Student financial aid
- Armed forces hostile fire pay
- Temporary, non-recurring, or sporadic income
- Certain reparation payments
- Earnings in excess of \$480.00 for each full-time student who is 18 years old or older (excluding the head of household and spouse)
- Adoption assistance payments in excess of \$480.00 per adopted child
- Deferred periodic amounts from SSI or social security benefits that are received in a lump sum amount or in prospective monthly amounts
- Refunds or rebates for property taxes
- Amounts paid by the State to offset the cost to allow a developmentally disabled family member to remain in the home
- **Any additional financial assistance from the CARES Act¹¹**
- Any other exclusions related to 24 CFR 5.609
- Any other exclusions included in the¹² [HUD's HOME Technical Assistance Handbook- Exhibit 3.2 – 24 CFR Part 5 Annual Income Exclusions](#)

Program Components and Eligible Activities

Street Outreach

ESG-CV funds may be used for the costs of providing essential services to unsheltered homeless people (24 CFR 576.101); 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.

Income

Income requirements do not apply to program participants who are being served under the Street Outreach component.

Eligibility

Street Outreach services are provided to persons who meet HUD's Category 1 definition of literally homeless.

Literally Homeless (Category 1)	Individual or family who lacks a fixed, regular, and adequate nighttime residence: <ul style="list-style-type: none"> • Has a primary nighttime residence that is a public or private place not meant for human habitation; including a car, park
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¹¹ This includes any stimulus checks or unemployment benefits related strictly to the CARES Act or in direct response to coronavirus from the federal, state, or local government.

¹² This resource reference was updated 3/3/2023 to reflect income exclusion criteria in alignment with ESG requirements.

	abandoned building, bus or train station, airport, or camping ground.
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Eligible Activities – Essential Services

The following activities are eligible under the Essential Services subcomponent of the Street Outreach component for persons who meet the homeless status eligibility criteria outlined above:

Engagement

Activities designed to locate, identify, and build relationships with unsheltered homeless people for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs, including:

- Initial assessment of needs and program eligibility
- Providing crisis counseling
- Addressing urgent physical needs
- Actively connecting and providing information and referral

Housing-focused Case Management

Assessment of the housing and service needs of unsheltered homeless persons and the arrangement for, coordination of, and monitoring of delivery of services to those persons, including:

- Participation in the centralized or coordinated assessment system of the local CoC
- Initial evaluation, verification and documentation of eligibility
- Counseling
- Developing, securing, and coordinating services
- Helping obtain Federal, State, and local benefits
- Monitoring and evaluating participant progress
- Providing information and referrals to other service providers
- Developing individualized housing and service plans

Emergency Health Services

Direct outpatient treatment of medical conditions by licensed professionals in community-based settings where unsheltered homeless people are living, including:

- Assessing participants’ health problems and developing treatment plans
- Assisting participants in understanding their health needs
- Providing or helping participants obtain appropriate emergency medical treatment
- Providing medication and follow-up services

Emergency Mental Health Services

Direct outpatient treatment of mental health conditions by licensed professionals in community-based settings where unsheltered homeless people are living, including:

- Crisis interventions
- Prescription of psychotropic medications
- Explanation for the use and management of medications

- Combinations of therapeutic approaches to address multiple problems

Transportation Services

Travel by outreach workers, social workers or other service providers during the provision of eligible Street Outreach services¹³, including:

- Transporting unsheltered homeless individuals and families to emergency shelters or other service facilities
- Costs associated with purchasing or leasing a vehicle in which program staff transports program participants and/or staff serving program participants¹⁴
- Cost of a participant's travel on public transit
- Mileage allowance for outreach workers to visit participants
- Cost of staff to accompany or assist participants to use public transportation
- Employee travel to attend CoC meetings or trainings **ARE NOT** eligible expenses

Cellphones and Internet

In CPD-21-08 HUD authorized ESG-CV funds to be used under 24 CFR 576.101(a) to provide temporary cell phones for individuals and families experiencing homelessness, receiving rapid re-housing assistance under the Continuum of Care (CoC) program, and ESG program, receiving homelessness prevention assistance under the ESG program, or residing in permanent supportive housing funded under the CoC program. This can be to the extent to enable them to participate in activities necessary to obtain or maintain housing (e.g., to interview for jobs, to receive health and mental health services, or to continue education). The phone must be owned by the subrecipient, and the service plan must be in the subrecipient's name. The phone and phone service may be loaned to the program participant while stay-at-home or social distancing orders are in effect in the community in which the program participant resides, or while they continue to need it to participate in activities necessary to obtain and maintain housing that remain virtual even after social distancing measures are relaxed. The phone must be returned to the subrecipient when no longer necessary for the previously stated purposes.

Personal Protective Equipment (PPE)

In CPD-21-08 HUD authorized ESG-CV funds to be used under 24 CFR 576.101(a) to purchase equipment used for protection from coronavirus by both Street Outreach service providers and eligible clients, including:

- Face masks or shields
- Hand sanitizer
- Disposable gloves

¹³ Transportation for coronavirus testing and vaccination and for laundry services are both eligible under Street Outreach, but they are both billed under subcomponents from other Street Outreach transportation costs.

¹⁴ The cost of gas, insurance, taxes, and maintenance for the vehicle are also eligible expenses

Services for Special Populations

Any of the essential services listed above that have been tailored to address the special needs of homeless youth, victims of domestic violence and related crimes/threats, and/or people living with HIV/AIDS who are literally homeless.

Eligible Activities – Training

Training specifically on infectious disease prevention and mitigation for ESG-CV funded staff working directly to prevent, prepare for, and respond to coronavirus among persons who are homeless with Street Outreach activities. If the training on infectious disease prevention and mitigation is for staff who are not funded under ESG-CV but are working directly to prevent, prepare for, and respond to coronavirus among persons who are homeless or at risk of homelessness, then it is also eligible under Street Outreach.

Eligible Activities – Hazard Pay¹⁵

Hazard pay for staff working directly to prevent, prepare for, and respond to coronavirus among persons who are homeless with Street Outreach activities. This includes any staff who are putting themselves in proximity to persons with coronavirus or working in locations with a high likelihood of contracting coronavirus for Street Outreach activities. Hazard pay should only be provided to staff for the hours in which they are putting themselves at risk while providing Street Outreach services. This time should be tracked separately on timesheets from time spent providing these same services without putting themselves at risk.

Eligible Activities – Volunteer Incentives

Providing reasonable incentives for volunteers who are currently helping to provide necessary Street Outreach during the coronavirus outbreak. Incentives can be provided for volunteering done in the past by an individual (within the grant period), but only if they are continuing to volunteer after the payment of the incentive. Timesheets or sign-in sheets should be kept for tracking the volunteer's involvement.

Eligible incentives include:

- Cash
- Gift cards
- Meals before, during, or after the time spent volunteering
- Other¹⁶

Eligible Activities – Vaccine Incentives

Making direct, cash payments of up to \$50.00 per dose to Street Outreach-eligible clients as an incentive for receiving a coronavirus vaccine, for a max of \$100.00 in total cash payments per client. For single-dose vaccines, the client can receive one cash payment of \$50.00. For two-dose vaccines, the client can receive two separate cash payments of \$50.00 each. Clients must present an official COVID-19 Record Card as proof that they received the dose. ESG-CV funds may only be used for vaccine incentives to the extent that other vaccine incentives are inaccessible or unavailable to people at-risk of homelessness within the community.

¹⁵ IHCDCA's full hazard pay guidance is outlined in [Appendix G](#).

¹⁶ IHCDCA's full volunteer incentives policy is outlined in [Appendix F](#).

Eligible Activities – Vaccine and Testing Transportation

Transportation costs specifically for the transportation of Street Outreach eligible clients to and from coronavirus testing and vaccination sites is eligible as a separate subcomponent under Street Outreach, including:

- Costs of transporting individuals and families using vehicles owned by the subrecipient to and from coronavirus testing and vaccination sites
- Costs associated with purchasing or leasing a vehicle in which staff transports program participants and/or staff serving program participants¹⁷
- Cost of public transportation for individuals and families to and from coronavirus testing and vaccination sites
- Cost for staff to accompany or assist participants to use public transportation to and from coronavirus testing and vaccination sites

Eligible Activities – Hygiene Services

Installing and maintaining handwashing stations and bathrooms (i.e., portable toilets) in outdoor locations for people experiencing unsheltered homelessness is eligible. Additionally, providing laundry services to prevent the spread of coronavirus among individuals and families experiencing unsheltered homelessness is also eligible. This can include mileage reimbursement for laundry trucks to outdoor locations where people are residing.¹⁸

Record Keeping Requirements

Literally Homeless¹⁹

- Written observation by the outreach worker; or
- Written referral by another housing/service provider; or
- Certification by the head of household seeking assistance stating they were living on the streets or in shelter.

Records to Maintain – Program Participants

Record	Criteria
Homelessness Status and Eligibility Certification	<ul style="list-style-type: none">• Homeless At-Risk Documentation Form
Initial Consultation Documentation	<ul style="list-style-type: none">• Agency Intake Documentation/HMIS Intake
Case Management Documentation	<ul style="list-style-type: none">• Assessing, arranging, coordinating, and monitoring delivery of services to facilitate housing stability• Notes must be dated and detail housing goals, plans, referrals

¹⁷ The cost of gas, insurance, taxes, and maintenance for the vehicle are also eligible expenses

¹⁸ These are distinct from the transportation costs that are eligible under the Essential Services subcomponent of the Street Outreach component.

¹⁹ For Street Outreach, the client's living situation must be a place not meant for human habitation.

Records to Maintain – Administration

Activity	Acceptable Forms of Documentation (both cost incurred and proof of payment are required)	
	Cost Incurred	Proof of Cleared Payment
Bills paid Services performed Materials purchased	<ul style="list-style-type: none"> • Invoice • Receipt 	Canceled checks or bank statement with ESG-CV payments highlighted
Travel costs	<ul style="list-style-type: none"> • Travel request that includes date(s) of travel, from/to, purpose of travel, supporting documentation 	Canceled checks, bank with ESG-CV payments highlighted
Employee Compensation	<ul style="list-style-type: none"> • Timesheets signed by supervisor and employee detailing eligible ESG-CV activities • Pay stub or payroll report from a third party listing pay periods, employee listed, last four digits of SSN 	Copy of pay stub or payroll report from third party Bank statement with ESG-CV payments highlighted

Program Guidelines

Per 24 CFR 576 Subpart E, every ESG-CV subrecipient must develop and implement program guidelines that include:

- Standards should be specific to your organization’s Street Outreach program and adapted to include procedures used for evaluating the eligibility of individuals and families for assistance under the ESG-CV programs as applicable.
- Standards include procedures describing the coordination among Standard Emergency Shelter providers, Temporary Emergency Shelter providers, essential services providers, Homelessness Prevention, and Rapid Rehousing assistance providers, other homeless assistance providers, and mainstream service and housing providers.
- Standards describe the formal termination process established by the agency that recognizes the rights of individuals affected. The subrecipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant’s assistance is terminated only in the most severe cases.
- Standards describe the program participant’s formal grievance process.
- Standards address the policy for participation in HMIS or comparable database.
- Standards include procedures for ensuring that clients served and activities provided with ESG-CV funds are entered into HMIS or comparable database, the timeframe for data to be entered, and the process for ensuring confidentiality of client records.

- Standards include procedures for targeting and providing services related to Street Outreach.

Standard Emergency Shelter

ESG-CV funds may be used for the costs of operating a standard emergency shelter²⁰ and providing essential services to homeless individuals and families in standard emergency shelters (24 CFR 576.102). Standard Emergency Shelter and Temporary Emergency Shelter are considered different component types and must be applied for separately.

Income

Income requirements do not apply to program participants who are being served under the Standard Emergency Shelter component.

Eligibility

Standard Emergency Shelter services are provided to persons who meet HUD’s Category 1, 2, or 4 definitions of homelessness. Additional information regarding HUD’s homeless definition is listed in Appendix C.

<p>Literally Homeless (Category 1)</p>	<p>Individual or family who lacks a fixed, regular, and adequate nighttime residence:</p> <ul style="list-style-type: none"> • Has a primary nighttime residence that is a public or private place not meant for human habitation; • Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, hotels/motels paid for by charitable organizations or federal, state, and local government programs; or • Is exiting an institution where they resided for 120 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.
<p>Imminent Risk of Homelessness (Category 2)</p>	<p>Individual or family who will imminently lose their primary residence, provided that:</p> <ul style="list-style-type: none"> • Residence will be lost within 14 days of the date of application for homeless assistance; • No subsequent residence has been identified; and

²⁰ When the three words in the phrase “Standard Emergency Shelter” are capitalized, the term refers to the ESG-CV component. When not-capitalized, the term refers to the physical structure.

	<ul style="list-style-type: none"> Lacks resources or support networks needed to obtain other permanent housing.
Fleeing/Attempting to Flee Domestic Violence (Category 4)	<p>Individual or family who:</p> <ul style="list-style-type: none"> Is fleeing/attempting to flee domestic violence; Has no other residence; and Lacks resources or support networks needed to obtain other permanent housing.

Eligible Activities – Essential Services

Costs associated with providing essential services to individuals and families, including:

Case Management

Staffing employees that assess, arrange, coordinate, and monitor the delivery of individualized services to meet the needs of the program participant. This can include wages and benefits for time spent providing case management services, including:

- Using the centralized or coordinated assessment system as required under 24 CFR 576.400(d)
- Conducting the initial evaluation required under 24 CFR 576.401(a), including verifying and documenting eligibility
- 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
- Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking
- Developing an individualized housing and service plan, including planning a path to permanent housing stability.

Childcare, Education, Employment, and Life Skills Services

Staffing for the provision of childcare services such as providing meals, snacks, and appropriate developmental activities are eligible. Children must be under the age of 13, unless they are disabled. Disabled children must be under the age of 18. The childcare center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.

Providing program participants with basic knowledge and skills so they can obtain and maintain housing is eligible. This education should be focused on instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, or General Educational Development (GED). These services or activities include:

- Screening, assessment and testing
- Tutoring
- Counseling
- Individual or group instruction
- Books and instructional material
- Referral to community resources

Providing employment assistance and job training for program participants is eligible. This can be through classroom, online, computer instruction, and/or on-the-job training. This employment assistance and job training should assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. These services or activities include:

- Acquisition of vocational licenses and/or certificates
- Employment screening, assessment, and testing
- Special training and tutoring, including literacy training and prevocational training
- Books and instructional material
- Counseling or job coaching
- Referral to community resources

Teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance use, and homelessness is eligible. These must be skills that are necessary to assist the program participant to function independently in the community, including:

- Budgeting resources
- Managing a household
- Shopping for food and needed items
- Using public transportation
- Managing money
- Resolving conflict
- Improving nutrition
- Parenting

Legal Services

Legal services are limited to those services necessary to help program participants obtain housing or keep a program participant from losing housing where they currently reside. Immigration and citizenship matters and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements are ineligible costs.

Health, Mental Health, and Substance Abuse Services

Direct outpatient treatment of medical conditions provided by licensed medical professionals (to the extent that other appropriate health services are unavailable within the community) are eligible, including:

- 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 emergency medical services
- Medication and follow-up services
- Preventive and non-cosmetic dental care

Direct outpatient treatment of mental health conditions provided by licensed medical professionals (to the extent that other appropriate health services are unavailable within the community) are eligible, including:

- Application of therapeutic processes to personal, family, situational, or occupational problems
- Crisis interventions
- Individual, family, or group therapy sessions
- Prescription of psychotropic medications

- Explanations about the use and management of medications

Substance abuse treatment services designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors that are provided by licensed or certified professionals (to the extent that other appropriate health services are unavailable within the community) are eligible, including:

- Client intake and assessment
- Outpatient treatment for up to 30 days
- Group and individual counseling and drug testing
- Inpatient detoxification and other inpatient drug or alcohol treatment ARE NOT eligible costs

Personal Protective Equipment (PPE)

In CPD-21-08, HUD authorized ESG-CV funds to be used under 24 CFR 576.102(a)(1) to purchase equipment used for protection from coronavirus by both Standard Emergency Shelter service providers and eligible clients, including:

- Face masks or shields
- Hand sanitizer
- Disposable gloves

Transportation

Transportation costs of a program participant's travel to and from medical care, employment, childcare, or other eligible essential services facilities are eligible²¹, including:

- Public transportation for program participants to and from emergency shelters or other service facilities
- Travel costs for service workers to accompany or assist program participants to use public transportation to and from emergency shelters or other service facilities
- Travel costs for service workers to visit program participants using their own vehicle²²
- Costs associated with purchasing or leasing a vehicle in which staff transports program participants and/or staff serving program participants²³

Services for Special Populations

Any of the essential services listed above that have been tailored to address the special needs of homeless youth, victims of domestic violence and related crimes/threats, and/or people living with HIV/AIDS who are literally homeless.

Eligible Activities – Operations

Expenses to operate and maintain standard emergency shelters, including:

²¹ Transportation for coronavirus testing and vaccination is eligible under Standard Emergency Shelter but is billed under a separate subcomponent than other Standard Emergency Shelter transportation costs.

²² Travel costs can be reimbursed using the Federal mileage rate.

²³ The cost of gas, insurance, taxes, and maintenance for the vehicle are also eligible expenses

Minor or Routine Maintenance

Repairing appliances or portions of the structure that are in disrepair within the standard emergency shelter is eligible. Replacing appliances or portions of the structure within the standard emergency shelter is eligible if the existing appliances or portions of the structure are unsafe, unusable, and/or more expensive to continue using than to replace. If the subrecipient is replacing appliances or portions of the structure, they must have both written and photographic documentation on how it was unsafe, unusable, and/or more expensive to continue using than to replace. If the replacement or upgrade requires outside contracting, the outside contractor should be the one to provide the written documentation. Eligible costs include:

- Staffing or contracting of qualified persons for repairs
- Installation, appliances, and supplies for replacements
- Installation, appliances, and supplies for non-replacement purposes²⁴ ARE NOT considered minor or routine maintenance
- Renovation, major rehab, and conversion ARE NOT eligible

Rent

The rent for the facility being used as a standard emergency shelter is eligible. If only a portion of the facility is being used as a standard emergency shelter, then only the rent for that portion of the facility is eligible for reimbursement under the Standard Emergency Shelter component. Rent for administrative office spaces within the same facility are not eligible under the Standard Emergency Shelter component if they are not used solely for the administration of the standard emergency shelter. The portion of rent that is allowable is proportionate to the percentage of the facility's total square footage that is being used as a standard emergency shelter. The calculation of the portion of the rent being billed under Standard Emergency Shelter should be documented in a written memo.

Security

The purchase, installation, and maintaining of security-related items are eligible, including:

- Security cameras
- Security system software and subscriptions
- Locks for windows or doors
- Light fixtures and flashlights

Fuel

Fuel for the operation of machines and appliances necessary for the maintaining and operation of the standard emergency shelter, including:

- Lawn mowers
- Leaf blowers
- Power washers
- Non-street legal vehicles

²⁴ Non-replacement purposes means the introduction of appliances or portions of the structure that were not present in the standard emergency shelter beforehand (e.g., constructing a new wall, installing a dishwasher when there was not one in the facility already, etc.).

- Gas for street legal vehicles IS NOT eligible²⁵

Insurance

The insurance for the facility being used as a standard emergency shelter is eligible. If only a portion of the facility is being used as a standard emergency shelter, then only the insurance for that portion of the facility is eligible for reimbursement under the Standard Emergency Shelter component. Insurance for administrative office spaces within the same facility are not eligible under the Standard Emergency Shelter component if they are not used solely for the administration of the standard emergency shelter. The portion of insurance that is allowable is proportionate to the percentage of the facility's total square footage that is being used as a standard emergency shelter. The calculation of the portion of the insurance being billed under Standard Emergency Shelter should be documented in a written memo.

Utilities

The utilities for the facility being used as a standard emergency shelter are eligible. If only a portion of the facility is being used as a standard emergency shelter, then only the utilities for that portion of the facility are eligible for reimbursement under the Standard Emergency Shelter component. Utilities for administrative office spaces within the same facility are not eligible under the Standard Emergency Shelter component if they are not used solely for the administration of the standard emergency shelter. The portion of utilities that are allowable is proportionate to the percentage of the facility's total square footage that is being used as a standard emergency shelter. The calculation of the portion of the utilities being billed under Standard Emergency Shelter should be documented in a written memo. Eligible utilities include:

- Electricity
- Sewage
- Phone
- Gas
- Trash
- Lawn service
- Water
- Internet
- Pest control

Food for Shelter Residents

The purchase of food and supplies for food storage, preparation, and serving are eligible. This can only be for food that is being served to Standard Emergency Shelter-eligible clients within a standard emergency shelter.

Furniture and Furnishings

Furniture and furnishings necessary for the operation of a standard emergency shelter are eligible. This can only be for furniture and furnishings that are used exclusively within the standard emergency shelter and for Standard Emergency Shelter services.

Equipment

Equipment necessary for the operation of a standard emergency shelter are eligible. This can only be for equipment that is used exclusively for Standard Emergency Shelter services.

²⁵ Use of street legal vehicles can be reimbursed as transportation costs with the Federal mileage rate under Essential Services.

Supplies

Supplies necessary for the operation of a standard emergency shelter are eligible. This can only be for supplies that are used exclusively for Standard Emergency Shelter services.

Hotel or Motel Vouchers

When no appropriate standard emergency shelter is available, the subrecipient may pay for a hotel or motel room directly or through a hotel or motel voucher. Additionally, funds can be used to pay for cleaning of hotel and motel rooms used by program participants as well as to repair damages caused by program participants above normal wear and tear of the room. Essential Services that are eligible under the Standard Emergency Shelter component can be provided to program participants staying in hotels and motels that are being funded under the Standard Emergency Shelter component.

Eligible Activities – Disease Mitigation Training

Training specifically on infectious disease prevention and mitigation for ESG-CV funded staff working directly to prevent, prepare for, and respond to coronavirus among persons who are homeless with Standard Emergency Shelter activities.

Eligible Activities – Hazard Pay²⁶

Hazard pay for staff working directly to prevent, prepare for, and respond to coronavirus among persons who are homeless with Standard Emergency Shelter activities. This includes any staff who are putting themselves in proximity to persons with coronavirus or working in locations with a high likelihood of contracting coronavirus for Standard Emergency Shelter activities. Hazard pay should only be provided to staff for the hours in which they are putting themselves at risk while providing Standard Emergency Shelter services. This time should be tracked separately on timesheets from time spent providing these same services without putting themselves at risk.

Eligible Activities – Volunteer Incentives

Providing reasonable incentives for volunteers who are currently helping to provide necessary Standard Emergency Shelter services during the coronavirus outbreak. Incentives can be provided for volunteering done in the past by an individual (within the grant period), but only if they are continuing to volunteer after the payment of the incentive. Timesheets or sign-in sheets should be kept for tracking the volunteer's involvement. Eligible incentives include:

- Cash
- Gift Cards
- Meals before, during, or after time spent volunteering
- Other²⁷

Eligible Activities – Vaccine Incentives

Making direct, cash payments of up to \$50.00 per dose to Standard Emergency Shelter-eligible clients as an incentive for receiving a coronavirus vaccine, for a max of \$100.00 in total cash payments per client. For single-dose vaccines, the client can receive one cash payment of \$50.00. For two-dose vaccines, the client can receive two separate cash payments of \$50.00 each. Clients must present an official COVID-19

²⁶ IHCD's full hazard pay guidance is outlined in [Appendix G](#).

²⁷ IHCD's full volunteer incentives policy is outlined in [Appendix F](#).

Record Card as proof that they received the dose. ESG-CV funds may only be used for vaccine incentives to the extent that other vaccine incentives are inaccessible or unavailable to people at-risk of homelessness within the community.

Eligible Activities – Vaccine and Testing Transportation

Transportation costs specifically for the transportation of Standard Emergency Shelter eligible clients to and from coronavirus testing and vaccination sites is eligible as a separate subcomponent under Standard Emergency Shelter, including:

- Costs of transporting individuals and families using vehicles owned by the subrecipient to and from coronavirus testing and vaccination sites²⁸
- Costs associated with purchasing or leasing a vehicle in which staff transports program participants and/or staff serving program participants²⁹
- Cost of public transportation for individuals and families to and from coronavirus testing and vaccination sites
- Cost for staff to accompany or assist participants to use public transportation to and from coronavirus testing and vaccination sites

Habitability Standards

All standard emergency shelters funded with ESG-CV must meet and document basic habitability standards as detailed in 24 CFR 576.403.

Minimum Shelter Standards

Per 24 CFR 576.403(b), standard emergency shelters must meet and document minimum safety, sanitation, and privacy standards related to the following topics:

- Structure and materials
- Space and security
- Water supply
- Thermal environment
- Sanitary Conditions
- Illumination and electricity
- Access
- Interior air quality
- Sanitary facilities
- Food Preparation
- Fire Safety

Records to Maintain – Program Participants

Record	Criteria
Homelessness Status and Eligibility Certification	<ul style="list-style-type: none"> • Homeless At-Risk Documentation Form
Initial Consultation Documentation	<ul style="list-style-type: none"> • Agency Intake Documentation/HMIS Intake
Case Management Documentation	<ul style="list-style-type: none"> • Assessing, arranging, coordinating, and monitoring delivery of services to facilitate housing stability • Notes must be dated and detail housing goals, plans, referrals
Habitability Inspection	<ul style="list-style-type: none"> • Housing Habitability Standards

²⁸ This can be reimbursed using the Federal mileage rate.

²⁹ The cost of gas, insurance, taxes, and maintenance of the vehicle are also eligible expenses.

Lead-based Paint Inspection	<ul style="list-style-type: none"> • Lead-Based Paint Exemption³⁰ • Lead-Based Paint Disclosure • Lead-based Paint Maintenance Agreement
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Records to Maintain – Administration

Activity	Acceptable Forms of Documentation (both cost incurred and proof of payment are required)	
	Cost Incurred	Proof of Cleared Payment
Bills paid Services performed Materials purchased	<ul style="list-style-type: none"> • Invoice • Receipt 	Canceled checks or bank statement with ESG-CV payments highlighted
Travel costs	<ul style="list-style-type: none"> • Travel request that includes date(s) of travel, from/to, purpose of travel, supporting documentation 	Canceled checks, bank with ESG-CV payments highlighted
Employee Compensation	<ul style="list-style-type: none"> • Timesheets signed by supervisor and employee detailing eligible ESG-CV activities • Pay stub or payroll report from a third party listing pay periods, employee listed, last four digits of SSN 	Copy of pay stub or payroll report from third party Bank statement with ESG-CV payments highlighted

Compliance Process

Standard emergency shelters funded with ESG-CV must meet basic habitability standards as detailed in 24 CFR 576.403(b). Standard emergency shelters will be inspected during site visits to ensure compliance with the minimum habitability standards. The Compliance Reviewer will inspect the building exterior, building systems, parking lots/driveways, playground, lawn, a random selection of sleeping rooms, and any common areas on the property. The Compliance Reviewer will note any deficiencies found in the post monitoring letter and the subrecipient will need to provide documentation and/or photographs indicating that the issues have been corrected. Sub-recipients are responsible for notifying clients prior to the site visit that an IHCD staff member will be on site for an inspection of the shelter.

Program Guidelines

Per 24 CFR 576 Subpart E, every ESG-CV subrecipient must develop and implement program guidelines that include:

- Policy for admission, diversion, referral, and discharge by standard emergency shelters assisted under ESG-CV, including standards regarding length of stay limits, if any, and safeguards to meet the safety and shelter needs of victims of domestic violence, sexual assault, etc.

³⁰ Updated 3/9/2023 in compliance with ESG requirements

- Policy for admission, diversion, referral, and discharge by standard emergency shelters including standards regarding length of stay limits, if any, and safeguards to meet the safety and shelter needs of individuals and families who have the highest barriers to housing and are likely to be homeless the longest.
- Procedure for assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to Standard Emergency Shelter.

Homelessness Prevention

To prevent households from becoming literally homeless (24 CFR 576.103).

Eligibility

Participants must meet the definition of at-risk of homelessness³¹ and have an annual income below 50 percent (50%) of area median income (AMI), as determined by HUD, at initial evaluation, and all subsequent re-evaluations.

Eligible Activities – Housing Relocation and Stabilization Services

Costs associated with providing housing relocation and stabilization services to individuals and families, including:

Housing Search and Placement Services

Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing are eligible, including:

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

Housing Stability Case Management

Assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing are eligible. This assistance cannot exceed 60 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing. Component services and activities consist of:

³¹ More information on HUD's "At Risk of Homelessness" categories can be found in [Appendix C](#).

- Using the centralized or coordinated assessment system as required under 24 CFR 576.400(d) to evaluate individuals and families applying for or receiving Homelessness Prevention
- Conducting the initial evaluation required under 24 CFR 576.401(a), including verifying and documenting eligibility, for individuals and families applying for Homelessness Prevention
- 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 required under 24 CFR 576.401(b)
- Conducting the initial evaluation required under 24 CFR 576.401(a), including verifying and documenting eligibility
- Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking
- Developing an individualized housing and service plan, including planning a path to permanent housing stability

Mediation

Paying 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, is eligible.

Legal Services

Legal services are limited to those services necessary to help program participants obtain housing or keep a program participant from losing housing where they currently reside. Immigration and citizenship matters and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements are ineligible costs.

Credit Repair

Paying for credit counseling and other services necessary to assist program participants with critical financial skills are eligible, including skills related to:

- Household budgeting
- Managing money
- Accessing a free personal credit report
- Resolving personal credit problems

This assistance DOES NOT include the payment or modification of a debt.

Personal Protective Equipment (PPE)

In CPD-21-08 HUD authorized ESG-CV funds to be used under 24 CFR 576.102(a)(1) to purchase equipment used for protection from coronavirus by both Homelessness Prevention service providers and eligible clients, including:

- Face masks or shields
- Hand sanitizer
- Disposable gloves

Furniture and Household Furnishings

Buying furniture and household furnishings for use by program participants while they are receiving Homelessness Prevention assistance is eligible. These furnishings and furniture are subject to the requirements for equipment at 24 CFR 200.313. Upon the termination of Homelessness Prevention assistance, the program participant must return all furniture and household furnishings that were reimbursed with ESG-CV funding to the subrecipient. These furnishings and furniture may be reused by the subrecipient for multiple households, as long as those households are receiving Homelessness Prevention assistance.

Renters' Insurance

Paying for renters' insurance for program participants receiving Homelessness Prevention assistance is eligible. In order to pay for renters' insurance for program participants, the subrecipient must:

1. Demonstrate that the payment of renters' insurance is necessary to obtain or maintain housing (e.g., the landlord requires renters to have renters' insurance to reside in the unit in the lease); and
2. Pay the renters' insurance directly to the insurance company on behalf of the program participant

Childcare, Education, Employment, and Life Skills Services³²

Staffing for the provision of childcare services such as providing meals, snacks, and appropriate developmental activities are eligible. The children must be under the age of 13, unless they are disabled. Disabled children must be under the age of 18. The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.

Providing program participants with basic knowledge and skills so they can obtain and maintain housing is eligible. This education should be focused on instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, or General Educational Development (GED). These services or activities include:

- Screening, assessment and testing
- Individual or group instruction
- Tutoring
- Books and instructional material

³² Originally eligible only under Essential Services for Standard and Temporary Emergency Shelter, CPD-21-08 has made all Essential Services under 24 CFR 576.102(a)(1) also eligible under the Housing Relocation and Stabilization Services subcomponent of the Homelessness Prevention component for ESG-CV.

- Counseling
- Referral to community resources

Providing employment assistance and job training for program participants is eligible. This can be through classroom, online, computer instruction, and/or on-the-job training. This employment assistance and job training should assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. These services or activities include:

- Acquisition of vocational licenses and/or certificates
- Employment screening, assessment, and testing
- Special training and tutoring, including literacy training and prevocational training
- Books and instructional material
- Counseling or job coaching
- Referral to community resources

Teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance use, and being at-risk of homelessness is eligible. These must be skills that are necessary to assist the program participant to function independently in the community, including:

- Budgeting resources
- Managing a household
- Shopping for food and needed items
- Using public transportation
- Managing money
- Resolving conflict
- Improving nutrition
- Parenting

Health, Mental Health, and Substance Abuse Services³³

Direct outpatient treatment of medical conditions provided by licensed medical professionals (to the extent that other appropriate health services are unavailable within the community) are eligible, including:

- 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 emergency medical services
- Medication and follow-up services
- Preventive and non-cosmetic dental care

Direct outpatient treatment of mental health conditions provided by licensed medical professionals (to the extent that other appropriate health services are unavailable within the community) are eligible, including:

- Application of therapeutic processes to personal, family, situational, or occupational problems
- Crisis interventions
- Individual, family, or group therapy sessions

³³ Originally eligible only under Essential Services for Standard and Temporary Emergency Shelter, CPD-21-08 has made all Essential Services under 24 CFR 576.102(a)(1) also eligible under the Housing Relocation and Stabilization Services subcomponent of the Homelessness Prevention component for ESG-CV.

- Prescription of psychotropic medications
- Explanations about the use and management of medications

Substance abuse treatment services designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors that are provided by licensed or certified professionals (to the extent that other appropriate health services are unavailable within the community) are eligible, including:

- Client intake and assessment
- Outpatient treatment for up to 30 days
- Group and individual counseling and drug testing
- Inpatient detoxification and other inpatient drug or alcohol treatment ARE NOT eligible costs.

Transportation

Transportation costs of a program participant's travel to and from medical care, employment, childcare, or other eligible essential services facilities are eligible³⁴, including:

- Public transportation for program participants to and from permanent housing and service facilities
- Travel costs for service workers to accompany or assist program participants to use public transportation to and from permanent housing and service facilities
- Travel costs for service workers to visit program participants using their own vehicle³⁵
- Costs associated with purchasing or leasing a vehicle in which staff transports program participants and/or staff serving program participants³⁶

Services for Special Populations

Any of the essential services listed above that have been tailored to address the special needs of youth, victims of domestic violence and related crimes/threats, and/or people living with HIV/AIDS who are at-risk of homelessness.

Eligible Activities – Financial Assistance

Direct financial payments to housing owners, utility companies, and other third parties for a tenant are eligible, including:

Moving Costs

Paying for moving costs, such as truck rental or hiring a moving company are eligible. 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 Housing Relocation and Stabilization Services under Homelessness Prevention and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears IS NOT eligible.

³⁴ Transportation for coronavirus testing and vaccination is eligible under Homelessness Prevention but is billed under a separate subcomponent than other Homelessness Prevention transportation costs.

³⁵ Travel costs can be reimbursed using the Federal mileage rate.

³⁶ The cost of gas, insurance, taxes, and maintenance for the vehicle are also eligible expenses

Rent Application Fees

Paying for the rental housing application fee that is charged by the owner to all applicants is eligible. If the household has multiple members who are required to pay a fee, each rental application fee charged to the household can be reimbursed.

Last Month’s Rent

If necessary to obtain housing for a program participant, paying the last month's rent to the owner of that housing at the time the owner is paid the security deposit and the first month's rent is eligible. This assistance must not exceed one month's rent.

Security and Utility Deposits

Paying for a standard security deposit required by the landlord for all customers is eligible. Paying for a standard utility deposit required by the utility company for all customers for the following utilities is also eligible:

- Gas
- Water
- Electric
- Sewage

Utility Payments

Paying for up to 24 months of utility payments per program participant, per service is eligible. 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 include:

- Gas
- Water
- Electric
- Sewage

Utility Arrears

Paying up to six months of arrears, including late fees on the arrears, of utility payments per program participant, per service is eligible. 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 include:

- Gas
- Water
- Electric
- Sewage

Eligible Activities – Rental Assistance

Direct rental payments to housing owners, landlords, and other third parties for a tenant are eligible. **Rental assistance may not be provided to a program participant who is currently receiving rental assistance under another program.** Eligible costs include the following:

Short-Term Rental Assistance

Providing up to three months of rental assistance. Short-term 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.

Medium-Term Rental Assistance

Providing between 3 and 24 months of rental assistance. Medium-term 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.

Continuation of Assistance

Due to shifting HUD guidelines in the maximum amount of medium-term rental assistance allowable under ESG-CV (now 24 months, previously 12 months), clients who have recently completed their assistance but have not been exited from the program may still be recertified for additional assistance.³⁷ In this case, “recent” means the client has received ESG-CV rental assistance within the last 60 days. This will be treated as a continuation of assistance. Clients must still be reassessed for continued eligibility at every 6-month mark. Late fees assessed during the interim between periods of assistance cannot be paid for out of program funds.

Rental Arrears

One-time payment of up to six months rental arrears, including late fees on the arrears.

Eligible Activities – Disease Mitigation Training

Training specifically on infectious disease prevention and mitigation for ESG-CV funded staff working directly to prevent, prepare for, and respond to coronavirus among persons who are at risk of homelessness with Homelessness Prevention activities.

Eligible Activities – Hazard Pay³⁸

Hazard pay for staff working directly to prevent, prepare for, and respond to coronavirus among persons who are at-risk of homelessness with Homelessness Prevention activities. This includes any staff who are putting themselves in proximity to persons with coronavirus or working in locations with a high likelihood of contracting coronavirus for Homelessness Prevention activities. Hazard pay should only be provided to staff for the hours in which they are putting themselves at risk while providing Homelessness Prevention services. This time should be tracked separately on timesheets from time spent providing these same services without putting themselves at risk.

Eligible Activities – Volunteer Incentives

Providing reasonable incentives for volunteers who are currently helping to provide necessary Homelessness Prevention during the coronavirus outbreak. Incentives can be provided for volunteering done in the past by an individual (within the grant period), but only if they are continuing to volunteer after the payment of the incentive. Timesheets or sign-in sheets should be kept for tracking the volunteer’s involvement. Eligible incentives include:

- Cash
- Gift cards
- Meals before, during, or after the time spent volunteering

³⁷ See additional information in the FAQs found in [Appendix H](#).

³⁸ IHCD’s full hazard pay guidance is outlined in [Appendix G](#).

- Other³⁹

Eligible Activities – Landlord Incentives

Providing reasonable and necessary incentives for landlords to obtain housing for individuals and families at risk of homelessness is eligible. **However, a recipient may not use ESG-CV funds to pay the landlord incentives in an amount that exceeds three times the rent charged for the unit.** These incentives must be agreed upon between the subrecipient and the landlord prior to the program participant being housed and included in the rental assistance agreement to be eligible under ESG-CV. These incentives include:

- Signing bonuses equal to up to two months of rent
- Security deposits equaling up to three months of rent⁴⁰
- Repair costs for damages incurred by the program participant not covered by the security deposit or that are incurred while the program participant is still residing in the unit
- Cleaning and maintenance costs for the unit or appliances

Eligible Activities – Vaccine Incentives

Making direct, cash payments of up to \$50.00 per dose to Homelessness Prevention-eligible clients as an incentive for receiving a coronavirus vaccine, for a max of \$100.00 in total cash payments per client. For single-dose vaccines, the client can receive one cash payment of \$50.00. For two-dose vaccines, the client can receive two separate cash payments of \$50.00 each. Clients must present an official COVID-19 Record Card as proof that they received the dose. ESG-CV funds may only be used for vaccine incentives to the extent that other vaccine incentives are inaccessible or unavailable to people at-risk of homelessness within the community.

Eligible Activities – Vaccine and Testing Transportation

Transportation costs specifically for the transportation of Homeless Prevention eligible clients to and from coronavirus testing and vaccination sites is eligible as a separate subcomponent under Homeless Prevention, including:

- Costs of transporting individuals and families using vehicles owned by the subrecipient to and from coronavirus testing and vaccination sites⁴¹
- Cost of public transportation for individuals and families to and from coronavirus testing and vaccination sites
- Cost for staff to accompany or assist participants to use public transportation to and from coronavirus testing and vaccination sites
- Costs associated with purchasing or leasing a vehicle in which staff transports program participants and/or staff serving program participants⁴²

³⁹ IHCD's full volunteer incentives policy is outlined in [Appendix F](#).

⁴⁰ These are separate from the costs of security deposits under the Financial Assistance subcomponent of Homelessness Prevention.

⁴¹ This can be reimbursed using the Federal mileage rate.

⁴² The cost of gas, insurance, taxes, and maintenance for the vehicle are also eligible expenses

Forms of Rental Assistance

Rental Assistance can come in one of three forms. For each form, recertification of program participants is required **at least every six months**.

Tenant-based Rental Assistance

A program participant may select a housing unit in which to live and may move to another unit or building and continue to receive rental assistance, as long as the program participant continues to meet the program requirements. The recipient may require that all program participants live within a particular area for the period in which the rental assistance is provided. There must be a lease between the owner and the program participant. Prior to assistance, the subrecipient and the owner must complete a rental assistance agreement. The rental assistance agreement must terminate and no further rental assistance payments under that agreement may be made if:

1. The program participant moves out of the housing unit for which the program participant has a lease; or
2. The lease terminates and is not renewed; or
3. The program participant becomes ineligible to receive ESG-CV rental assistance under Homelessness Prevention.

Project-based Rental Assistance

The subrecipient may enter into a rental assistance agreement with the owner of an ESG-CV eligible permanent housing unit to reserve the unit and subsidize its rent prior to a program participant moving into the unit. The rental assistance agreement may cover one or more permanent housing units in the same building. Each unit covered by the rental assistance agreement may only be occupied by ESG-CV eligible program participants. The following rules apply to all project-based rental assistance:

- The subrecipient may pay up to 100 percent (100%) of the first month's rent, provided that a program participant signs a lease with the owner and moves into the unit before the end of the month for which the first month's rent is paid.
- The rent paid before a program participant moves into the unit must not exceed the rent to be charged under the program participant's lease and must be included when determining that program participant's total rental assistance.
- The subrecipient may make monthly rental assistance payments only for each whole or partial month an assisted unit is leased to a program participant, except that if a program participant moves out of an assisted unit before expiration of the agreement.
- The subrecipient may use ESG-CV funds to cover up to 100 percent (100%) of the rent for the unit for up to 30 days from the end of the month in which the unit was vacated while the subrecipient attempts to house another eligible program participant in that unit.
- The previously listed payment will not count toward the total rental assistance provided to the next program participant housed in the unit, unless the program participant moves in during the first half of the month that is paid using this flexibility.

- This payment will not prevent paying up to 100 percent (100%) of the first month's rent for the new program participant as long as the payments are made for different months.

The program participant's lease must not condition the term of occupancy to the provision of rental assistance payments. If the program participant is determined ineligible or reaches the maximum number of months over which rental assistance can be provided, the subrecipient must suspend or terminate the rental assistance payments for the unit. If the payments are suspended, the individual or family may remain in the assisted unit as permitted under the lease, and the subrecipient may resume payments if the individual or family again becomes eligible and needs further rental assistance. If the payments are terminated, the rental assistance may be transferred to another available unit in the same building, provided that the other unit meets all ESG-CV requirements.

The rental assistance agreement between the subrecipient and the owner must have an initial term of no less than one year. When a new program participant moves into an assisted unit, the term of the rental assistance agreement may be extended to cover the initial term of the program participant's lease. If the program participant's lease is renewed, the rental assistance agreement may be renewed or extended, as needed, up to the maximum number of months for which the program participant remains eligible.

Sponsor-based Rental Assistance

The subrecipient must execute a sponsor-based rental assistance agreement with a separate government agency, instrumentality, or nonprofit organization (“sponsor”) to subsidize the rent of program participants who are referred to be housed in units owned or leased by the sponsor. The rental assistance agreement may cover one or more permanent housing units owned or leased by the sponsor. Each unit covered by the rental assistance agreement may only be occupied by program participants. The following rules apply to all sponsor-based rental assistance:

- The subrecipient may pay up to 100 percent (100%) of the rent for the first month that the sponsored unit becomes available for rent to a new program participant, provided that a program participant signs a lease or sublease and moves into the unit before the end of the month for which that first month's rent is paid.
- The rent paid before a program participant moves into the unit must not exceed the rent to be charged under the new program participant's lease or sublease, and unless the program participant moves in during the last half of the month that is paid, this payment must be included when determining that program participant's total rental assistance.
- The previously listed payment be at the beginning of the agreement or after the payment permitted in the following paragraph, as long as payments are made for different months.
- The subrecipient may make monthly rental assistance payments only for each whole or partial month a sponsored unit is leased or subleased to a program participant, except that if a program participant moves out of a sponsored unit before expiration of the rental assistance agreement.
- The subrecipient may use ESG-CV funds to cover up to 100 percent (100%) of the rent for the unit for up to 30 days from the end of the month in which the unit was vacated while the

subrecipient work together with the sponsor to house another eligible program participant in that unit.

- The previously listed payment will not count toward the total rental assistance provided to the next program participant housed in the unit, unless the program participant moves in during the first half of the month that is paid using this flexibility.
- The subrecipient may require that the program participant rent a unit owned by the sponsor to benefit from sponsor-based rental assistance. However, in no case may a subrecipient execute a sponsor-based rental assistance agreement with itself or its parent or subsidiary organization.

In all other respects, sponsor-based rental assistance must be administered in accordance with the same requirements that apply to tenant-based and project-based rental assistance under 24 CFR 576, the waivers and alternative requirements in CPD-21-08, and the ESG-CV Desk Guide; except that:

- The references to “owner” and “housing owner” will be understood to refer to the “sponsor,” when those terms appear in the 24 CFR 576.105, 24 CFR 576.106, 24 CFR 576.409, and 24 CFR 576.500(h);
- The references to “lease” will be understood to refer to the lease or sublease (as applicable) between the program participant and the sponsor for the “sponsored unit” in which the program participant will reside when those terms appear in 24 CFR 576.105, 24 CFR 576.106, 24 CFR 576.409, and 24 CFR 576.500(h); and
- The references to “project-based rental assistance” will be understood to refer to “sponsor-based rental assistance” when that term appears in 24 CFR 576.409.

Leases, Subleases, and Rental Assistance Agreements

Within this ESG-CV Desk Guide, CPD-21-08, and 24 CFR 576 “lease” refers to a legally binding, written lease for the rental unit. This must be between the owner and the program participant. Where the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease, if the agreement gives the program participant an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented by the owner's financial records, rent ledgers, or canceled checks. For program participants living in housing with project-based rental assistance, the lease must have an initial term of no less than one year. Each lease executed on or after December 16, 2016 must include a lease provision or incorporate a lease addendum that includes all requirements that apply to tenants, the owner or lease under 24 CFR 5 Subpart L (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), as supplemented by 24 CFR 576.409, including the prohibited bases for eviction and restrictions on construing lease terms under 24 CFR 5.2005(b) and (c). If the housing is not assisted under another “covered housing program” as defined in 24 CFR 5.2003, then the lease provision or lease addendum may be written to expire at the end of the rental assistance period.

In CPD-21-08 HUD authorized ESG-CV funds to be used under 24 CFR 576.105 and 24 CFR 576.106 for program participants who are subleasing. Within this ESG-CV Desk Guide, CPD-21-08, and 24 CFR 576, “sublease” refers to a legally valid sublease with the primary leaseholder for the rental unit. When a program participant chooses to sublease a unit:

- The references to “owner” and “housing owner” will be understood to refer to the “primary leaseholder” when those terms appear in the ESG-CV Desk Guide, CPD-21-08, 24 CFR 576.105, 24 CFR 576.106, 24 CFR 576.409, and 24 CFR 576.500(h); and
- The references to “lease” will be understood to refer to the sublease, when that term appears in the ESG-CV Desk Guide, CPD-21-08, 24 CFR 576.105, 24 CFR 576.106, 24 CFR 576.409, and 24 CFR 576.500(h).

Within this ESG-CV Desk Guide, CPD-21-08, and 24 CFR 576 “rental assistance agreement” refers to a documented agreement between the subrecipient providing rental assistance and the owner of the unit. This agreement establishes the terms under which rental assistance will be provided. It also requires the owner to provide a copy of any notice provided to program participants to vacate the housing unit or any complaint used under State or local law to evict the program participant to the agency providing ESG-CV rental assistance. This is not a legally binding agreement and is not the same as a lease or sublease.

Housing Stability Case Management

While providing Homelessness Prevention, the case manager must develop a plan to assist the program participant to retain permanent housing after the ESG-CV assistance ends, taking into account all relevant considerations such as the participant’s current or expected income and expenses; other public or private assistance for which the participant will be eligible and likely to receive; and the relative affordability of available housing in the area. Assistance cannot exceed 60 days during the period the program participant is seeking permanent housing.

Using Rental Assistance with Other Subsidies

Rental assistance cannot be provided to program participants receiving tenant-based rental assistance or living in a housing unit receiving project-based rental assistance or operating assistance through other public sources for the same time period. Rental arrears can be provided to households receiving rental subsidies.

Rent Restrictions

Rental units must comply with rent reasonableness standards (24 CFR 982.507). FMR (Fair Market Rent) standards in place for regular ESG funds have been waived for ESG-CV. **For ESG-CV funding, IHEDA has determined that the Rent Reasonableness Standard will be the total of the GoSection8 calculation plus \$200.** Rent for units assisted with ESG-CV funding must not exceed the sum total of the rent reasonableness standard + \$200. Rent must be reasonable when compared to other units of similar location, type, size, and amenities within the community. Requirements do not apply for households not receiving ESG-CV rental assistance. Rent reasonableness is determined using the GoSection8 website calculation. Compliance with this requirement should be documented with the GoSection8 website printout showing rent reasonableness standard for the unit.

What To Do When a Landlord Returns a Check

When a landlord returns a check due to overpayment, please process the check appropriately. If a reimbursement has not yet been requested, the check should be processed according to the subrecipient’s internal financial controls. When a reimbursement claim has been made but not yet paid out, please contact the claims department (claims@iheda.in.gov) and your grants analyst

(communityservices@ihcda.in.gov) to alert them of the issue. The corresponding claim will then be denied and must be corrected before resubmitting. When a reimbursement claim has been requested and paid, please follow the repayment process. A repayment transaction consists of a subrecipient repaying funds to the State. The transaction will initiate a repayment from the award subrecipient that will go back into the award amount. This will offset a subrecipient payment while the funds that are repaid will be available in the award budget and remaining balance.⁴³

Records to Maintain – Program Participants

Record	Criteria
Homelessness Status and Eligibility Certification	<ul style="list-style-type: none"> Homeless At-Risk Documentation Form
Income Worksheet, as applicable	<ul style="list-style-type: none"> Income Calculation Worksheet
Supporting Documentation of Sources of Income	<ul style="list-style-type: none"> Third-party verification of proof of gross annual income is needed for all members of the household age 18 and over Minimum of two pay stubs reflecting frequency of pay and current within 30 days Pay stubs, SSI/SSDI award letter/printout, child support statement, EBT statement for TANF If program participant does not have income to document, the zero income affidavit must be included
Photo Identification	<ul style="list-style-type: none"> Needed for all members of the household age 18 and over Driver’s license, State ID, temporary ID/license, school ID with photo, passport-U.S. or foreign, U.S. passport card, permanent resident card, etc. If proof of ID is unavailable upon entry, agencies must adequately document efforts to obtain these and follow up in case management notes when ID has been received
Initial Consultation Documentation	<ul style="list-style-type: none"> Agency Intake Documentation or HMIS Intake
Case Management Documentation	<ul style="list-style-type: none"> Assessing, arranging, coordinating, and monitoring delivery of services to facilitate housing stability Notes must be dated and detail housing goals, plans, referrals
Proof of Need	<ul style="list-style-type: none"> Documentation provided by participant to determine amounts/types of assistance needed for the household to gain stability in permanent housing Utility bills, lease, arrears, and/or eviction documentation
Proof of Payment for ESG-CV reimbursement	<ul style="list-style-type: none"> Canceled check or bank statement showing payments cleared highlighted and/or returned checks log
Rental Assistance Agreement	<ul style="list-style-type: none"> Agreement between the landlord and ESG-CV subrecipient Applicable only to households receiving ongoing rental assistance (n/a for arrears-only assistance)

⁴³ Additional information regarding repayments and returns of funds can be found [here in the desk guide](#).

Lease or Sublease	<ul style="list-style-type: none"> Lease between program participant and landlord or sublease between the program participant and the lease holder Households assisted with ongoing rental assistance must have a written lease or sublease for the rental unit
Habitability Inspection	<ul style="list-style-type: none"> Housing Habitability Standards Form
Lead-based Paint Inspection	<ul style="list-style-type: none"> Lead-Based Paint Exemption⁴⁴ Lead-Based Paint Disclosure Lead-Based Paint Maintenance Agreement
Rent Reasonableness Certification	<ul style="list-style-type: none"> GoSection8 valuation (print out)
Consent Form	<ul style="list-style-type: none"> Signed client participation agreement
Social Security Information	<ul style="list-style-type: none"> Card/number needed for all members of the household Social Security Card, printout from social security office If proof of ID is unavailable upon entry, agencies must adequately document efforts to obtain these and follow up in case management notes when ID has been received

Program Guidelines

Per 24 CFR 576 Subpart E, every ESG-CV subrecipient must develop and implement program guidelines that include:

- Procedure for determining and prioritizing which eligible individuals and families will receive Homeless Prevention and which eligible individuals and families will receive Rapid Rehousing assistance.
- Procedure for determining what percentage or amount of rent and utilities cost each program participant must pay while receiving Homelessness Prevention assistance.
- Procedure for determining how long a program participant will be provided rental assistance and whether and how the amount of that assistance will be adjusted over time.
- Procedure for determining the type, amount, and duration of housing stabilization and/or relocation services to provide, including the limits, if any, on the Homelessness Prevention assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months in the program, or the maximum number of times the program participant may receive assistance.
- Policy for addressing the needs of ineligible applicants.

Rapid Rehousing

To move literally homeless individuals and families (24 CFR 576.104) quickly into permanent housing and achieve stability in that housing.

⁴⁴ Updated 3/9/2023 in compliance with ESG requirements

Eligibility

Participants must meet Category 1 or 4 of HUD's homeless definition⁴⁵, which must be determined upon initial evaluation. Upon re-evaluation, the individual or family must have an annual income that is at or below 50 percent (50%) of the area median income (AMI), as determined by HUD.

Eligible Activities – Housing Relocation and Stabilization Services

Costs associated with providing services to individuals and families, including:

Housing Search and Placement Services

Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing are eligible, including:

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

Housing Stability Case Management

Assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing are eligible. This assistance cannot exceed 60 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing. Component services and activities consist of:

- Using the centralized or coordinated assessment system as required under [24 CFR 576.400\(d\)](#) to evaluate individuals and families applying for or receiving Rapid Rehousing
- Conducting the initial evaluation required under [24 CFR 576.401\(a\)](#), including verifying and documenting eligibility, for individuals and families applying for Rapid Rehousing
- 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 required under [24 CFR 576.401\(b\)](#)
- Using the centralized or coordinated assessment system as required under [24 CFR 576.400\(d\)](#)

⁴⁵ Criteria for defining homelessness categories can be found in [Appendix C](#).

- Conducting the initial evaluation required under 24 CFR 576.401(a), including verifying and documenting eligibility
- Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking
- Developing an individualized housing and service plan, including planning a path to permanent housing stability.

Mediation

Paying 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, is eligible.

Legal Services

Legal services are limited to those services necessary to help program participants obtain housing or keep a program participant from losing housing where they currently reside. Immigration and citizenship matters and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements are ineligible costs.

Credit Repair

Paying for credit counseling and other services necessary to assist program participants with critical financial skills are eligible, including skills related to:

- Household budgeting
- Managing money
- Accessing a free personal credit report
- Resolving personal credit problems

This assistance DOES NOT include the payment or modification of a debt.

Personal Protective Equipment (PPE)

In CPD-21-08 HUD authorized ESG-CV funds to be used under 24 CFR 576.102(a)(1) to purchase equipment used for protection from coronavirus by both Rapid Rehousing service providers and eligible clients, including:

- Face masks or shields
- Hand sanitizer
- Disposable gloves

Furniture and Household Furnishings

Buying furniture and household furnishings for use by program participants while they are receiving Rapid Rehousing assistance is eligible. These furnishings and furniture are subject to the requirements for equipment at 2 CFR 200.313. **Upon the termination of Rapid Rehousing assistance, the program participant must return all furniture and household furnishings that were reimbursed with ESG-CV funding to the subrecipient.** These furnishings and furniture may be reused by the subrecipient for multiple households, as long as those households are receiving Rapid Rehousing assistance.

Renters' Insurance

Paying for renters' insurance for program participants receiving Rapid Rehousing assistance is eligible. In order to pay for renters' insurance for program participants, the subrecipient must:

1. Demonstrate that the payment of renters' insurance is necessary to obtain or maintain housing (e.g., the landlord requires renters to have renters' insurance to reside in the unit); and
2. Pay the renters' insurance directly to the insurance company on behalf of the program participant.

Childcare, Education, Employment, and Life Skills Services⁴⁶

Staffing for the provision of childcare services such as providing meals, snacks, and appropriate developmental activities are eligible. The children must be under the age of 13, unless they are disabled. Disabled children must be under the age of 18. The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.

Providing program participants with basic knowledge and skills so they can obtain and maintain housing is eligible. This education should be focused on instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, or General Educational Development (GED). These services or activities include:

- Screening, assessment, and testing
- Tutoring
- Counseling
- Individual or group instruction
- Books and instructional material
- Referral to community resources

Providing employment assistance and job training for program participants is eligible. This can be through classroom, online, computer instruction, and/or on-the-job training. This employment assistance and job training should assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. These services or activities include:

- Acquisition of vocational licenses and/or certificates
- Employment screening, assessment, and testing
- Special training and tutoring, including literacy training and prevocational training
- Books and instructional material
- Counseling or job coaching
- Referral to community resources.

Teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance use, and being homeless is eligible. These must be skills that are necessary to assist the program participant to function independently in the community, including:

- Budgeting resources
- Managing a household
- Shopping for food and needed items
- Using public transportation
- Managing money
- Resolving conflict
- Improving nutrition
- Parenting

⁴⁶ Originally eligible only under Essential Services for Standard and Temporary Emergency Shelter, CPD-21-08 has made all Essential Services under 24 CFR 576.102(a)(1) also eligible under the Housing Relocation and Stabilization Services subcomponent of the Rapid Rehousing component for ESG-CV.

Health, Mental Health, and Substance Abuse Services

Direct outpatient treatment of medical conditions provided by licensed medical professionals (to the extent that other appropriate health services are unavailable within the community) are eligible, including:

- 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 emergency medical services
- Medication and follow-up services
- Preventive and non-cosmetic dental care

Direct outpatient treatment of mental health conditions provided by licensed medical professionals (to the extent that other appropriate health services are unavailable within the community) are eligible, including:

- Application of therapeutic processes to personal, family, situational, or occupational problems
- Crisis interventions
- Individual, family, or group therapy sessions
- Prescription of psychotropic medications
- Explanations about the use and management of medications

Substance abuse treatment services designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors that are provided by licensed or certified professionals (to the extent that other appropriate health services are unavailable within the community) are eligible, including:

- Client intake and assessment
- Outpatient treatment for up to 30 days
- Group and individual counseling and drug testing
- Inpatient detoxification and other inpatient drug or alcohol treatment ARE NOT eligible costs.

Transportation

Transportation costs of a program participant's travel to and from medical care, employment, childcare, or other eligible essential services facilities are eligible⁴⁷, including:

- Public transportation for program participants to and from permanent housing and service facilities
- Travel costs for service workers to accompany or assist program participants to use public transportation to and from permanent housing and service facilities
- Travel costs for service workers to visit program participants using their own vehicle⁴⁸

⁴⁷ Transportation for coronavirus testing and vaccination is eligible under Rapid Rehousing but is billed under a separate subcomponent than other Rapid Rehousing transportation costs.

⁴⁸ Travel costs can be reimbursed using the Federal mileage rate.

- Costs associated with purchasing or leasing a vehicle in which staff transports program participants and/or staff serving program participants⁴⁹

Services for Special Populations

Any of the essential services listed above that have been tailored to address the special needs of homeless youth, victims of domestic violence and related crimes/threats, and/or people living with HIV/AIDS who are homelessness.

Eligible Activities – Financial Assistance

Direct financial payments to housing owners, utility companies, and other third parties for a tenant are eligible, including:

Moving Costs

Paying for moving costs, such as truck rental or hiring a moving company are eligible. This assistance may include payment of temporary storage fees for up to three months, provided that the fees are accrued after the date the program participant begins receiving Housing Relocation and Stabilization Services under Rapid Rehousing and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.

Rent Application Fees

Paying for the rental housing application fee that is charged by the owner to all applicants is eligible. If the household has multiple members who are required to pay a fee, each rental application fee charged to the household can be reimbursed.

Last Month's Rent

If necessary to obtain housing for a program participant, paying the last month's rent to the owner of that housing at the time the owner is paid the security deposit and the first month's rent is eligible. This assistance must not exceed one month's rent.

Security and Utility Deposits

Paying for a standard security deposit required by the landlord for all customers is eligible. Paying for a standard utility deposit required by the utility company for all customers for the following utilities is also eligible:

- | | |
|---------|------------|
| • Gas | • Electric |
| • Water | • Sewage |

Utility Payments

Paying for up to 24 months of utility payments per program participant, per service is eligible. 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 include:

- | | |
|---------|------------|
| • Gas | • Electric |
| • Water | • Sewage |

⁴⁹ The cost of gas, insurance, taxes, and maintenance for the vehicle are also eligible expenses

Utility Arrears

Paying up to six months of arrears, including late fees on the arrears, of utility payments per program participant, per service is eligible. 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 include:

- Gas
- Water
- Electric
- Sewage

Additional Eligible Payments

Sub-recipients may also pay up to one month's rent for a unit previously occupied by a program participant who then moves out; this should be in order to keep the unit available for other program participants.

Eligible Activities – Rental Assistance

Direct rental payments to housing owners, landlords, and other third parties for a tenant are eligible.

Rental assistance may not be provided to a program participant who is currently receiving rental assistance under another program. Eligible costs include the following:

Short-Term Rental Assistance

Providing up to three months of rental assistance. Short-term 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.

Medium-Term Rental Assistance

Providing between 3 and 24 months of rental assistance. Medium-term 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.

Rental Arrears

One-time payment of up to six months rental arrears, including late fees on the arrears.

Eligible Activities – Disease Mitigation Training

Training specifically on infectious disease prevention and mitigation for ESG-CV-funded staff working directly to prevent, prepare for, and respond to coronavirus among persons who are homeless with Rapid Rehousing activities.

Eligible Activities – Hazard Pay⁵⁰

Hazard pay for staff working directly to prevent, prepare for, and respond to coronavirus among persons who are homeless with Rapid Rehousing activities. This includes any staff who are putting themselves in proximity to persons with coronavirus or working in locations with a high likelihood of contracting coronavirus for Rapid Rehousing activities. Hazard pay should only be provided to staff for the hours in which they are putting themselves at risk while providing Rapid Rehousing services. This time should be

⁵⁰ IHCD's full hazard pay guidance is outlined in [Appendix G](#).

tracked separately on timesheets from time spent providing these same services without putting themselves at risk.

Eligible Activities – Volunteer Incentives

Providing reasonable incentives for volunteers who are currently helping to provide necessary Rapid Rehousing during the coronavirus outbreak. Incentives can be provided for volunteering done in the past by an individual (within the grant period), but only if they are continuing to volunteer after the payment of the incentive. Timesheets or sign-in sheets should be kept for tracking the volunteer's involvement. Eligible incentives include:

- Cash
- Gift cards
- Meals before, during, or after time spent volunteering
- Other⁵¹

Eligible Activities – Landlord Incentives

Providing reasonable and necessary incentives for landlords to obtain housing for homeless individuals and families is eligible. **However, a recipient may not use ESG-CV funds to pay the landlord incentives in an amount that exceeds three times the rent charged for the unit.** These incentives must be agreed upon between the subrecipient and the landlord prior to the program participant being housed and included in the rental assistance agreement to be eligible under ESG-CV. These incentives include:

- Signing bonuses equal to up to two months of rent
- Security deposits equal to up to three months of rent⁵²
- Repair costs for damages incurred by the program participant not covered by the security deposit or that are incurred while the program participant is still residing in the unit
- Cleaning and maintenance costs for the unit or appliances

Eligible Activities – Vaccine Incentives

Making direct, cash payments of up to \$50.00 per dose to Rapid Rehousing-eligible clients as an incentive for receiving a coronavirus vaccine, for a max of \$100.00 in total cash payments per client. For single-dose vaccines, the client can receive one cash payment of \$50.00. For two-dose vaccines, the client can receive two separate cash payments of \$50.00 each. Clients must present an official COVID-19 Record Card as proof that they received the dose. ESG-CV funds may only be used for vaccine incentives to the extent that other vaccine incentives are inaccessible or unavailable to people experiencing homelessness within the community.

Eligible Activities – Vaccine and Testing Transportation

Transportation costs specifically for the transportation of Rapid Rehousing-eligible clients to and from coronavirus testing and vaccination sites is eligible as a separate subcomponent under Rapid Rehousing, including:

⁵¹ IHCD's full volunteer incentives policy is outlined in [Appendix F](#).

⁵² These are separate from the costs of security deposits under the Financial Assistance subcomponent of Rapid Rehousing.

- Costs of transporting individuals and families using vehicles owned by the subrecipient to and from coronavirus testing and vaccination sites⁵³
- Cost of public transportation for individuals and families to and from coronavirus testing and vaccination sites
- Cost for staff to accompany or assist participants to use public transportation to and from coronavirus testing and vaccination sites
- Costs associated with purchasing or leasing a vehicle in which staff transports program participants and/or staff serving program participants⁵⁴

Forms of Rental Assistance

Rental Assistance can come in one-of-three forms:

Tenant-based Rental Assistance

A program participant may select a housing unit in which to live and may move to another unit or building and continue to receive rental assistance, as long as the program participant continues to meet the program requirements. The recipient may require that all program participants live within a particular area for the period in which the rental assistance is provided. There must be a lease between the owner and the program participant. Prior to assistance, the subrecipient and the owner must have a rental assistance agreement. The rental assistance agreement must terminate and no further rental assistance payments under that agreement may be made if:

1. The program participant moves out of the housing unit for which the program participant has a lease; or
2. The lease terminates and is not renewed; or
3. The program participant becomes ineligible to receive ESG-CV rental assistance under Rapid Rehousing

Project-Based Rental Assistance

The subrecipient may enter into a rental assistance agreement with the owner of an ESG-CV-eligible permanent housing unit to reserve the unit and subsidize its rent prior to a program participant moving into the unit. The rental assistance agreement may cover one or more permanent housing units in the same building. Each unit covered by the rental assistance agreement may only be occupied by ESG-CV-eligible program participants. The following rules apply to all project-based rental assistance:

- The subrecipient may pay up to 100 percent (100%) of the first month's rent, provided that a program participant signs a lease with the owner and moves into the unit before the end of the month for which the first month's rent is paid.
- The rent paid before a program participant moves into the unit must not exceed the rent to be charged under the program participant's lease and must be included when determining that program participant's total rental assistance.

⁵³ This can be reimbursed using the Federal mileage rate.

⁵⁴ The cost of gas, insurance, taxes, and maintenance for the vehicle are also eligible expenses

- The subrecipient may make monthly rental assistance payments only for each whole or partial month an assisted unit is leased to a program participant, except that if a program participant moves out of an assisted unit before expiration of the agreement.
- The subrecipient may use ESG-CV funds to cover up to 100 percent (100%) of the rent for the unit for up to 30 days from the end of the month in which the unit was vacated while the subrecipient attempts to house another eligible program participant in that unit.
- The previously listed payment will not count toward the total rental assistance provided to the next program participant housed in the unit, unless the program participant moves in during the first half of the month that is paid using this flexibility.
- This payment will not prevent paying up to 100 percent (100%) of the first month's rent for the new program participant as long as the payments are made for different months.

The program participant's lease must not condition the term of occupancy to the provision of rental assistance payments. If the program participant is determined ineligible or reaches the maximum number of months over which rental assistance can be provided, then the subrecipient must suspend or terminate the rental assistance payments for the unit. If the payments are suspended, the individual or family may remain in the assisted unit as permitted under the lease, and the subrecipient may resume payments if the individual or family again becomes eligible and needs further rental assistance. If the payments are terminated, the rental assistance may be transferred to another available unit in the same building, provided that the other unit meets all ESG-CV requirements.

The rental assistance agreement between the subrecipient and the owner must have an initial term of no less than one year. When a new program participant moves into an assisted unit, the term of the rental assistance agreement may be extended to cover the initial term of the program participant's lease. If the program participant's lease is renewed, the rental assistance agreement may be renewed or extended, as needed, up to the maximum number of months for which the program participant remains eligible.

Sponsor-Based Rental Assistance

The subrecipient must execute a sponsor-based rental assistance agreement with a separate government agency, instrumentality, or nonprofit organization (“sponsor”) to subsidize the rent of program participants who are referred to be housed in units owned or leased by the sponsor. The rental assistance agreement may cover one or more permanent housing units owned or leased by the sponsor. Each unit covered by the rental assistance agreement may only be occupied by program participants. The following rules apply to all sponsor-based rental assistance:

1. The subrecipient may pay up to 100 percent (100%) of the rent for the first month that the sponsored unit becomes available for rent to a new program participant, provided that a program participant signs a lease or sublease and moves into the unit before the end of the month for which that first month's rent is paid.
2. The rent paid before a program participant moves into the unit must not exceed the rent to be charged under the new program participant's lease or sublease, and unless the program

participant moves in during the last half of the month that is paid, this payment must be included when determining that program participant's total rental assistance.

3. The previously listed payment be at the beginning of the agreement or after the payment permitted in the following paragraph, as long as payments are made for different months.
4. The subrecipient may make monthly rental assistance payments only for each whole or partial month a sponsored unit is leased or subleased to a program participant, except that if a program participant moves out of a sponsored unit before expiration of the rental assistance agreement.
5. The subrecipient may use ESG-CV funds to cover up to 100 percent (100%) of the rent for the unit for up to 30 days from the end of the month in which the unit was vacated while the subrecipient work together with the sponsor to house another eligible program participant in that unit.
6. The previously listed payment will not count toward the total rental assistance provided to the next program participant housed in the unit, unless the program participant moves in during the first half of the month that is paid using this flexibility.
7. The subrecipient may require that the program participant rent a unit owned by the sponsor to benefit from sponsor-based rental assistance. However, in no case may a subrecipient execute a sponsor-based rental assistance agreement with itself or its parent or subsidiary organization.

In all other respects, sponsor-based rental assistance must be administered in accordance with the same requirements that apply to tenant-based and project-based rental assistance under [24 CFR 576](#), the waivers and alternative requirements in [CPD-21-08](#), and the ESG-CV Desk Guide; except that:

- The references to “owner” and “housing owner” will be understood to refer to the “sponsor” when those terms appear in when those terms appear in the [24 CFR 576.105](#), [24 CFR 576.106](#), [24 CFR 576.409](#), and [24 CFR 576.500\(h\)](#);
- The references to “lease” will be understood to refer to the lease or sublease (as applicable) between the program participant and the sponsor for the “sponsored unit” in which the program participant will reside when those terms appear in [24 CFR 576.105](#), [24 CFR 576.106](#), [24 CFR 576.409](#), and [24 CFR 576.500\(h\)](#); and
- The references to “project-based rental assistance” will be understood to refer to “sponsor-based rental assistance” when that term appears in [24 CFR 576.409](#).

Leases, Subleases, and Rental Assistance Agreements

Within this ESG-CV Desk Guide, [CPD-21-08](#), and [24 CFR 576](#) “lease” refers to a legally binding, written lease for the rental unit. This must be between the owner and the program participant. Where the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease, if the agreement gives the program participant an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented by the owner's financial records, rent ledgers, or canceled checks. For program participants living in housing with project-based rental assistance, the

lease must have an initial term of no less than one year. Each lease executed on or after December 16, 2016, must include a lease provision or incorporate a lease addendum that includes all requirements that apply to tenants, the owner or lease under 24 CFR 5 Subpart L (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), as supplemented by 24 CFR 576.409, including the prohibited bases for eviction and restrictions on construing lease terms under 24 CFR 5.2005(b) and (c). If the housing is not assisted under another “covered housing program” as defined in 24 CFR 5.2003, the lease provision or lease addendum may be written to expire at the end of the rental assistance period.

In CPD-21-08 HUD authorized ESG-CV funds to be used under 24 CFR 576.105 and 24 CFR 576.106 for program participants who are subleasing. Within this ESG-CV Desk Guide, CPD-21-08, and 24 CFR 576, “sublease” refers to a legally valid sublease with the primary leaseholder for the rental unit. When a program participant chooses to sublease a unit:

- The references to “owner” and “housing owner” will be understood to refer to the “primary leaseholder” when those terms appear in the ESG-CV Desk Guide, CPD-21-08, 24 CFR 576.105, 24 CFR 576.106, 24 CFR 576.409, and 24 CFR 576.500(h); and
- The references to “lease” will be understood to refer to the sublease, when that term appears in the ESG-CV Desk Guide, CPD-21-08, 24 CFR 576.105, 24 CFR 576.106, 24 CFR 576.409, and 24 CFR 576.500(h).

Within this ESG-CV Desk Guide, CPD-21-08, and 24 CFR 576, “rental assistance agreement” refers to a documented agreement between the subrecipient providing rental assistance and the owner of the unit. This agreement establishes the terms under which rental assistance will be provided, and it requires the owner to provide a copy of any notice provided to program participants to vacate the housing unit or any complaint used under State or local law to evict the program participant to the agency providing ESG-CV rental assistance. This is not a legally binding agreement and is not the same as a lease or sublease.

Housing Stability Case Management

While providing Rapid Rehousing, the case manager must develop a plan to assist the program participant to retain permanent housing after the ESG-CV assistance ends, taking into account all relevant considerations, such as the participant’s current or expected income and expenses; other public or private assistance for which the participant will be eligible and likely to receive; and the relative affordability of available housing in the area. Assistance cannot exceed 60 days during the period the program participant is seeking permanent housing.

Using Rental Assistance with Other Subsidies

Rental assistance cannot be provided to program participants receiving tenant-based rental assistance or living in a housing unit receiving project-based rental assistance or operating assistance through other public sources for the same time period. Rental arrears can be provided to households receiving rental subsidies for the tenant portion of the rent.

Rent Restrictions

Rental units must comply with rent reasonableness standards (24 CFR 982.507). FMR (Fair Market Rent) standards in place for regular ESG funds have been waived for ESG-CV. **For ESG-CV funding, IHCD has**

determined that the Rent Reasonableness Standard will be the total of the GoSection8 calculation plus \$200. Rent for units assisted with ESG-CV funding must not exceed the sum total of the rent reasonableness standard + \$200. Rent must be reasonable when compared to other units of similar location, type, size, and amenities within the community. Requirements do not apply for households not receiving ESG-CV rental assistance. Rent reasonableness is determined using the GoSection8 website calculation. Compliance with this requirement should be documented with the GoSection8 website printout showing rent reasonableness standard for the unit.

Lead-Based Paint and Minimum Habitability Standards

All housing occupied by ESG-CV program participants must be inspected for lead-based paint in accordance with 24 CFR 35. ESG-CV funds must be used to help participants obtain or maintain housing that meets either the minimum habitability standards from 24 CFR 576.403 or the Housing Quality Standards (HQS) under 24 CFR 982.40182.

Records to Maintain – Program Participants

Record	Criteria
Homelessness Status and Eligibility Certification	<ul style="list-style-type: none"> • Homeless At Risk Documentation Form
Income Worksheet, as applicable	<ul style="list-style-type: none"> • Income Calculation Worksheet
Supporting Documentation of Sources of Income	<ul style="list-style-type: none"> • Third-party verification of proof of gross annual income is needed for all members of the household age 18 and over • Minimum of two pay stubs reflecting frequency of pay and current within 30 days • Pay stubs, SSI/SSDI award letter/printout, child support statement, EBT statement for TANF • If program participant does not have income to document, the zero income affidavit must be included
Photo Identification	<ul style="list-style-type: none"> • Needed for all members of the household age 18 and over • Driver’s license, State ID, temporary ID/license, school ID with photo, passport-U.S. or foreign, U.S. passport card, permanent resident card, etc. • If proof of ID is unavailable upon entry, agencies must adequately document efforts to obtain these and follow up in case management notes when ID has been received
Initial Consultation Documentation	<ul style="list-style-type: none"> • Agency Intake Documentation or HMIS Intake
Case Management Documentation	<ul style="list-style-type: none"> • Assessing, arranging, coordinating, and monitoring delivery of services to facilitate housing stability • Notes must be dated and detail housing goals, plans, referrals
Proof of Need	<ul style="list-style-type: none"> • Documentation provided by participant to determine amounts/types of assistance needed for the household to gain stability in permanent housing • Utility bills, lease, arrears, and/or eviction documentation

Proof of Payment for ESG-CV reimbursement	<ul style="list-style-type: none"> • Canceled check or bank statement showing payments cleared highlighted and/or returned checks log
Rental Assistance Agreement	<ul style="list-style-type: none"> • Agreement between the landlord and ESG-CV subrecipient • Applicable only to households receiving ongoing rental assistance (n/a for arrears-only assistance)
Lease or Sublease	<ul style="list-style-type: none"> • Lease between program participant and landlord or sublease between the program participant and the lease holder • Households assisted with ongoing rental assistance must have a written lease or sublease for the rental unit
Habitability Inspection	<ul style="list-style-type: none"> • Housing Habitability Standards Form
Lead-based Paint Inspection	<ul style="list-style-type: none"> • Lead-Based Paint Exemption • Lead-Based Paint Disclosure • Lead-Based Paint Maintenance Agreement
Rent Reasonableness Certification	<ul style="list-style-type: none"> • GoSection8 valuation (print out)
Consent Form	<ul style="list-style-type: none"> • Signed client participation agreement
Social Security Information	<ul style="list-style-type: none"> • Card/number needed for all members of the household • Social Security Card, printout from social security office • If proof of ID is unavailable upon entry, agencies must adequately document efforts to obtain these and follow up in case management notes when ID has been received

Program Guidelines

Per 24 CFR 576 Subpart E, every ESG-CV subrecipient must develop and implement program guidelines that include:

- Procedure for determining and prioritizing which eligible individuals and families will receive Homeless Prevention and which eligible individuals and families will receive Rapid Rehousing assistance.
- Procedure for determining what percentage or amount of rent and utilities cost each program participant must pay while receiving Rapid Rehousing assistance.
- Procedure for determining how long a program participant will be provided rental assistance and whether and how the amount of that assistance will be adjusted over time.
- Procedure for determining the type, amount, and duration of housing stabilization and/or relocation services to provide, including the limits, if any, on the Rapid Rehousing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months in the program, or the maximum number of times the program participant may receive assistance.
- Policy for addressing the needs of ineligible applicants.

HMIS

Homeless Management Information System (HMIS) or comparable database participation is a requirement of receiving ESG-CV funds. Therefore, costs associated with contributing data to the HMIS or comparable database are eligible for reimbursement (24 CFR 576.107) for agencies funded under the HMIS component. Activities must comply with HUD's standards on participation, data collection and reporting, including compliance with HUD's 2022 HMIS Data Dictionary and 2022 HMIS Data Standard Manual. In addition, the 2019 ESG Program HMIS Manual addresses the use of HMIS for ESG, to complement and support data collection and reporting efforts of HMIS users.⁵⁵

Eligible Activities – HMIS

In response to coronavirus, HUD has waived the limitations on eligible activities provided in section 415(a) of the McKinney-Vento Act and 24 CFR 576 Subpart B are waived to the extent necessary to authorize ESG-CV funds to be used under 24 CFR 576.107 to pay for HMIS costs beyond where they are related to collecting data on ESG-CV program participants and ESG-CV program activities to the extent they are necessary to help the geographic area prevent, prepare for, and respond to coronavirus. Additionally, 24 CFR 576.107 that limits recipients to paying for the costs at 24 CFR 576.107(b) has been waived to allow recipients that are not the HMIS Lead, as designated by the CoC, to pay for costs at 24 CFR 576.107(b), either directly or by sub-granting to the HMIS Lead if the HMIS Lead is an eligible subrecipient to the extent that the HMIS costs are necessary to help the geographic area prevent, prepare for, and respond to coronavirus. Therefore, the following costs are eligible for all Sub-recipients funded with HMIS:

- Hardware, equipment and software costs:
 - Purchasing or leasing computer hardware
 - Purchasing software or software licenses
 - Purchasing or leasing equipment, including telephones, taxes, and furniture
- Staffing:
 - Salaries for operating the HMIS
 - Data collection and reporting
 - Completing data entry
 - Monitoring and reviewing data quality
 - Completing data analysis
- Training staff on using the HMIS or comparable database:
 - Implementing and complying with HMIS requirements
 - Training and overhead
 - Obtaining technical support
 - Leasing office space
 - Paying charges for electricity, gas, water, phone service and high-speed data transmission necessary to operate or contribute data to the HMIS

⁵⁵ See [Appendix C](#) for additional HMIS resources.

- Paying costs of staff to travel to and attend HUD-sponsored and HUD-approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act⁵⁶
- Paying staff travel costs to conduct intake
- Paying participant fees charged by the HMIS lead agency
- Hosting and maintaining HMIS software or data
- Backing up, recovering, or repairing HMIS software or data
- Administering the HMIS system
- Reporting to providers, the CoC, HUD, and IHCD
- Conducting training on using the system or a comparable database, including travel
- Assessing if victim services providers databases are HMIS comparable and providing verification to IHCD

Eligible Activities – Disease Mitigation Training

Training specifically on infectious disease prevention and mitigation for ESG-CV funded staff working directly to prevent, prepare for, and respond to coronavirus among persons who are homeless or at risk of homelessness with HMIS activities.

Records to Maintain – Administration

Activity	Acceptable Forms of Documentation (both cost incurred and proof of payment are required)	
	Cost Incurred	Proof of Cleared Payment
Bills paid Services performed Materials purchased	<ul style="list-style-type: none"> ● Invoice ● Receipt 	<ul style="list-style-type: none"> ● Canceled checks or bank statement with ESG-CV payments highlighted
Travel costs	<ul style="list-style-type: none"> ● Travel request that includes date(s) of travel, from/to, purpose of travel, supporting documentation 	<ul style="list-style-type: none"> ● Canceled checks, bank with ESG-CV payments highlighted
Employee Compensation	<ul style="list-style-type: none"> ● Timesheets signed by supervisor and employee detailing eligible ESG-CV activities ● Pay stub or payroll report from a third party listing pay periods, employee listed, last four digits of SSN 	<ul style="list-style-type: none"> ● Copy of pay stub or payroll report from third party ● Bank statement with ESG-CV payments highlighted

⁵⁶ Sub-recipients must verify with IHCD that the ESG-CV training is HUD-sponsored prior to requesting reimbursement for any costs associated with attending them

Administration

The Administration component is intended to support ESG-CV Sub-recipients' costs incurred to meet the grant requirements (24 CFR 576.108). As permitted by the CARES Act, ESG-CV Subrecipients may expend up to 8 percent (8%) of a grant award for administrative costs if funded under the Administration component. **Staff and overhead costs directly related to carrying out Street Outreach, Standard Emergency Shelter, Temporary Emergency Shelter, Homelessness Prevention, Rapid Rehousing, and HMIS activities are not eligible to be reimbursed under Administration.** Direct staff costs should be claimed under Case Management.

Eligible Activities

General Management, Oversight, and Coordination

Salaries, wages, and related costs of the recipient's staff, the staff of subrecipients, or other staff engaged in program administration. In charging costs to this category, the recipient may use one of the following methods:

1. Include the entire salary, wages, and related costs allocable to the program of each person whose primary responsibilities with regard to the program involve program administration assignments; or
2. Include the pro rata share of the salary, wages, and related costs of each person whose job includes any program administration assignments.

The recipient may use only one of these methods for each fiscal year grant. Program administration assignments include the following:

- Preparing program budgets and schedules, and amendments to those budgets and schedules
- Developing systems for assuring compliance with program requirements
- Developing interagency agreements and agreements with contractors to carry out program activities
- Monitoring program activities for progress and compliance with program requirements
- Preparing reports and other documents directly related to the program for submission to HUD
- Coordinating the resolution of audit and monitoring findings
- Evaluating program results against stated objectives
- Managing or supervising persons whose primary responsibilities with regard to the program include such assignments as those described above

Administrative services performed under third party contracts or agreements are also eligible, including:

- General legal services
- Accounting services
- Monitoring services
- Audit services

Goods and services required for administration of the program are also eligible, including:

- Rental or purchase of equipment
- Office supplies
- General liability insurance
- Utilities for office space
- Rental of office space
- Maintenance of office space

Training on ESG-CV Requirements, including:

- Costs of providing training on ESG-CV requirements
- Costs of attending HUD-sponsored ESG-CV trainings⁵⁷

Records to Maintain – Administration

Activity	Acceptable Forms of Documentation (both cost incurred and proof of payment are required)	
	Cost Incurred	Proof of Cleared Payment
Bills paid Services performed Materials purchased	<ul style="list-style-type: none"> • Invoice • Receipt 	Canceled checks or bank statement with ESG-CV payments highlighted
Travel costs	<ul style="list-style-type: none"> • Travel request that includes date(s) of travel, from/to, purpose of travel, supporting documentation 	Canceled checks, bank with ESG-CV payments highlighted
Employee Compensation	<ul style="list-style-type: none"> • Timesheets signed by supervisor and employee detailing eligible ESG-CV activities • Pay stub or payroll report from a third party listing pay periods, employee listed, last four digits of SSN 	Copy of pay stub or payroll report from third party Bank statement with ESG-CV payments highlighted

Ineligible Activities

Ineligible activities include, but are not limited to:

- Damage costs outside of the security deposit
- Mortgage payments
- Late fees accrued by the subrecipient
- Subrecipient employee salary advances
- Renovations
- Vehicles
- Travel to CoC Meetings or trainings

⁵⁷ Sub-recipients must verify with IHCD that the ESG-CV training is HUD-sponsored prior to requesting reimbursement for any costs associated with attending them.

Other Federal Requirements

Involuntary Family Separation

Per 24 CFR 578.93, HUD-funded shelters and assisted housing are prohibited from causing involuntary family separation. The age and gender of a child under age 18 must not be used as a basis for denying any family's admission to a project that receives funds under this part. There are exceptions for housing for specific subpopulations; in these cases, Sub-recipients should review the full rule to ensure full compliance.

Equal Access in Accordance with an Individual's Gender Identity

In accordance with 24 CFR 5.105, providers that operate single-sex projects using funds awarded through the HUD's Office of Community Planning and Development will now be required to provide all individuals, including transgender individuals and other individuals who do not identify with the sex they were assigned at birth, with access to programs, benefits, services, and accommodations in accordance with their gender identity without being subjected to intrusive questioning or being asked to provide documentation. This requirement includes tenant selection and admission preferences. Sub-recipients must establish, amend, or maintain program admissions, occupancy, and operating policies and procedures (including policies and procedures to protect individuals' privacy and security), so that equal access is provided to individuals based on their gender identity.

Violence Against Women Act

The Violence Against Women Act (VAWA) prohibits denial of or termination of assistance solely due to an individual or family being a victim of domestic violence, dating violence, stalking, or sexual assault. VAWA also establishes program participants' right to emergency transfers for victims who are in fear for their life and safety to move to housing that they deem safe. This act requires housing providers/programs that administers ESG-CV rental assistance to notify all program participants of their rights under VAWA using HUD's Notification of Occupancy Rights at application, denial, or termination of assistance and at notification of eviction. Providers must also adopt HUD's model emergency transfer plan. Victims have a right to expressly request a relocation if they reasonably believe they are in imminent harm if they remain in the same dwelling. Program participants only need to self-certify using HUD's VAWA Protections and Certification Form. Providers must document requests and outcomes for emergency transfer requests which are required to be reported to IHCD and HUD. ESG-CV funds may be used to pay amounts owed for breaking lease to effect an emergency transfer; these costs are not subject to the 24 month limit on rental assistance. All rental assistance agreements between the landlord and the housing provider must specify that the landlord will provide a copy of notice to vacate/eviction proceedings to the ESG-CV program.

Appendices

Appendix A: Grant Documents

Grant Agreement

The grant agreement contains the components listed below. Completion instructions will be emailed to each subrecipient alongside the required forms.

- Non-Collusion and Acceptance Form
- Exhibit A: Additional Programmatic, Statutory, and Regulatory Requirements
- Exhibit B: Budget Agreement
- Appendix A, which includes
 - Certification of Local Approval for Non-Profit Organizations
 - Duplication of Benefits Affidavit

Before any funds can be released, all required grant documents must be completed and received by IHCD. All documents are signed and submitted via Adobe Sign. Sub-recipients with multiple ESG-CV grants must submit required documentation for each grant (i.e., agencies cannot submit one of each required document for multiple ESG-CV grants).

Grant Close-Out

To close out the grant, the subrecipient must submit the final payment request, along with the forms listed below.

- ESG-CV Grant Close Out Report
- ESG-CV Subrecipient Close Out Workbook

Appendix B – Client File Forms

Required documentation for client files consists of the following forms:

- ESG Client File Checklist Form (highly recommended)
- Homeless or At Risk of Homeless Documentation Form
- Coordinated/ Centralized Assessment
- HUD Income Checklist (for Homeless Prevention)
- Arizona Matrix Tool – embedded in HMIS
- Housing Plan-embedded in HMIS as a template under “case notes”
- Income Verification forms – as reference
- Zero Income Affidavit (if participant has no income)
- Income /Rent/ Utilities Calculation Form
- Initial Request for Unit Approval (included within the Rental Assistance Payment Contract (RAP))
- Housing Habitability Standards Form
- Lead Disclosure Form (If pregnant women and/or children under 6 will be living in a building built before 1978)
- Rental Assistance Payment Contract (RAP) between Sub-recipient and Tenant
- Rental Assistance Payment Contract (RAP) between Sub-recipient and Landlord
- Rent Reasonableness Certification from GoSection8 software
- Signed copy of Participant’s lease
- Termination & Appeal Policy & Procedure (Should have form signed by client to show they have received a copy of the policy)
- HUD Form 5380 Notice of Occupancy Rights under the Violence Against Women Act
- HUD Form 5381 Model Emergency Transfer Plan for Victims of Domestic Violence, Sexual Assault, or Stalking
- HUD Form 5382 Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and Alternate Documentation
- HUD Form 5383 Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking
- CoC VAWA and HUD Prohibited Lease Provisions Addendum (included within the RAP Contract)

Appendix C – Sources and Resources

[24 CFR 576: Code of Federal Regulations \(CFR\) Title 24 HUD, Part 576 for the Emergency Solutions Grants Program](#)

[ESG-CV Income Limits: The 50 percent Area Median Income \(AMI\) Limits for Indiana](#)

[ESG Law, Regulations, and Notices: HUD Exchange homepage for the ESG program](#)

[ESG-CV Prevent, Prepare, and Respond Tieback Flexibilities: Quick guide to documenting COVID-19 impact for ESG-CV eligibility](#)

[Disease Risk and Homelessness: HUD Exchange homepage for coronavirus updates and resources](#)

[ESG-CV Guidelines: CPD-21-08 titled “Waivers and Alternative Requirements for the Emergency Solutions Grants \(ESG\) Program Under the CARES Act”](#)

[ESG-CV Notice Summary: Provides brief summary of ESG-CV policies and guidance.](#)

[HMIS User Manual: IHCDAs instructional guide on using the Homeless Management Information System](#)

[HUD At-Risk of Homelessness Definition: HUD criteria for defining who is “at risk” of homelessness](#)

[HUD Homelessness Definition: HUD criteria outlining categories of homelessness](#)

[HUD Income Inclusions & Exclusions List: Notice providing official income inclusions/exclusions as set out in HUD HOME Guide Exhibits 3.1 and 3.2 24 CFR Part 5, which provides guidance for for determining income of ESG program participants](#)

[IHCDOnline: IHCDAs Grant Interface software](#)

[2022 HMIS Standard Manual: HUD Exchange webpage including updated HMIS Data Standards, Data Dictionary, and more](#)

[ESG Program HMIS Manual: HUD Exchange webpage for ESG specific HMIS Manual](#)

[Housing First: “Home, Together: The Federal Strategic Plan to Prevent and End Homelessness”](#)

[End Homelessness: National Alliance to End Homelessness](#)

[2-1-1 Indiana: Indiana FSSAs resource for homelessness and other resources in Indiana](#)

[Indiana Housing Now: IHCDAs webpage for renters, landlords, homeowners, and others who are seeking housing resources in the State of Indiana.](#)

[IHCDAs COVID-19 Toolkit: Resource guide and important COVID-19 updates from IHCDAs](#)

Appendix D: Glossary of Terms and Definitions

Responsible Entity

With respect to the environmental responsibilities under ESG-CV, a recipient under the program. As a direct recipient of the state, IHEDA will act as the Responsible Entity.

Prevent...coronavirus

An activity designed to prevent the initial or further spread of the coronavirus to people experiencing homelessness, people at risk of homelessness, recipient or subrecipient staff, or other shelter or housing residents. This includes providing Personal Protective Equipment to staff and program participants, paying for non-congregate shelter options such as hotels and motels, paying for handwashing stations and portable toilets for use by people living in unsheltered situations, and providing Rapid Rehousing or Homelessness Prevention assistance to individuals and families who are homeless or at risk of homelessness (as applicable) to reduce their risk of contracting or further spreading the coronavirus.

Prepare for...coronavirus

An activity carried out by a recipient or subrecipient prior to or during a coronavirus outbreak in their jurisdiction to plan to keep people healthy and reduce the risk of exposure to coronavirus and avoid or slow the spread of disease. This includes updating written standards to prioritize people at severe risk of contracting coronavirus for shelter and housing consistent with fair housing and nondiscrimination requirements, adapting coordinated entry policies and procedures to account for social distancing measures or increased demand, developing a strategy and recruiting landlords to provide housing to people experiencing homelessness or at risk of homelessness, training homeless providers on infectious disease prevention and mitigation, and implementing a non-congregate shelter strategy to reduce the spread of coronavirus.

Respond to coronavirus

An activity carried out once coronavirus has spread to people experiencing homelessness, provider staff, or once individuals and families lose or are at risk of losing their housing as a result of the economic downturn caused by coronavirus. This includes transporting individuals and families experiencing homelessness to medical appointments, paying for shelter to isolate individuals who have contracted coronavirus from other program participants and people experiencing homelessness, providing rental assistance to those who are at risk of losing their housing, have already become homeless, or continue to experience homelessness due to the economic downturn caused by coronavirus, and providing hazard pay to recipient or subrecipient staff who put their own health at risk to continue to provide necessary services to individuals and families experiencing and risk of homelessness.

Comparable Database

A relational database that meets all HMIS Data Standards and the minimum standards of HMIS privacy and security requirements, including HUD's most recent reporting standards and comma separated value (CSV) format specifications. The most recent standards, published April 2021, can be found [here](#).

Duplication of Benefits

When Federal financial assistance is provided to a person or entity through a program to address losses resulting from a Federally-declared emergency or disaster, and the person or entity has received (or would receive, by acting reasonably to obtain available assistance) financial assistance for the same

costs from any other source (including insurance), and the total amount received exceeds the total need for those costs.

Standard and Temporary Emergency Shelter (Component)

This component includes expenses for providing essential services for families and individuals in standard emergency shelters, operating standard emergency shelters. For the ESG-CV program, HUD introduced a new type of shelter: temporary emergency shelters. In accordance with the HMIS reporting format for ESG-CV, the Emergency Shelter component has two separate components:

- Standard Emergency Shelter
- Temporary Emergency Shelter

Organizations will apply for and be awarded these two components separately. ESG-CV awards for the Standard Emergency Shelter component may not be spent on expenses for the Temporary Emergency Shelter component, and vice-versa. For more details on which expenses are eligible under each component, please refer to the Standard Emergency Shelter and Temporary Emergency Shelter sections.

Standard and Temporary Emergency Shelters (Physical Space/Structure)

A facility, structure, or portion of a structure that serves to provide temporary shelter for the homeless that does not require any prerequisite occupancy agreements. All emergency shelters are classified as one of the following:

1. **Standard emergency shelter:** Any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements.
2. **Temporary emergency shelter:** Any structure or portion of a structure, which is used for a limited period of time because of a crisis, such as a natural disaster or public health emergency, to provide shelter for individuals and families displaced from their normal place of residence or sheltered or unsheltered locations. Must be determined by State or local health officials to be necessary to prevent, prepare for, and respond to coronavirus in order to be defined as a temporary emergency shelter.

If an emergency shelter meets the definitions of both standard and temporary emergency shelters, it is classified EXCLUSIVELY as a temporary emergency shelter.

Appendix E: IHEDA Volunteer Incentives Policy

The limitations on eligible activities provided in the McKinney-Vento Homeless Assistance Act and 24 CFR are waived and alternative requirements are established to the extent necessary to authorize ESG-CV funds to be used for cost of providing reasonable incentives to volunteers (e.g., cash or gift cards) who have been and are currently helping to provide necessary street outreach, emergency shelter, essential services, and housing relocation and stabilization services during the coronavirus outbreak. Waiving this requirement to allow the payment of reasonable costs of volunteer incentives will increase the number of people available to provide the needed services and connections to housing to individuals and families experiencing homelessness to prevent the spread of coronavirus. This could include an appreciation luncheon or similar activity.

Subrecipient organizations should have a written policy outlining how you will provide volunteer incentives. Your plan should state how much you plan to provide per volunteer or amount of incentive per number of hours, etc. Before claiming volunteer incentives, you will need to submit a copy of your policy and plan to IHEDA for approval. Volunteer incentive plans and policies should be submitted to the IHEDA Grants Manager or Compliance Analyst for review. Approved plan and policy should be maintained on file and may be requested during IHEDA or HUD Monitoring.

Costs should be reasonable and in proportion to volunteer time. Reasonable incentives can include:

- Providing a \$25 or \$50 gift card weekly for volunteers who work on a regular basis, depending on number of hours.
- A one-time \$10 card for a volunteer who works one day or a few hours.
- Luncheon for all volunteers
- Agency T-shirts, mugs or other small gifts

The above list includes possible examples of appropriate volunteer incentives; however, IHEDA will review all plans and subrecipients are not limited to the examples listed here.

Appendix G: IHCD Hazard Pay Guidance

As permitted by the CARES Act and Notice CPD-21-08, ESG-CV funds may be used for hazard pay when recipient- or subrecipient-staff work directly to prevent, prepare for, and respond to coronavirus among persons who are homeless or at risk of homelessness and document the nature of the work provided to substantiate this claim. Examples of recipient or subrecipient staff working directly in support of coronavirus response include emergency shelter intake staff, street outreach teams, emergency shelter maintenance staff, emergency shelter security staff, staff providing essential services (e.g., outpatient health or mental health, housing navigators), and staff in proximity to persons with coronavirus or working in locations with a high likelihood of contracting coronavirus. (Notice III.E.3.d).

In terms of how to track staff time, the exact methodology for tracking the time that staff worked on federal grants, and on components and activities within a federal grant, is at the discretion of the recipient. However, recipients and subrecipients must be able to sufficiently document the actual time charged to federal grants and the methodology used, which must be reasonable and justifiable. Timesheets that capture actual time spent on specific programs are the most straightforward way to meet time reporting requirements. However, other approaches may be acceptable as long as they meet the guidelines established in the [OMB OmniCircular, at 2 CFR part 200](#), as applicable. In this case, timesheets indicating temporary pay increases that correspond with a period during which staff work directly to prevent, prepare for, and respond to coronavirus could be one method of documenting hazard pay.

Staff and overhead costs directly related to carrying out ESG-CV activities, including hazard pay and one-time bonuses, eligible under Sections 576.101 through 576.107, are eligible costs as part of those activities and are allowable if all of the following criteria are met:

1. They are provided under your organization's established written compensation policies;
2. The costs are equitably allocated to all related activities, including Federal awards; and,
3. The accounting basis (cash or accrual) selected for costing each type of compensation is consistently followed by the subrecipient/subrecipient or specified grouping of employees.

Generally speaking, if a staff cost is eligible as an ESG Program cost, then the cost can be charged to the grant, as long as the organization's compensation policies are consistent with the cost principles established by the Office of Management and Budget for federal grant awards. Please note that this may include costs for overtime or hazard pay that are incurred by an ESG recipient or subrecipient to prevent, prepare for, and respond to coronavirus that are incurred prior to the date that organization's established written compensation policies were revised to allow for these costs. These cost principles help organizations determine the costs for specific activities and the costs that are chargeable to grants, contracts, and other agreements. These cost principles are outlined at 2 CFR 200 Sub-Part E. Key cost principles governing staff compensation are outlined at 2 CFR 200.430 and 200.431. For additional guidance on employee compensation and other overhead costs eligible under the ESG program, you should review FAQ #1838.

Appendix H: ESG-CV FAQs

Can furniture purchases be used to buy furniture for community spaces or apartment-style shelter during the shelter stay?

Yes, this is an allowable expense under normal ESG regulations.

What clients are eligible for temporary furniture?

Clients participating in RRH are eligible for this assistance so long as providing this assistance leads to housing stability. ESG-CV assistance must be in accordance with preventing, preparing for, and responding to COVID-19.

Can we use these funds to replace damaged laundry service machines in shelter?

Yes

Since Shelter was extended can we use more funding in Hazard Pay to help with staffing shortages?

Yes, this activity would be available.

Do we need to get approval to extend rental assistance from 12 month to 24 months to proceed?

For both RRH and HUB projects, you will still need to do recertifications every six months. For HUB subrecipients, you will need to complete the form and send it to the community services inbox (communityservices@ihcda.in.gov) for approval. For those received at the 12-month mark, the approval will be for 18-months. You will then need to complete the process again in order to have it extended to 24-months. RRH subrecipients will recertify clients internally (i.e. they will not send recertification requests to IHCD), but all clients must be recertified at each 6-month mark to be eligible for continued assistance.

Will we be able to just re-enroll the previous HUB clients and begin paying the current month and then the remaining months?

If you are continuing assistance and there is no gap between assistance, you can re-certify HUB clients to make sure they are income-eligible at each 6-month interval. If there has been a lapse in assistance because the client had already reached the 12-month cap prior to the new HUD guidance, you could treat it as a continuation of their previous assistance so long as you can demonstrate and document the household still needs/needed the assistance. **As of 1/1/22, it is determined the lapse in assistance cannot exceed 60 days—if a client has not received assistance from the HUB within the last 60 days, they cannot be recertified for continued assistance under ESG-CV HP rental assistance and will need to be exited from the program. Clients in this situation may be eligible for rapid rehousing or other assistance or may be referred to the ERA program operating in their area.**

Some specific issues would have to be dealt with on a case-by-case basis, and may be able to be resolved with the landlord if they know an additional 12 months of assistance will be paid for the tenant. Regarding late fees for non-payment, if it's a continuation, late fees cannot be paid for using ESG-CV program funds; however, you may want to ask the landlord if they will forgive the late fees if the program catches the client up on recently accrued rent payments and will continue to make payments for the coming months. IHCD staff will incorporate any additional specifics into our policies and procedures, which will ensure consistency during monitoring. If HUD issues guidance on this, we then

just adjust our policies and procedures to match at the time guidance is issued. Any clients prior to the updated guidance would fall under current policies and procedures.

If the clients have moved, are they still eligible for rental assistance?

Typically, if you have been providing rental assistance in order to maintain their residence, they would not be eligible for rental assistance if they move out. They could be eligible for HP relocation services through RRH awards but not with the HUB Rental Assistance Program.

If a client moved to the IERA program for assistance, can they switch back to ESG-CV?

It is important for HUBs to provide as much homelessness prevention assistance as allowed through ESG-CV. However, we are aware that some clients have already switched to IERA assistance. If a client has already begun receiving payments from the IERA program, they cannot switch back to ESG-CV. If they have recently applied but have not been approved and/or received payments from the IERA program, they may be able to continue to receive ESG-CV funds and withdraw from the IERA program. Please reach out to the IHCD Community Services Grants Team to discuss options and to ensure no duplication of benefits occurs.

Do I need approval for my specific project before moving forward?

No, if you have been awarded funding, if the expenses are allowable under the funding, and if you have allocated those expenses to the correct categories, you may proceed with your project. If you need to make a budget modification, please reach out to the IHCD Community Services Grants Team.

Can we use rental services for furniture?

No, the HUD guidelines specifically say the purchase of furniture, so furniture rental is not allowable.

Since furniture must be returned once the client is no longer being assisted with ESG-CV funding, would the cleaning and refurbishing of the furniture be an eligible ESG-CV expense?

Yes

Can we use vaccine incentives for employees?

As the guidance currently exists there is no allowance for staff incentives for vaccines. If further guidance provides for staff vaccine incentives, we will provide an update.

Can I use ESG-CV for hotel/motel stays?

Yes, hotel/ motel stays are an eligible activity of the Shelter grant. It could also be allowable for existing clients being assisted with RRH or HP funds that needed to temporarily quarantine away from the rest of the household due to COVID.

Concerning laundry funds - can we use those to partner with a local laundromat for the homeless people we work with?

Organizations could partner with a local laundromat to provide this service. This would be eligible under the Outreach grant.

What is the procedure if an employee of the sub-recipient applies for rental assistance through the program?

When an employee of a subrecipient applies for rental assistance through the ESG-CV Homelessness Prevention rental assistance program, the subrecipient must contact IHCD and provide the application information. IHCD will then assign this application to another subrecipient for intake processing. This

Can we use funding to re-open quarantine shelters?

Temporary emergency shelters were not included with the substantial amendment; therefore, funding cannot be allocated to them at this time.

Appendix I: Grant Documents

1. Non-Collusion and Acceptance Form

Non-Collusion and Acceptance

The undersigned attests, subject to the penalties of perjury, that he/she is the Subrecipient, or that the undersigned is the properly authorized representative, agent, member or officer of the Subrecipient. Further, to the undersigned's knowledge, neither the undersigned nor has any other member, employee, representative, agent or officer of the Subrecipient, directly or indirectly, has entered into or been offered any sum of money or other consideration for the execution of this Agreement other than that which appears upon the face hereof. **Furthermore, if the undersigned has knowledge that a State officer, employee, or special State appointee, as those terms are defined in I.C. §4-2-6-1, has a financial interest in the Agreement, the Subrecipient attests to compliance with the disclosure requirements in I.C. §4-2-6-10.5.**

Agreement to Use Electronic Signatures

I agree, and it is my intent, to sign this Agreement by accessing the electronic signature tool in Adobe to electronically submit this Agreement to IHCDA. I understand that my signing and submitting this Agreement in this fashion is the legal equivalent of having placed my handwritten signature on the submitted Agreement and this affirmation. I understand and agree that by electronically signing and submitting this Agreement in this fashion I am affirming to the truth of the information contained therein and my authority to bind the Subrecipient. I also understand that if I decide not to sign this Agreement electronically, I must notify IHCDA so that this Agreement may be re-submitted to me and I may sign it and return it to IHCDA in the traditional manner.

In Witness whereof, the Subrecipient and the IHCDA have, through duly authorized representatives, entered into this Agreement. The parties, having read and understand the foregoing terms of this Agreement, do by their respective signatures dated below hereby agree to the terms thereof.

«Agency»

(Where Applicable)

By: _____

Attested By: _____

Printed Name: _____

Title: _____

Date: _____

Indiana Housing and Community Development Authority:

By: _____

Printed Name: J. Jacob Sipe

Title: Executive Director

Date: _____

CFDA #14.231

2. Exhibit A: Additional Programmatic, Statutory, and Regulatory Requirements (Sample)

EXHIBIT A ADDITIONAL PROGRAMMATIC, STATUTORY AND REGULATORY REQUIREMENTS

Award Number: «Award_Number»
Subrecipient: «Agency»
Funding Source/Activity Type: Emergency Solutions Grant CARES

The Subrecipient is bound by the contents of the Subrecipient’s Proposal submitted to IHCDA, this Agreement, ESG-O CARES Program Memos, the RFP, the ESG-O CARES Award Manual, and any other IHCDA policy, directives or memoranda that may be published from time to time.

1. **Agreement Execution:**

The Subrecipient must execute and return this Agreement to IHCDA no later than **[date]**.

2. **Waiver of Requirements due to Coronavirus Disease 2019 (COVID-19)**

Notwithstanding any other provisions in this Agreement, due to COVID-19, waivers of certain requirements under this Agreement may be made available by HUD and IHCDA. If the Subrecipient chooses to utilize any such waiver and notifies IHCDA, the Subrecipient may use any such waiver and must comply with any procedures required, use the waiver within its applicable timeline, and comply with any alternative requirements set forth by HUD and IHCDA. Subrecipient must maintain documentation showing its compliance with the procedures and alternative requirements.

3. **Claims:**

The Subrecipient must submit any claims for eligible expenses within **sixty (60) days** after the calendar month in which the expenses are incurred or paid by the Subrecipient or IHCDA may deny payment. Claims Vouchers must be submitted online through the IHCDA Online Management System as described in the Award Manual. Supporting documentation for claims must be submitted through this system.

4. **Eligible Expenses:**

- A. **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.

B. **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 24 CFR 576.400(d); conducting the initial evaluation required under 24 CFR 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.

C. **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-O CARES 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.

D. **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-O CARES 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.

E. **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 subrecipient 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 subrecipient staff to accompany or assist program participants to use public transportation.

- F. **Services for special populations.** ESG-O CARES 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 section 24 CFR 576.101. 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.

Subject to the cost principles in 2 CFR 200, employee compensation and other overhead costs directly related to carrying out street outreach are eligible costs of those program components.

5. Homeless Management Information Systems:

The Subrecipient must ensure that data on all persons served and all activities assisted under ESG-O CARES are entered into the Homeless Management Information System (“HMIS”) in accordance with HUD's standards on participation, data collection, and reporting requirements. The Subrecipient is required to enter data into the HMIS on a regular and consistent basis. “Regular and consistent” means within a five (5) business day period of intake or discharge. Data must be entered for the ESG-O CARES funded shelter program and all other residential programs serving homeless individuals and families. The data required for entry into HMIS includes 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. The Subrecipient agrees to collect any other data elements as required by HUD as it updates its HMIS data standards, from time to time. The Subrecipient is required to update a client’s status annually. These updates should be completed at intake and discharge and at client’s annual recertification. The Subrecipient must comply with all privacy and security requirements set forth in IHCD’s HMIS Agency Participation Agreement. If the Subrecipient is a victim service provider, the Subrecipient must not enter data into the HMIS but must enter data into a comparable database as described below.

6. Victim Service Providers:

If Subrecipient is a victim service provider it must enter client-level data on ESG-O CARES 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 IHCD’s ClientTrack database. The data required for entry into IHCD’s 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. The Subrecipient agrees to collect any other data elements as required by HUD as it updates its HMIS data standards, from time to time. The Subrecipient is required to update a client’s status annually. These updates should be completed at intake and discharge and at client’s annual recertification. Any comparable database being used by Subrecipient must be able to produce a HUD compliant APR, which requires .csv files. If the Subrecipient’s comparable database cannot produce a HUD compliant APR, it must use IHCD’s ClientTrack database.

7. Obtaining the Client's Consent:

If the Subrecipient is a Victim Service Provider, it must obtain consent from each client for collection and entry of each client's personally identifying information into IHCDA's ClientTrack database or the Subrecipient's comparable database. If at the time of collection, a client withdraws or revokes consent for providing personally identifying information, the Subrecipient is responsible for immediately making appropriate data entries into ClientTrack or its comparable database, as applicable. The Subrecipient must comply with all privacy and security requirements set forth in IHCDA's Participation Agreement for Victim Service Providers.

8. Coordinated Entry:

Subrecipient must use the coordinated entry system established by the Continuum of Care as set forth in 24 CFR 578.7(a)(8) and in a manner consistent with Indiana Balance of State Coordinated Entry policies and procedures.

9. Statewide Point-in-Time Homeless Count:

The Subrecipient is required to participate in the Statewide Point-in-Time counts in collaboration with its regional Continuum of Care by submitting appropriate data upon request.

10. Local Unit of Government Approval:

Pursuant to 42 U.S.C. 11373(c), if the Subrecipient is a nonprofit organization, the Subrecipient must submit a written certification of approval from its local governmental body to enter into this agreement. Further, the Subrecipient must be exempt from taxation under Section 501 (c) of Title 26 of the United States Code (Internal Revenue Code), have an appropriate accounting system, have a voluntary board of directors, and practice non-discrimination in the provision of assistance.

11. Maintenance of Effort:

If the Subrecipient is a unit of general purpose local government, its ESG-O CARES funds cannot be used to replace funds the local government provided for street outreach and emergency shelter services during the immediately preceding 12-month period, unless HUD determines that the unit of general purpose local government is in a severe financial deficit.

12. Violence Against Women Reauthorization Act of 2013 ("VAWA"):

No individual or family may be denied admission to or removed from the emergency shelter on the basis or as a direct result of the fact that the individual or family is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, if the individual or family otherwise qualifies for admission or occupancy.

13. Supportive Services:

The Subrecipient must assist program participants in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local and private assistance available to assist the program participant in obtaining housing stability, including:

- a. Medicaid (42 CFR chapter IV, subchapter C);
- b. Supplemental Nutrition Assistance Program (7 CFR parts 271–283);
- c. Women, Infants and Children (WIC) (7 CFR part 246);
- d. Federal-State Unemployment Insurance Program (20 CFR parts 601–603, 606, 609, 614–617, 625, 640, 650);
- e. Social Security Disability Insurance (SSDI) (20 CFR part 404);
- f. Supplemental Security Income (SSI) (20 CFR part 416);
- g. Child and Adult Care Food Program (42 U.S.C. 1766(t) (7 CFR part 226));
- h. Other assistance available under the programs listed in 24 CFR 576.400(c).

14. Participation of Homeless/Formerly Homeless Individuals:

To the maximum extent practicable, the Subrecipient must involve homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted with 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.

15. Match:

Pursuant to the CARES Act, ESG-O CARES funds are exempt from ESG match requirements, including 24 CFR 576.201.

16. ESG Progress and Closeout Reports:

The Subrecipient must submit the ESG Progress and Closeout reports to IHCDA.

17. Confidentiality:

A. The Subrecipient must develop and implement written procedures to ensure:

(i) All records containing personally identifying information (as defined in HUD's standards for participation, data collection, and reporting in a local HMIS) of any individual or family who applies for and/or receives ESG-O CARES assistance will be kept secure and confidential;

(ii) The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under the ESG-O CARES will not be made public, except with written authorization of the person responsible for the operation of the shelter; and

(iii) The address or location of any housing of a program participant will not be made public, except as provided under a preexisting privacy policy of the subrecipient and consistent with state and local laws regarding privacy and obligations of confidentiality.

B. The confidentiality procedures of the Subrecipient must be in writing and must be maintained in accordance with this section.

18. Insurance:

Subrecipient shall secure and keep in force during the term of this Agreement, appropriate liability insurance coverage relative hereto, with minimum liability of \$500,000 per person and \$1,000,000 per occurrence for bodily injury and property damage. If Subrecipient is a department or division of the State of Indiana, or of a county, municipal, or local government, the foregoing insurance coverage shall not be

required; however, Subrecipient may elect to provide such coverage. As required by law, Subrecipient shall secure and keep in force Workers' Compensation and Unemployment Compensation Insurance. Upon request, Subrecipient must provide IHCD with proof of such insurance coverage by submitting certificates of insurance illustrating the types of coverage, limits of liability, and expiration dates of the policies.

19. Evaluation of Program Participant's Eligibility and Needs:

The Subrecipient must conduct an initial evaluation to determine the eligibility of each individual or family's eligibility for ESG-O CARES assistance and the amount and types of assistance the individual or family needs to gain stability in permanent housing. These evaluations must be conducted in accordance with the centralized or coordinated assessment requirements set forth under 24 CFR 576.400(d) and the written standards established under 24 CFR 576.400(e).

Notwithstanding any contrary requirements under McKinney-Vento Homeless Assistance Act, 24 CFR part 576, or this Agreement, youth aged 24 and under who seek assistance shall not be required to provide third-party documentation that they meet the homeless definition in 24 CFR 578.3 as a condition for receiving assistance; and unaccompanied youth aged 24 and under (or families headed by youth aged 24 and under) who have an unsafe primary nighttime residence and no safe alternative to that residence shall be considered homeless for purposes of assistance provided by any private nonprofit organization whose primary mission is to provide services to youth aged 24 and under and families headed by youth aged 24 and under.

20. Fees:

The Subrecipient and its subcontractors may impose fees upon the recipients of services only if such fees are reasonable (not to exceed thirty (30%) of the recipient's adjusted gross income) and such fees are used only for eligible costs associated with the ESG-O CARES Program. Any fees collected by the Subrecipient must be approved by IHCD and will be considered program income. Costs paid using program income shall count toward the Subrecipient's matching/non-federal share requirement provided the costs are eligible ESG-O CARES costs that supplement the Subrecipient's ESG-O CARES Project.

21. Occupancy Agreements and Leases:

The Subrecipient must not require occupants of emergency shelter to sign leases or occupancy agreements unless a shelter received funds under a FY 2010 Emergency Shelter Grant and met the criteria under the former emergency shelter definition ("any facility, the primary purpose of which is to provide temporary or transitional shelter for the homeless in general or for specific populations of the homeless").

22. Affirmative Outreach:

The Subrecipient must make known that use of the facilities, assistance, and services are available to all on a nondiscriminatory basis. If it is unlikely that the procedures that the recipient or Subrecipient intends to use to make known the availability of the facilities, assistance, and services will reach persons of any particular race, color, religion, sex, age, national origin, familial status, or disability who may qualify for those facilities and services, the Subrecipient must establish additional procedures that ensure that those persons are made aware of the facilities, assistance, and services. The Subrecipient must take appropriate steps to ensure effective communication with persons with disabilities including, but not limited to, adopting procedures that will make available to interested persons information concerning the location of assistance, services, and facilities that are accessible to persons with disabilities. Consistent with Title VI and Executive Order 13166, Subrecipient is also required to take reasonable steps to ensure meaningful access to programs and activities for limited English proficiency (LEP) persons.

23. Meaningful Access to the ESG-O CARES Program for Limited English Proficient Persons:

Persons who, as a result of national origin, do not speak English as their primary language and who have limited ability to speak, read, write, or understand English (“limited English proficient persons” or “LEP”) may be entitled to language assistance under Title VI in order to receive a particular service, benefit, or encounter. In accordance with Title VI of the Civil Rights Act of 1964 (Title VI) and its implementing regulations, the Subrecipient 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.

24. Debarment and Suspension:

The Subrecipient certifies, by entering into this Agreement, that neither it nor its principals are presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from entering into this Agreement by any Federal department or agency or any agency or political subdivision of the State of Indiana. The term “principal” for purposes of this Agreement is defined as an officer, director, owner, partner, key employee, or other person with primary management or supervisory responsibilities, or a person who has a critical influence on or substantive control over the operations of the Subrecipient.

25. Terminating Assistance:

If a program participant violates program requirements, the Subrecipient may terminate the assistance in accordance with a formal process established by the Subrecipient that recognizes the rights of individuals affected. The Subrecipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases. Termination under this section does not bar the Subrecipient from providing further assistance at a later date to the same family or individual.

26. Prohibition Against Involuntary Family Separation:

The age, of a child under age 18 must not be used as a basis for denying any family's admission to an emergency shelter that uses ESG-O CARES funding or services and provides shelter to families with children under age 18.

27. Area-Wide Systems Coordination Requirements:

- A. Consultation with Continuums of Care. The Subrecipient must consult with each Continuum of Care that serves the Subrecipient's jurisdiction in determining how to allocate ESG-O CARES funds each program year; developing the performance standards for, and evaluating the outcomes of, projects and activities assisted by ESG-O CARES funds; and developing funding, policies, and procedures for the administration and operation of the HMIS.
- B. Coordination with other targeted homeless services. The Subrecipients must coordinate and integrate, to the maximum extent practicable, ESG-O CARES-funded activities with other programs targeted to homeless people in the area covered by the Continuum of Care or area over which the services are coordinated to provide a strategic, community-wide system to prevent and end homelessness for that area.

- C. System and program coordination with mainstream resources. The Subrecipients must coordinate and integrate, to the maximum extent practicable, ESG-O CARES-funded activities with mainstream housing, health, social services, employment, education, and youth programs for which families and individuals at risk of homelessness and homeless individuals and families may be eligible.

28. Lead-Based Paint Remediation and Disclosure:

The Lead-Based Paint Poisoning Prevention Act ([42 U.S.C. 4821](#)–4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 ([42 U.S.C. 4851](#)–4856), and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M, and R apply to all shelters assisted under the ESG-O CARES program and all housing occupied by program participants.

29. Recordkeeping and Reporting Requirements:

The Subrecipient must maintain documentation in accordance with 24 CFR 576.500. The Subrecipient must have policies and procedures to ensure the requirements of 24 CFR 576 are met including those required by 2 CFR part 200. The policies and procedures must be established in writing and implemented by the recipient and its subrecipients to ensure that ESG-O CARES funds are used in accordance with the requirements. In addition, sufficient records must be established and maintained to enable IHCA and HUD to verify the following, as applicable: (1) homeless status; or (2) at risk of homelessness status; (3) determinations of ineligibility; (4) annual income calculations; (5) program participant records; (6) written intake procedures for the centralized or coordinated assessment system(s) developed by the Continuum of Care(s) (“COC”); (7) rental assistance agreements and payments; (8) Utility allowance, if applicable; (9) shelter and housing property standards in 24 CFR 576.403; (10) the type and amount of services and assistance provided to shelters; (11) types and amounts of services and assistance provided to participants; (12) consultation and coordination with the Continuum of Care(s) in accordance with 24 CFR 576.400 and Subrecipient’s integration of ESG-O CARES assistance with programs targeted toward homeless people and mainstream service and assistance programs; (13) HMIS participation; (14) Matching contributions; (15) compliance with conflicts-of-interest regulations Subrecipient’s integration of ESG-O CARES assistance with programs targeted toward homeless people and mainstream service and assistance programs; (16) Homeless participation in accordance with 24 CFR 576.405; (17) compliance with faith-based activity requirements under 24 CFR 576.406; (18) records demonstrating compliance with nondiscrimination and equal opportunity requirements in accordance with 24 CFR 576.407(a) and 24 CFR 576.407(b); (19) compliance with Uniform administrative requirements in 2 CFR 200; (20) compliance with environmental review and flood insurance requirements; (21) certifications and disclosure forms required under the lobbying and disclosure requirements in 24 CFR 87; (22) compliance with the displacement, relocation, and acquisition requirements in 24 CFR 576.408; (23) supporting documentation demonstrating that all costs were incurred for eligible ESG-O CARES activities and records regarding program income; (24) copies of procurement contracts and compliance with Federal procurement requirements; (25) other records requested by HUD; and (26) compliance with confidentiality procedures.

30. Equal Access in Accordance with Gender Identity:

- A. The admissions, occupancy, and operating policies and procedures of the Subrecipient, including policies and procedures to protect privacy, health, safety, and security, shall be administered in a nondiscriminatory manner to ensure that:
- (1) Equal access to ESG-O CARES programs, shelters, other buildings and facilities, benefits, services, and accommodations is provided to an individual in accordance with the individual's gender identity, and in a manner that affords equal access to the individual's family;
 - (2) An individual is placed, served, and accommodated in accordance with the gender identity of the individual;

- (3) An individual is not subjected to intrusive questioning or asked to provide anatomical information or documentary, physical, or medical evidence of the individual's gender identity; and
 - (4) Eligibility determinations are made and assisted housing is made available in ESG-O CARES programs as required by 24 CFR §5.105(a)(2).
- B. Placement and accommodation of an individual in temporary, emergency shelters and other buildings and facilities with physical limitations or configurations that require and are permitted to have shared sleeping quarters or shared bathing facilities shall be made in accordance with the individual's gender identity.
 - C. Post-admission accommodations. The Subrecipient must ensure that nondiscriminatory steps that may be necessary and appropriate to address privacy concerns raised by residents or occupants are taken and, as needed, ensure that admissions, occupancy, and operating policies and procedures are updated in accordance with paragraph A of this section.
 - D. Subrecipient shall document and maintain records of compliance with the requirements in paragraph A of this section for a period of five (5) years.

31. HUD Guidance for Single-Sex Emergency Shelters or Other Facilities that Receive ESG, HOPWA, or CoC Funds

A. Assignments

HUD assumes that a recipient or subrecipient (“provider”) that makes decisions about eligibility for or placement into single-sex emergency shelters or other facilities will place a potential client (or current client seeking a new assignment) in a shelter or facility that corresponds to the gender with which the person identifies, taking health and safety concerns into consideration. A client’s or potential client’s own views with respect to personal health and safety should be given serious consideration in making the placement. For instance, if the potential client requests to be placed based on his or her sex assigned at birth, HUD assumes that the provider will place the individual in accordance with that request, consistent with health, safety, and privacy concerns. HUD assumes that a provider will not make an assignment or re-assignment based on complaints of another person when the sole stated basis of the complaint is a client or potential client’s non-conformance with gender stereotypes.

B. Appropriate and Inappropriate Inquiries Related to Sex

For temporary, emergency shelters with shared sleeping areas or bathrooms, the Equal Access Rule permits shelter providers to ask potential clients and current clients seeking a new assignment their sex. Best practices suggest that where the provider is uncertain of the client’s sex or gender identity, the provider simply informs the client or potential client that the agency provides shelter based on the gender with which the individual identifies. There generally is no legitimate reason in this context for the provider to request documentation of a person’s sex in order to determine appropriate placement, nor should the provider have any basis to deny access to a single-sex emergency shelter or facility solely because the provider possesses identity documents indicating a sex different than the gender with which the client or potential client identifies. The provider may not ask questions or otherwise seek information or documentation concerning the person’s anatomy or medical history. Nor may the provider consider the client or potential client ineligible for an emergency shelter or other facility because his or her appearance or behavior does not conform to gender stereotypes.

C. Privacy

If a client expresses safety or privacy concerns, or if the provider otherwise becomes aware of privacy or safety concerns, the provider must take reasonable steps to address those concerns. This may include, for example: responding to the requests of the client expressing concern through the addition of a privacy partition or curtain; provision to use a nearby private restroom or office; or a separate changing schedule. The provider must, at a minimum, permit any clients expressing concern to use bathrooms and dressing areas at a separate time from others in the facility. The provider should, to the extent feasible, work with the layout of the facility to provide for privacy in bathrooms and dressing areas. For example, toilet stalls should have doors and locks and there should be separate showers stalls to allow for privacy. Note: ESG and HOPWA funds may be used to renovate an emergency shelter to maximize privacy and safety. The provider should ensure that its policies do not isolate or segregate clients based upon gender identity.

D. Training

It is the responsibility of the Subrecipient to comply with the Equal Access Rule. In furtherance of such, the Subrecipient should provide this Notice to staff members and contractors so as to ensure that employees and contractors who interact directly with potential clients and current clients are aware of it and take prompt corrective action to address noncompliance. Moreover, they should provide training to staff on completing intakes consistent with this guidance. If HUD finds a recipient or subrecipient has failed to meet program requirements, HUD may take actions such as those described in 24 CFR 40 576.501 or 24 CFR 574.540.

E. Further information

In addition to complying with the requirements of the Equal Access Rule as described above, recipients and subrecipients must comply with all of HUD's nondiscrimination and equal opportunity provisions at 24 CFR 5.105.

32. Summary of Other Federal Regulations:

The Subrecipient agrees to comply with applicable provisions of the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821 et. seq), and implementing regulations at 24 CFR Part 35, subparts A, B, H, J, K, M, and R. The Subrecipient further agrees to comply with 24 CFR 576.59 and the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (42 U.S.C. 4601 et. seq), as applicable. The Subrecipient must comply with the policies, guidelines and requirements of 2 CFR 200, except that program income is to be used as match or non-federal share. The requirements in 24 CFR part 5, subpart A are applicable, including the nondiscrimination and equal opportunity requirements at 24 CFR 5.105(a). Section 3 of the Housing and Urban Development Act of 1968, 12 U.S.C. 1701u, and implementing regulations at 24 CFR part 135 apply, except that homeless individuals have priority over other Section 3 residents in accordance with 24 CFR 576.405(c).

33. OMB Requirements.

- A. **Applicability of Uniform Administrative Requirements.** The Subrecipient shall comply with 2 CFR 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.
- B. **Indirect Cost Rate.** According to 2 CFR 200.414(f), the Subrecipient may charge a de minimis rate of 10% of modified total direct costs (MTDC). As described in 2 CFR 200.403, Factors affecting allowability of costs, costs must be consistently charged as either indirect or direct

costs, but may not be double charged or inconsistently charged as both. If chosen, this methodology once elected must be used consistently for all Federal awards until such time as the Subrecipient chooses to negotiate a rate, which the Subrecipient may apply to do at any time.

A proposal to establish a cost allocation plan or an indirect (F&A) cost rate, whether submitted to a Federal cognizant agency for indirect costs or maintained on file by the Subrecipient, must be certified by the Subrecipient using the Certificate of Cost Allocation Plan or Certificate of Indirect Costs as set forth in Appendices III through VII, and Appendix IX in 2 CFR part 200. The certificate must be signed on behalf of the Subrecipient by an individual at a level no lower than vice president or chief financial officer of the Subrecipient.

C. Internal Controls. The Subrecipient must:

1. Establish and maintain effective internal control over federal funds that provides reasonable assurance that the Subrecipient 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 Subrecipient’s 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 IHCD or HUD designates as sensitive or the Subrecipient considers sensitive consistent with applicable Federal, state, local, and tribal laws regarding privacy and obligations of confidentiality.

D. Conflict of Interest Disclosure. The Subrecipient must disclose in writing any potential conflict of interest to IHCD.

E. Mandatory Disclosure. The Subrecipient must disclose, in a timely manner, in writing to IHCD all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Award. The Subrecipient’s failure to make these disclosures may subject to the Subrecipient to remedies of non-compliance set forth in 2 CFR 200.338.

If the total value of the Subrecipient’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 Subrecipient 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.

F. Closeout.

1. The Subrecipient must submit, no later than fifteen (15) days after the Expiration Date, all financial, performance information and other information as required by the terms and conditions this Agreement.
2. The closeout of a Federal award does not affect any of the following:
 - a. The right of IHCDA to disallow costs and recover funds on the basis of a later audit or other review.
 - b. The obligation of the Subrecipient to return any funds due as a result of later refunds, corrections, or other transactions including final indirect cost rate adjustments.
 - c. Audit requirements in subpart F of 2 CFR part 200.
 - d. Recordkeeping and record retention requirements set forth herein.

34. Lobbying Activities.

Pursuant to 5 U.S.C. § 1502, 31 U.S.C. § 1352, 24 CFR 87.110 (and any applicable successor sections), and any regulations promulgated thereunder, the Sub-recipient hereby certifies that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the Subrecipient, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the Subrecipient's receipt of any Federal contract, any Federal grant, or entering into of any cooperative agreement exceeding \$100,000, or its receipt of any Federal loan or loan guarantee exceeding \$150,000 and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, loan guarantee or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the Sub-recipient shall complete and submit Standard Form-LLL, "Disclosure of Lobbying Activities," in accordance with its instructions.

(3) The Sub-recipient shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all tiers (sub-recipients, sub-subrecipients, contractors, sub-contractors, etc) shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person or entity, who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

35. Cares Act Reporting Requirements:

A. Report Regarding Activities Undertaken:

The Subrecipient must submit a report on the activities undertaken with ESG-HP CARES funding including the number of individuals assisted and the types of assistance provided. This information will be reported on the ESG-HP CARES Consolidated Annual Performance and Evaluation Report and submitted to IHCDA. The reporting format and requirements are subject to change based on further guidance from HUD and IHCDA.

B. Additional CARES ACT Reporting:

In order to comply with Section 15011 of the CARES Act, the Subrecipient must submit at the end of each quarter, a report containing information regarding; the amount of funds obligated or expended for each project or activity; a detailed list of all such projects or activities, including a description of the project or activity; and detailed information on any subcontracts or subgrants awarded by the Subrecipient.

36. Duplication of Benefits:

- A. Section 312 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. 5155), prohibits the duplication of benefits for programs that provide financial assistance to people or entities suffering losses as a result of a Federally-declared disaster or emergency.
- B. The duplication of benefits occurs when Federal financial assistance is provided to a person or entity through a program to address losses resulting from a Federally-declared emergency or disaster, and the person or entity has received (or would receive, by acting reasonably to obtain available assistance) financial assistance for the same costs from any other source (including insurance), and the total amount received exceeds the total need for those costs.
- C. The Subrecipient shall ensure that that each beneficiary receiving assistance executes a Duplication of Benefits Affidavit (“Affidavit”) the certification contained in Appendix A (attached hereto and fully incorporated herein). This certification must be maintained in the Subrecipient’s client files.

37. Additional Guidance:

The Subrecipient understands that due to the nature of this funding, HUD may enact additional guidance or requirements related to ESG-HP CARES funds after the execution of this Agreement. Depending on the nature of the guidance, updates may be provided to the Subrecipient in the form of a notice or the Subrecipient may be required to execute an amendment to this Agreement. The Subrecipient hereby agrees to comply with any such guidance enacted by HUD and execute an amendment to this Agreement, if required.

38. Activities to Prevent, Prepare for, and Respond to Coronavirus:

“Prevent, prepare for, and respond to coronavirus” means the following:

- A. “Prevent ...coronavirus” means an activity designed to prevent the initial or further spread of the virus to people experiencing homelessness, people at risk of homelessness, Subrecipient staff, or other shelter or housing residents. This includes providing Personal Protective Equipment to staff and program participants, paying for non-congregate shelter options such as hotels and motels, paying for handwashing stations and portable toilets for use by people

living in unsheltered situations, and providing homelessness prevention assistance to individuals and families who are homeless or at risk of homelessness (as applicable) to reduce their risk of contracting or further spreading the virus.

- B. “Prepare for ...coronavirus” means an activity carried out by Subrecipient prior to or during a coronavirus outbreak in their jurisdiction to plan to keep people healthy and reduce the risk of exposure to coronavirus and avoid or slow the spread of disease. This includes updating written standards to prioritize people at severe risk of contracting coronavirus for shelter and housing consistent with fair housing and nondiscrimination requirements, adapting coordinated entry policies and procedures to account for social distancing measures or increased demand, developing a strategy and recruiting landlords to provide housing to people experiencing homelessness or at risk of homelessness, training homeless providers on infectious disease prevention and mitigation, and implementing a non-congregate shelter strategy to reduce the spread of coronavirus.
- C. “Respond to coronavirus” means an activity carried out once coronavirus has spread to people experiencing homelessness, provider staff, or once individuals and families lose or are at risk of losing their housing as a result of the economic downturn caused by coronavirus. This includes transporting individuals and families experiencing homelessness to medical appointments, paying for shelter to isolate individuals who have contracted coronavirus from other program participants and people experiencing homelessness, providing rental assistance to those who are at risk of losing their housing, have already become homeless, or continue to experience homelessness due to the, economic downturn caused by coronavirus, and providing hazard pay to Subrecipient staff who put their own health at risk to continue to provide necessary services to individuals and families experiencing and risk of homelessness.

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3. Exhibit B: Budget Agreement (Sample)

EXHIBIT B EMERGENCY SOLUTIONS GRANT OUTREACH PROGRAM AGREEMENT BUDGET
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Subrecipient: «Agency»

Agreement Number: «Award_Number»

	BUDGET CATEGORY	ESG-O CARES AMOUNT
	Street Outreach	\$«Award_Amount»

In accordance with Paragraph 8 of this Agreement, the IHCDA will allow only three (3) budget modifications per fiscal year.

All costs must be to prevent, prepare for, and respond to coronavirus, among individuals and families who are homeless or receiving homeless assistance and to support additional homelessness assistance activities to mitigate the impacts created by coronavirus under the Emergency Solutions Grants program. Funds may be used for costs incurred prior to the start date of this Agreement and the Federal Award Date provided that the costs are otherwise allowable and were incurred to prevent, prepare for, and respond to coronavirus.

4. Appendix A: Certification of Local Approval for Non-Profit Organizations
EMERGENCY SOLUTIONS GRANT OUTREACH PROGRAM

**CERTIFICATION OF LOCAL APPROVAL
FOR NONPROFIT ORGANIZATIONS**

I,

Name and Title (local elected official or chief executive officer of local unit of government)
duly authorized to act on behalf of the:

Name of the Jurisdiction

Hereby approve the following project(s) proposed by:

Name of Nonprofit

Which is (are) to be located in:

Name of Jurisdiction

Street Outreach Program:

--

By:

Printed Name and Title

Signature

Date

5. Appendix A: Duplication of Benefits Affidavit

Duplication of Benefits Affidavit (“Affidavit”)

I/We, _____ affirm the following:

1. I/We is/are executing this Affidavit in connection with assistance that we are receiving to help us prevent, prepare for, or respond to the coronavirus by providing us with _____ (“**Type of Assistance**”) for the purpose of _____ (“**Need**”) in the amount of _____ (“**Amount of Assistance or Total Need**”) from _____ (“**Organization**”) through a program administered by the Indiana Housing and Community Development Authority (“IHCDA”) with funding from the U.S. Department of Housing and Urban Development (the “Program”).
2. The Organization and I/We believe my **Amount of Assistance/Total Need** is _____
3. In addition, I/We have received or will receive the following amounts and types of assistance from the sources listed below (“Duplicative Assistance”):
 - a. Insurance (Flood Insurance, Homeowner’s, etc.) \$ _____
 - b. Federal Emergency Management Agency (FEMA) \$ _____
 - c. Small Business Administration (SBA) Loan \$ _____
 - d. The American Red Cross (Red Cross) \$ _____
 - e. The City \$ _____
 - f. Other agencies (besides IHCDA) \$ _____
4. Total Unmet Need (2- 3(a) + 3(b) + 3(c) + 3(d) + 3(e)) + 3(f) \$ _____
5. I/We have received no other assistance funds in the for the Need listed in Paragraph 1 other than that set forth above in paragraph 3.
6. 42 U.S.C. 5155(a) prohibits federal agencies from providing assistance to any person for “any part of such loss” as to which he has received financial assistance under any other program or from insurance or any other source (such as, FEMA, SBA, the Red Cross, the City, homeowner’s Insurance, etc.).
7. I/We understand that the amount of assistance received by I/We from IHCDA must be reduced by the amount of Duplicative Assistance received or will be received for the Need, from other sources (such as, FEMA, SBA, the Red Cross, the City homeowner’s insurance, etc.) for the same purpose.
8. Therefore, I/We understand that if I/We receive assistance from a source other than IHCDA (such as, FEMA, SBA, the Red Cross, the City, homeowner’s insurance, etc.) for the Need, I/We must repay the assistance received from IHCDA.

9. I/We certify under State and Federal penalties for perjury and fraud that the information provided above is true and accurate and acknowledge that repayment of all assistance received by Me/Us from IHCD, payment of fines and/or imprisonment may be required in the event that I/We provide false, incomplete or misleading information in this Affidavit or during the rest of this process.

Participant _____

Signature of Participant _____ Date _____

Participant _____

Signature of Participant _____ Date _____

6. ESG-CV Grant Close-Out Report

Organization Information	
Subrecipient Name:	
Report completed by:	
Phone Number:	
Date Submitted:	
Grant Information	
Project Type:	
IHCDA Award Number:	
Agreement/Report Period:	
Project Start Date:	
Project End Date:	
Total Award Amount:	

CLOSE OUT QUESTIONS:

1. All data has been entered into HMIS: Yes No
2. All claims have been submitted for payment: Yes No
3. Date of last submitted claim: _____
4. Project is completed: Yes No

By selecting Yes, the subrecipient is acknowledging that all claims have been submitted, that they will no longer need any remaining funding, that their ESG-CV project will be closed, and that IHCDA will reallocate any remaining funds to other subrecipients.

NARRATIVE QUESTIONS:

Please respond to the following questions:

1. How were these funds used to prevent, prepare for, or respond to the Covid-19 outbreak for individuals who are or might experience homelessness?
2. What were challenges associated with using these funds?
3. What were some success stories associated with using these funds? *Please make sure to keep anonymity when appropriate.*
4. What outcomes occurred because of these funds?

5. Please provide a description of the ESG-CV unique activities you utilize as part of this funding.
- Handwashing Stations & Portable Bathrooms (Street Outreach):
 - Hazard Pay:
 - Landlord Incentives (RRH):
 - Volunteer Incentives:
 - Training:
- The subrecipient did not utilize any unique activities.

SUMMARY OF AWARD EXPENDED

Please provide a summary of expenses below. You will also be required to report those expenses on the accompanying financial report.

Project Type	Budget Amount	Expended Amount	Remainder (Unused)
Homelessness Prevention			
Rapid Rehousing			
Emergency Shelter			
Street Outreach			
Other ESG-CV Expenditures			
TOTAL:			

ACKNOWLEDGEMENT

I certify that all identified activities undertaken by the Subrecipient with funds provided under the Award Agreement have, to the best of my knowledge, been completed in accordance with the Award Agreement; that the United States of America and the Indiana Housing and Community Development Authority (IHCDA) are under no obligation to make any further payment in any form to the Award Recipient under this Award Agreement; and that every statement and amount is set forth in the Close-Out Report is, to the best of my knowledge, true and correct as of this date. The Award Recipient hereby agrees that the Award Recipient will promptly remit any costs to the IHCDA under this ESG-CV award disallowed by a subsequent audit by the Indiana State Board of Accounts or other auditing bodies.

Signature, Chief Executive Officer

Date

Printed Name and Title, Chief Executive Officer

6. ESG-CV Subrecipient Close-Out Workbook

Indiana Housing and Community Development Authority											
ESG-CV Reporting											
NAME OF Subrecipient											
Name of ESG-CV Project(s):											
Final Report Date:											
Category	TOTAL	1st Qtr 1/1/20-9/30/20	2nd Qtr 10/1/20-12/31/20	3rd Qtr 1/1/21-3/31/21	4th Qtr 4/1/21-6/30/21	5th Qtr 7/1/21-9/30/21	6th Qtr 10/1/21-12/31/21	7th Qtr 1/1/22-3/31/22	8th Qtr 4/1/22-6/30/22	9th Qtr 7/1/22-9/1/22	Notes
Expenditures for Homelessness Prevention											
Rental Assistance	\$	-									
Relocation and Stabilization Services - Financial Assistance	\$	-									
Relocation and Stabilization Services - Services	\$	-									
Hazard Pay (unique activity)	\$	-									
Landlord Incentives (unique activity)	\$	-									
Volunteer Incentives (unique activity)	\$	-									
Training (unique activity)	\$	-									
Subtotal Homelessness Prevention	\$	-	\$	-	\$	-	\$	-	\$	-	\$
Expenditures for Rapid Rehousing											
Rental Housing	\$	-									
Relocation and Stabilization Services - Financial Assistance	\$	-									
Relocation and Stabilization Services - Services	\$	-									
Hazard Pay (unique activity)	\$	-									
Landlord Incentives (unique activity)	\$	-									
Volunteer Incentives (unique activity)	\$	-									
Training (unique activity)	\$	-									
Subtotal Rapid Rehousing	\$	-	\$	-	\$	-	\$	-	\$	-	\$
Expenditures for Emergency Shelter (Normal)											
Essential Services	\$	-									
Operations	\$	-									
Renovations	\$	-									
Major Rehab	\$	-									
Conversion	\$	-									
Hazard Pay (unique activity)	\$	-									
Landlord Incentives (unique activity)	\$	-									
Volunteer Incentives (unique activity)	\$	-									
Training (unique activity)	\$	-									
Subtotal Homelessness Prevention	\$	-	\$	-	\$	-	\$	-	\$	-	\$
Expenditures for Temporary Emergency Shelter											
Essential Services	\$	-									
Operations	\$	-									
Leasing existing real property or temporary structures	\$	-									
Acquisitions	\$	-									
Renovations	\$	-									
Hazard Pay (unique activity)	\$	-									
Landlord Incentives (unique activity)	\$	-									
Volunteer Incentives (unique activity)	\$	-									
Training (unique activity)	\$	-									
Subtotal Homelessness Prevention	\$	-	\$	-	\$	-	\$	-	\$	-	\$
Expenditures for Street Outreach											
Essential Services	\$	-									
Hazard Pay (unique activity)	\$	-									
Handwashing Stations & Portable Bathrooms (unique activity)	\$	-									
Landlord Incentives (unique activity)	\$	-									
Volunteer Incentives (unique activity)	\$	-									
Training (unique activity)	\$	-									
Subtotal Homelessness Prevention	\$	-	\$	-	\$	-	\$	-	\$	-	\$
Other ESG-CV Expenditures											
Training (unique activity)	\$	-									
HMS	\$	-									
Administration	\$	-									
Subtotal Other Expenditures	\$	-	\$	-	\$	-	\$	-	\$	-	\$
TOTAL ESG-CV EXPENDITURES	\$	-	\$	-	\$	-	\$	-	\$	-	\$

