SNAP
FAQ’S

Idaho Housing
and Finance
Association

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GENERAL FAQ'S

What is a "recipient" of program funds?

A program recipient is an applicant of specific program funding that executes a grant agreement with HUD for those program funds. To be eligible to apply for HUD program funds, an applicant must be a private nonprofit organization, State, local government or instrumentality of State or local government, or a public housing agency.

What is a "subrecipient" of program funds?

A subrecipient of a program is a private nonprofit organization, State or local government, or instrumentality of a State or local government, or a public housing agency that receives a subgrant from a recipient to carry out all or part of a program project.

What is Category 1 of the homeless definition?

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

- Has a primary nighttime residence that is a public or private place not meant for human habitation; or
- Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or
- Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

What is Category 2 of the homeless definition?

Imminent Risk of Homelessness - An individual or family who will imminently lose their primary nighttime residence, provided that:

- Residence will be lost within 14 days of the date of application for homeless assistance
- No subsequent residence has been identified; and

- The individual or family lacks the resources or support networks needed to obtain other permanent housing.
  Note: Includes individuals and families who are within 14 days of losing their housing, including housing they own, rent, are sharing with others, or are living in without paying rent.

What is Category 3 of the homeless definition?

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

- Are defined as homeless under the other listed federal statutes.
- Have not had a lease, ownership interest in permanent housing during the 60 days prior to the homeless assistance application.
- Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; and
- Can be expected to continue in such status for an extended period of time due to special needs or barriers
  Note: HUD has not authorized any CoC to serve the homeless under Category 3.

What is Category 4 of the homeless definition?

Fleeing or attempting to flee domestic violence (DV) - Any individual or family who:

- Is fleeing, or is attempting to flee, domestic violence.
- Has no other residence; and
- Lacks the resources or support networks to obtain other permanent housing

What are the levels of regulations for HUD grants?

Subrecipients must follow all federal policies and regulations concerning the CoC and ESG programs. As long as subrecipient policies don't lessen the strength of other prevailing policies, subrecipients can utilize the following (in order of most to least enforceable):

1. HEARTH Act and OMB Circular 2 CFR 200
2. IHFA Written Standards
3. IHFA Grant Agreement
4. Subrecipient Policies and Procedures

What are the components of a Grant Agreement?

Grant Agreements are legally binding contracts between IHFA and subrecipients, which provide specific details on grant administration.

- Funding amounts, eligible activities, and match requirements
- HUD requirements (24 CFR 576 or 578, 2 CFR 200, Cost Principals, Audit Requirements, etc.)

- Compliance with Written Standards and governance documents
- Policies on reimbursements
- Record retention (5 years for ESG)
- Reporting requirements
- Participation in HIC, CoC, CE, Regional Coalitions, PIT, etc.
- Details penalties for not abiding by the terms listed in the Grant Agreement

Does the homeless participation requirement apply to us?

Yes. It applies to metropolitan cities, urban counties, and territories. The Interim Rule states that each recipient that is not a State must provide for the participation of at least one homeless or formerly homeless person on the board of directors or other equivalent policy making entity of the recipient. The HIC has used discretion to also require subrecipients to provide for the participation of homeless or formerly homeless person(s) on their board or policy making entity. For further information, please review the IHFA grant agreement for your specific project.

What is the Purpose of the Written Standards?

The Written Standards are not intended to be used in lieu of or in place of the Interim Regulations for the HEARTH Act, but they are intended to establish and clarify local decisions regarding program administration. All HUD-funded subrecipients must follow the Interim Regulations for CoC and ESG in their entirety, as well as the HIC's Written Standards.

The Written Standards have been established to ensure that persons experiencing homelessness who enter programs throughout the Idaho Balance of State will be given similar information and support to access and maintain permanent housing. All CoC or ESG funded subrecipients shall comply with the minimum standards established by the HIC; although, each provider may decide to set standards on their provision of CoC or ESG that exceed the minimum requirements, if those standards do not conflict with the Housing First focus.

What is Housing First?

Housing First is "The most successful model for housing people who experience homelessness is permanent supportive housing using the Housing First approach, which is a participant-driven strategy that provides immediate access to housing without requiring participation in treatment or other service participation requirements."

What are the principles of the Housing First model?

Housing first principals include:

- Few to no programmatic prerequisites to permanent housing entry
- Low-barrier admissions policy

- Rapid and streamlined entry into housing
- Supportive services are voluntary, but can and should be used to persistently engage tenants to ensure housing stability
- Tenants have full rights, responsibilities, and legal protections
- Practices and policies to prevent lease violations and evictions
- Applicable in a variety of households

What is NSPIRE and when must we comply with it?

Subrecipients currently use HQS (Housing Quality Standards) to perform physical inspections of units and property. NSPIRE (National Standards for the Physical Inspection of Real Estate) will replace HQS starting on Oct. 1, 2025. Specific training on NSPIRE standards will occur in the future, but subrecipients are encouraged to familiarize themselves with the Standards early, and to utilize the HIC's Written Standards as updates become available.

Can religious or faith-based organizations apply for funding?

Subrecipients receiving CoC or ESG program funding cannot engage in inherently religious activities which are supported through the programs and cannot discriminate against a participant based on religion or religious beliefs. Such activities must be offered separately from funded programs and services and participation must be voluntary. A religious organization receiving funding can still retain independence from government and may continue with its mission provided that program funds are not used to support inherently religious activities. All funded organizations retain its authority over its internal governance.

What is a conflict of interest and what are some examples?

Conflicts of interest arise when funding received by an agency directly benefits others who have a direct interest in a project or program. Conflicts of interest can arise between anyone, but some examples would be employees or former employees (within a year of leaving employment), subrecipient consultants, officers, elected or appointed officials, persons with decision-making capabilities, or family members. Other conflicts of interest can arise with those who may be seen as having a vested interest in the project or program such as board members, or during the procurement process (securing services, goods, supplies, or equipment), or with and organizational Conflict where relationships with other persons in the organization may allow someone to not be impartial.

What is Fair Housing?

Fair Housing can simply be defined as "the right of all people to be free from discrimination in housing". The protected classes are: race, color, religion, ethnicity, sex, sexual orientation, age, disability, familial status, gender identity, national origin, and veterans.

What is Section 504 of the Rehabilitation Act of 1973?

Simply put, “No otherwise qualified individual with a disability shall, solely by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” Section 504 covers facilities, programs, activities or services using federal funding. It requires reasonable accommodations or modifications that do not pose undue financial or administrative burden.

What are draws?

Draws are reimbursement requests that include expenses you’ve incurred on behalf of the program and which you are now requesting payment for. Some things to consider when making a draw request is if your spending aligns with your grant budget (what your project has available to spend), if you have the correct budget line items (sections of your budget), if your budget aligns with your expenditures, or most importantly if you are requesting reimbursement for ineligible costs. IHFA will keep you updated on your budget progress and will submit draw change notices to you when requests do not align correctly. It is encouraged to consistently review, adjust spending, request an amendment, or re-submit costs, etc. when you submit draws.

What are common issues that result in a draw change notice being sent?

Some common errors with draws are easily remedied, while others may delay reimbursements. Common errors include, but are not limited to math errors, totals not adding correctly, overdrawing budget line items, not paying attention to caps on the budget, claiming ineligible expenses, costs outside of eligible grant period, not utilizing hourly rates on file, missing leases/number of bedrooms, or no explanation of rental assistance costs.

What sources can be used for Cash match?

- Grants from private, local, state, and federal resources (if not statutorily prohibited by source)
- Cash resources (actual “cash on hand”)
- Revenues from fundraising efforts organized by the recipient or subrecipient.
- Recipient or subrecipient staff working on grant eligible activities who aren't paid from the CoC or ESG grant but are paid from other agency resources.

What sources can be used for In-Kind match?

- Subrecipients may use the value of any real property, equipment, goods, or services contributed to the project as match, provided that the subrecipient would have had to pay for them with grant funds.
- A memorandum of understanding (MOU) is required for all in-kind match contributions and must be provided when submitting CoC applications.

What are the requirements of a Memorandum of Understanding?

A memorandum of understanding (MOU) is a written document that must establish unconditional commitment, by the third party to provide the services, the specific service to be provided, the profession of the persons providing the service, and the hourly cost of the service to be provided. At a minimum, a MOU must be executed between a subrecipient and a third-party service provider and include the following information:

- Agency Information - Subrecipient's identifying information, Service provider's identifying information
- Unconditional Commitment of third-party provider to provide the service
- Description of services to Be provided
- Scope of Services to Be Provided and by Whom - Contract to be matched, Length of time, number of clients receiving the service over grant term, qualifications, value of services provided.
- Documentation requirements and responsibilities of service provider and recipient

A copy of the MOU must be provided to HUD upon request, prior to grant agreement execution, to document the required match for the grant.

What are Leveraged funds?

Leveraged funds are separate and distinct from match. They include cash or in-kind contributions in excess of the minimum required match and can be any financial assistance from public or private resources. However, leveraged funds do not include benefits received directly by program participant (i.e. SNAP benefits, Social Security, Medicaid, Child Care, etc.).

What happens during a grant monitoring?

The first item IHFA will utilize to determine the level of monitoring are Risk Assessments, which is what the SNAP team completes at end of grant term. Risk Assessments score subrecipients on various data-driven criteria concerning financial spend down, staff turnover, goals, etc. After the SNAP team scores each subrecipient, IHFA's Compliance team will conduct onsite monitoring of each project and will notify subrecipients which grants are being monitored. Typically, monitoring occurs after the end of a grant period, so any onsite visits could carry over into the forthcoming year's monitoring cycle. It should be noted that HMIS/CMIS monitoring will be completed by the HMIS Lead Agency, and all HMIS/CMIS users and HMIS/CMIS participating subrecipients will be monitored at least annually.

What are some good monitoring principles to ensure we're in compliance?

The best way to ensure a successful monitoring visit is to comply with CFR's for your program, and to utilize federal fiscal responsibilities under 24 CFR 84.21 and OMB Circular 2 CFR 200. In addition, you should follow all regulations outlined in the HIC's Written Standards, and regularly review the monitoring checklists located in the Written Standards. Keep your agency aware of any recordkeeping requirements and see your grant agreement for any HEARTH Act regulation citations. It is also strongly recommended that you conduct consistent internal reviews and audits of your grants to make sure files are up to date and ready for HUD/IHFA monitoring.

COC PROGRAM FAQ'S

What are HUD's priorities for the CoC program?

- Ending Chronic Homelessness (CH) - Housing First (HF) models which focus on housing the population and youth
- Ending Family Homelessness
- Removing Barriers to CoC resources
- Maximizing use of mainstream resources
- Building partnerships with the city, state, landlords and community
- Strategic Resource Allocation - Utilizing risk assessments and performance reviews to evaluate projects that are under performing

What is a Collaborative Applicant?

The Collaborative Applicant (CA) is the eligible applicant (State, unit of local government, private, nonprofit organization, or public housing agency) designated by the CoC to collect and submit the required CoC Application information for all projects the CoC has selected for funding and to apply for CoC planning funds on behalf of the CoC. The CoC may assign additional responsibilities to the CA so long as these responsibilities are documented in the CoC's governance charter.

As a subrecipient of CoC funds, what policies must we have in place?

Subrecipients must perform CoC's coordinated assessment on intake, follow federal regulations and IHFA's policies, and follow 2 CFR 200. In addition to this, subrecipients must have their own policies and procedures for administering assistance. This includes such things as a Program agreement, Termination Policy, Internal Controls, Low-barrier admissions Policy, Housing First Policy, etc.

How does a participant qualify for CoC assistance?

To qualify for CoC, a participant must be homeless as defined by the McKinney-Vento Act, be low-income (50% or below Area Median Income (AMI), and/or not have the resources or support networks to obtain/maintain housing. Under PSH component, participants must meet category 1 and/or 4 on HUD's definition of homelessness AND have a qualifying disability.

What are the main components of the CoC Program?

All CoC funding falls under Permanent Housing (PH), which is used to promote the development of supportive housing and supportive services which assist persons experiencing homelessness in transitioning from homelessness to living as independently as possible in safe, decent, affordable, and stable housing. There are two components of PH, which are as follows:

- Permanent Supportive Housing (PSH): Long-term leasing (or rental assistance) paired with supportive services to assist homeless persons with a disability to achieve housing stability.
- Rapid re-housing (RRH): Short-term or medium-term housing and supportive services assistance to obtain and maintain stability in PH. Rental assistance (TBRA) limited to no more than 24 months per household in a 3-year period.

What are the core components of PSH?

PSH is long term assistance of preferably a year or longer in which participants must have a disability.

Eligible Costs:

- Leasing (Subrecipient holds lease on unit)
- Supportive Services
- Operations
- HMIS/CMIS
- Administrative

What are the core components of RRH?

Rapid Rehousing (RRH) assistance consists of rent and utility assistance and supportive services to assist households with accessing stable housing as quickly as possible. RRH is short to medium term assistance (limited to 24 months in a 3-year period).

Eligible Costs:

- TBRA (Tenant Based Rental Assistance - Client holds lease on unit)
- Supportive Services
- Operations
- HMIS/CMIS
- Administrative

What is a “Lease” under the PSH component?

A lease under the PSH component type is where the subrecipient themselves choose housing of an appropriate size and affordability and where the lease is between project’s subrecipient and landlord. Leases need to be for the term of at least one year and the rent must be assessed. For every new lease, IHFA must be sent a copy.

How do leases work under the CoC program?

Under the CoC program a lease must be between subrecipient and landlord, and the subrecipient may choose to sub-lease between themselves and program participant. Can charge participant an occupancy charge based on either the highest of 30% adjusted income or 10% gross income. For CoC projects, both Fair Market Rent (FMR) and Rent Reasonableness standards apply.

Are there any costs besides rent that can be paid for with leasing funds?

Yes, but with some caveats. Utilities can only be charged to leases if they are included in the lease agreement. If the utilities are in the subrecipients name, then it can be taken from the Operations budget line item (if it has been included in subrecipient budget). A utility allowance can be applied if the participant is required to pay for utilities, but the utilities must be in the participant's name if they are required to pay utilities. In addition to utilities, leasing budgets can also pay for security deposits (up to 2 months of rent, if reasonable for the market) and vacancy payments, which can be paid until new participant moves in to comply with the lease or through the end of the lease.

Note: Leasing is **NOT** included in the 25% match requirement.

What is Tenant-Based Rental Assistance (TBRA) under the RRH component?

TBRA is specifically "tenant-based" in nature and project participants are able to choose housing of an appropriate size and affordability. With TBRA, the lease/rental agreement is between the participant and landlord.

How does TBRA work under the CoC program?

All leases/rental agreements are between the project participants and the landlords. Rental assistance payments can follow the participant from one unit to another, which allows the participant to choose housing for themselves. TBRA is awarded to subrecipients initially at FMR but capped at rent reasonableness. All participants must pay a portion of their rent, which is charged to participant based on highest of 30% adjusted income or 10% gross income (see the HIC's Written Standards for clarification).

Are there any costs besides rent that can be paid for with TBRA funds?

If there is a utility allowance, then subrecipients must pay the utility company on behalf of the program participant if the rent exceeds the utilities cost. If the participant is required to pay for utilities, then a utility allowance must be factored into the rent calculation determination.

In addition to utilities, TBRA can also pay for security deposits (up to 2 months of rent dependent on market), property damage (up to one month and limited to one time per participant), last month's rent (up to equivalent of 1 month of rent), vacancy payments (maximum of 30 days from end of the month in which the unit was vacated).

For institutionalized participants, TBRA may be used to continue to make rental payments on behalf of a participant that is institutionalized for a brief period, but does not exceed 90 days for each occurrence.

Note: TBRA **IS** included in the 25% match requirement.

What are Supportive Services?

Supportive Services is assistance directly associated with a participant, and which is aimed at moving homeless participants to independence. It must be offered to participants for the full period they are in the program and is required to be offered to participants at their annual assessment. A case manager usually administers supportive services, and salaries of staff working directly w/participants can be billed under supportive services.

What type of costs can we charge to Supportive Services?

Eligible costs for Supportive Services include the following: Annual Assessment of Service Needs; Assistance with Moving Costs; Case Management; Child Care; Education Services; Employment Assistance and Job Training; Food; Housing Search and Counseling Services; Life Skills Training; Mental Health Services; Outpatient Health Services; Substance Abuse Treatment Services; Transportation; Utility Deposits.

Can CoC funds be used to purchase things like cell phones, wireless plans, etc.?

Yes, under certain conditions. Costs of supplies and materials are an eligible supportive service cost when incurred by subrecipients in the provision of supportive services to program participants. To qualify as an eligible supply and material cost the cell phone must be owned by the subrecipient themselves and the wireless service plan must be the subrecipient's as well, but the phone may be loaned to program participants as needed to enable provision of supportive services necessary to obtain and retain housing.

May CoC program funds be used to purchase gift cards for participants?

No, gift cards are considered a form of cash. Under the CoC program, subrecipients are prohibited from making direct cash payments to program participants.

What is Operations funding?

Funds may be used for the day-to-day operating costs of a single structure or individual housing unit(s), including maintenance (such as scheduled replacement of major systems), repair, building security (when CoC Program funds pay for more than 50 percent of the facility by unit or area), etc. These costs may not be combined with rental assistance costs within the same unit or structure.

What types of costs can we charge to Operations?

Eligible costs for Operations include the following: Maintenance; Repair; Building Security; Electricity; Gas; Water; Furniture; Equipment; Property Insurance; Taxes.

Can Operations funding be used for building security?

Yes, but in order for building security to be an eligible operating cost under the CoC Program, more than 50% of the units or building area must be paid for with grant funds. If 50% or less of the units or building area is paid for with grant funds, even if the building is used 100% for housing for the homeless, then no costs for building security may be charged to the CoC Program grant.

What is eligible under the HMIS/CMIS line item?

These are costs related to entering client data or maintaining data in the HMIS or CMIS databases. Funds can be used in several ways, including to buy hardware, equipment, and software related to your database, for training, overhead, or for staffing (those who enter data).

What are Administrative costs?

Administrative costs are those associated with:

- Accounting for use of grant funds
- Preparing reports for submission to HUD
- Obtaining project audits
- Similar costs related to administering the grant after the award
- Staff time associated with these administrative costs
- Administrative costs are calculated at 7% of award (Half goes to subrecipient (3.5%), half goes to IHFA (3.5%))

What is the life cycle of the CoC grant from start to finish?

- CoC competition begins
- The Collaborative Applicant (IHFA) submits the CoC application and subrecipient applications
- HUD announces CoC award
- HUD processes T.S./match letters to release funds
- IHFA prepares grant agreements for execution
- Grant term begins: 7/1
- IHFA receives draw requests from subrecipients
- IHFA draws down funds & updates agency's budget
- IHFA monitors & sends notifications to agencies
- Grant term ends: 6/30
- IHFA closes out agency’s grants
- IHFA compliance monitoring

What are the match requirements for the CoC program?

The CoC program has a 25% match requirement, which consists of cash or in-kind payment for the provision of supportive services and operations under the grant. Match funds may be used for any eligible CoC expense, even if the line item is not identified in your budget but is still eligible under the program.

All required match will be listed on first page of your grant agreement. If an amendment is made which increases or decreases your match obligation, please check with IHFA to verify any new match requirement you're unsure of before signing your grant amendment. Cash match is highly encouraged as HUD requires MOU's for in-kind match. Recipients that are UFA's, such as IHFA, or are the sole recipient for their Continuum, may provide match on a Continuum-wide basis, but IHFA passes this obligation on to the subrecipient. As a UFA, IHFA reports match as one lump sum, and only reports match on actual expenditures throughout the grant year, not on awarded funds.

A recipient or subrecipient may use funds from any source, including any other federal sources (except funds from other CoC grants), as well as State, local, and private sources, provided that funds from the source are not prohibited to be used as match. The recipient must ensure that any funds used to satisfy the matching requirements are eligible under the laws governing the funds in order to be used as matching funds for a grant awarded under the CoC program.

Why are CoC funds recaptured?

CoC funding may be recaptured at any point during the grant year if a project is non-compliant and/or if funds are left unspent. The grant agreement your organization signs with IHFA will outline any penalties for underspending or if your project is required to have funds recaptured. Recaptured funds normally occur when subrecipients spend grant funds on ineligible expenses during the period of performance, when their grant outcomes are not aligned with HIC goals, or when their spending is not aligned with the amount of time that has passed during a given grant term. Typically, subrecipients will receive a "Slow Spender email" which is sent when an agency begins falling behind on expenditure progress. Slower spending is considered a risk factor used to determine subrecipient performance and it may negatively affect a subrecipient during the application phase. Here are a few things to consider:

- Reach out to IHFA to get help spending down funds
- Any funding not spent will be sent back to HUD
- Final draws due to IHFA within 30 days of grant completion date (7/30)

What are CoC reporting requirements?

The CoC program requires the submittal of an Annual Progress Report (APR), which is due to IHFA 30 days after grant expiration. IHFA will require the submission of a match letter required to verify final match amount and sources of match. IHFA also requires subrecipients to send an APR booklet, which details your expenditures on the project as well as any outcomes you had during the grant year. The APR is an opportunity to narrate the success and/or shortcomings of your program, provide detailed descriptions of outcomes, ensure eligibility of participants, verify costs allocated correctly

In addition to the APR booklet, IHFA will submit HMIS/CMIS data on project performance and will verify data with HMIS data quality reports. This also provides subrecipients a time to review checklists, check eligibility, discuss performance measures, utilization, unspent funds, etc.

Outside of CoC regulations, are there other regulations we must follow?

There are many rules and regulations that subrecipients of CoC program funds must follow outside of the normal CFR's covering the CoC program. All of these are covered extensively in the HIC's Written Standards, and should subrecipients have questions, they should find the most recent version of the Written Standards on the IHFA website. The following are the regulations or rules that apply to the CoC program: Homeless Participation, Faith-Based Activities, Involuntary Family Separation, Nondiscrimination, Termination and Grievance, Connections to Mainstream Resources, Environmental Review, Lead-Based Paint, VAWA (Violence Against Women Act), Rent Reasonableness, Emergency Transfer Plan, Equal Access/Reasonable Accommodations, Duplication of Benefits, Infectious Disease Preparedness, Build America Buy America, etc.

ESG PROGRAM FAQ'S

What are HUD's priorities for the ESG program?

- ESG was designed to support sheltered and unsheltered homeless persons as well as those at risk of becoming homeless.
- Providing the services necessary to help those persons to regain stability quickly in permanent housing
- Maximizing use of mainstream resources
- Training all new subrecipients on the ESG program annually – IHFA priority; annual ESG trainings will take place in November.
- Strategic Resource Allocation
- Utilize risk assessments, budgets, and performance reviews to evaluate projects that are under performing
- Data reports to determine where resources should be allocated.

What are some specific ESG general regulations?

For the ESG program, participants must meet one of the categories of the Homeless definition (see question under General FAQ's above). Under ESG, categories 1, 2, and 4 apply to various component types (see categories under "General FAQ's" section of this document) Units subsidized through ESG Rental Assistance funds must be at or below Fair Market Rent (FMR) and must meet rent reasonableness standards. Under this guideline, Rent Reasonableness will apply to both the Rapid Rehousing and Homeless Prevention program components.

What policies must ESG subrecipients follow?

Subrecipients of ESG funding must align their projects policies and procedures with Federal, State, and local regulations. This includes but is not limited to: participation in Coordinated Entry, following Federal regulations (CFR's, Hearth Act, etc.), HIC policy manuals, adhering to a signed ESG Grant Agreement, 2

CFR 200. In addition to this, subrecipients must develop their own policies and procedures for administering assistance, which includes having: a program agreement, termination policy, internal controls, low-barrier admissions, and following Housing First.

How does a participant qualify for assistance under ESG?

To qualify for ESG, participants must be homeless as defined by the McKinney-Vento Act, and for ESG specifically they must meet category 1, 2, and/or 4 of HUD's homeless definition. They must be low-income (at or below 30% of Area Median Income - For RRH and HP) and must not have the resources or support networks to obtain/maintain housing. For Shelter grants, participants must also be unable to resolve a housing crisis and have no alternatives for temporary housing.

Does the 30% area median income (AMI) limit apply to all ESG components?

- For RRH grants, an income assessment is not required at initial evaluation. However, at annual re-evaluation, income must be less than or equal to 30% AMI.
- For HP grants, households must have an income below 30% AMI at initial evaluation, and have no other housing options, financial resources, or support networks. At re-evaluation the participant must have an annual income less than or equal to 30% AMI.
- The 30% AMI limit does not apply to program participants who are being served under the Shelter or Street Outreach components.

Can we request additional funding for our ESG project?

ESG funds are much easier to shift than CoC funds. ESG funds may be reallocated among projects or between eligible line items within a single project budget. Due to the ease at which this can happen, it is encouraged that you reach out to your Grant Coordinator and request a change in your budget. All unspent funds remaining in budgets 30 days after the grant ends (October 30th) will be automatically recaptured and reallocated to other ESG projects.

What are the core components of an ESG Shelter grant?

Shelter funding is used to provide a safe place for persons who have been unable to resolve a housing crisis and have no alternatives for temporary housing. One goal of the HIC is to provide funding to assist residents in moving from a shelter into stable housing as quickly as possible. Shelter funds may be used for costs of providing essential services to homeless families and individuals in emergency shelters, renovating buildings to be used as emergency shelter for homeless families and individuals, and operating emergency shelters. Shelter is capped at 60% of the recipients ESG award.

What are the eligible costs under Emergency Shelter?

Eligible Activities under a Shelter grant mainly consists of the day-to-day operations of the shelter as well as the provision of supportive services.

- Services - Case Management, Childcare, Education Services, Employment assistance and job training, Outpatient health services, Life skills training, Mental health services, Substance abuse treatment services, Transportation
- Operations - Maintenance, Rent, Security, Fuel, Equipment, Insurance, Utilities, Food, Furnishings, Supplies, Hotel/Motel Vouchers
- Data Collection
- Administrative

What are the core components and eligible costs of a Street Outreach grant?

Street Outreach provides essential services related to reaching out to unsheltered homeless individuals and families, connecting them with emergency shelter, housing, critical services, and providing them with urgent, non-facility-based care. Funds may also be used for connecting them with emergency shelter, housing, or critical services, and providing urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. Eligible costs include:

- Street Outreach (Engagement, Case Management, Emergency Health Services/Mental Health Services, Transportation)
- HMIS/CMIS
- Administrative

What are the core components of an ESG Homelessness Prevention grant?

Homelessness Prevention (HP) funding provides financial assistance and supportive services to assist households in maintaining stable housing and avoid becoming homeless. HP may assist a household to recover from a temporary financial setback and may provide short-term stability while the household recovers. Participants can qualify through either Category 2 or 4 of the Homeless Definition.

What are eligible costs under Homelessness Prevention?

- Rent (TBRA) – see HIC Written Standards for payment requirements
- Financial Assistance (Limited to 6 months in a 1-year period): Rental Arrears, Utility Payments
- Services (Limited to 9 months in a 1-year period): Case Management, Housing Search and Placement
- Data Collection
- Administrative

Can ESG funds be used to assist with mortgage payments under HP?

No, ESG funds cannot be used to pay for mortgage payments

What are the core components of an ESG Rapid Rehousing grant?

Rapid Rehousing (RRH) assistance consists of financial assistance and supportive services to assist households with accessing stable housing as quickly as possible. RRH may assist a household in recovering from a temporary financial setback that caused homelessness, or, for households with more severe challenges, it may be a bridge to provide stability while the household increases income or is approved for affordable housing or permanent supportive housing. In addition, RRH can be either short- or medium-term assistance of up to 24 months in 3-year period.

What are eligible activities under Rapid Rehousing?

- Rent (TBRA) – see HIC Written Standards for payment requirements
- Financial Assistance - Rental Arrears, Utility Payments
- Services (Limited to 30 months in a 3-year period): Case Management, Housing Search and Placement
- Data Collection
- Administrative

What are some ESG program milestones?

- ESG program dates – 10/1 to 9/30
- Signed Grant Agreement
- Draw down funding, grant amendment(s) and funding shifts
- Consolidated Annual Performance & Evaluation Report (CAPER) - Reporting dates of 4/1 to 3/31 - You will report data on half of current grant and half of previous grant
- Renewal/New Project Applications - funding is not guaranteed under ESG. IHFA receives approximately $1.1 million annually under ESG, with anywhere from 35-45 individual grants.

What are the specific components of TBRA under the ESG program?

Tenant-Based Rental Assistance (TBRA) consists of components:

- Tenant-based (TBRA)
- Project participants choose housing of an appropriate size and affordability
- Lease is between participant and landlord
- Rent must be assessed
- Utility allowance from IHFA branch offices
- For every new lease, IHFA needs a copy

What are some eligible HMIS/CMIS costs?

These are costs related to entering client data or maintaining data in the HMIS or CMIS databases. Funds can be used in several ways, including to buy hardware, equipment, and software related to your database, for training, overhead, or for staffing (those who enter data).

What are eligible Administrative costs under the ESG program?

Administrative costs are those associated with the oversight and general management of the ESG program. Eligible costs include:

- Accounting for use of grant funds
- Preparing reports for submission to HUD
- Obtaining project audits
- Similar costs related to administering the grant after the award
- Staff time associated with these administrative costs
- Goods and Services (equipment, insurance, utilities, office supplies, maintenance of office space)
- Administrative costs are calculated at 7.5% of award (Over half goes to subrecipient (4%), remainder goes to IHFA (3.5%))

What are the match requirements for the ESG program?

The ESG program requires a 100% match commitment (match = subrecipient total ESG award) from eligible subrecipients, which can consist of cash or in-kind payment for the provision of all eligible component types under the grant. Match funds may be used for any eligible ESG expense, even if the line item is not identified in your budget but is still eligible under the program.

All required match will be listed on first page of your grant agreement. If an amendment is made which increases or decreases your match obligation, please check with IHFA to verify any new match requirement you're unsure of before signing your grant amendment. Cash match is highly encouraged as HUD may require MOU's for in-kind match.

A recipient or subrecipient may use funds from any source, including any other federal sources (except funds from other ESG grants), as well as State, local, and private sources, provided that funds from the source are not prohibited to be used as match. The recipient must ensure that any funds used to satisfy the matching requirements are eligible under the laws governing the funds in order to be used as matching funds for a grant awarded under the ESG program.

What are the ESG reporting requirements?

The ESG program requires annual reporting of project accomplishments through the Consolidated Annual Performance and Evaluation Report (CAPER), which is due to in April. Although the ESG program runs from 10/1-9/30, the reporting period for the program runs from 4/1-3/31. This poses some confusion to subrecipients, as some will be reporting on two separate grant years.

IHFA reports demographic and financial information in Sage, and narrative information is reported in IDIS. IHFA will set up Sage reporting links for ESG subrecipients and subrecipients can expect to receive a Sage link for uploading your HMIS/CMIS CSV data files. Subrecipients may be requested to verify data and make any necessary corrections with the HMIS Lead Agency. This will also provide a time to review checklists, check eligibility of participants, and discuss performance measures.