

2021 ESG Application

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SECTION I – Introduction

The Emergency Shelter Grants Program was established by the Homeless Housing Act of 1986 in response to the growing issue of homelessness in the United States. In 1987, the program was incorporated into Title IV of the Stewart B. McKinney Homeless Assistance Act (42 U.S.C. Sec. 11371-11378), now known as the McKinney-Vento Homeless Assistance Act. The U.S. Department of Housing and Urban Development (HUD) awards these funds to the State of Idaho. The Governor of Idaho has designated Idaho Housing and Finance Association to administer ESG funds on behalf of the State.

The Emergency Solutions Grants (ESG) Program was created to replace the Emergency Shelter Grants program when the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act was signed into law on May 20, 2009. The HEARTH Act amended and reauthorized the McKinney-Vento Homeless Assistance Act and included major revisions to the Emergency Shelter Grant Program.

The new ESG Program is designed to support sheltered and unsheltered homeless persons, as well as those at risk of homelessness, and provide the services necessary to help those persons to regain stability quickly in permanent housing after experiencing a housing crisis and/or homelessness. The change in program name reflects the change in focus from addressing the needs of the homeless in emergency or transitional shelters to assisting people to regain stability in permanent housing.

ESG funds are awarded on a competitive basis through an application and award process.

SECTION II – Application Process

Program Timeline

IHFA will administer one funding round for the 2021-2022 ESG Program. The application timeline is below.

June 7	Intent to apply
June 14	Application open for submission
June 22 at 2:00 pm MDT	Application training webinar https://attendee.gototraining.com/r/4860841266348200450 NOTE: the webinar will be recorded and available on IHFA’s website
July 30 at 5:00 pm MDT	Application deadline
August 31	Awards issued
October 1	Grant year begins

Application Submission

IHFA will accept applications from June 14, 2021 until July 30, 2021 at 5:00 pm MDT. The completed application and required attachments must be submitted through Procorem, a secure portal used to transmit documents. The Authorized Official must sign the application digitally and the application must be uploaded to Procorem as a completed fillable PDF.

Please email snap@ihfa.org on or after June 7, 2021 to indicate your intention to apply. You will receive a confirmation email with a link to access Procorem.

Idaho's ESG program is a competitive process. IHFA will review all submissions for completeness of application materials. Incomplete applications may not be considered for funding. IHFA will explain any rejections upon request. Additionally, technical assistance may be provided for application submissions upon request.

Contact Information

All questions related to these guidelines should be directed to:

Special Needs Assistance Programs (SNAP) team
Idaho Housing and Finance Association
email: snap@ihfa.org

Additional information about Idaho's ESG Program can be found online at:

<https://www.idahohousing.com/homelessness-services-programs/emergency-solutions-grants/>

SECTION III – Conditions for Funding

1. Written Standards

The Idaho Balance of State Continuum of Care has developed Written Standards to provide guidance to subrecipients in administering ESG projects. Subrecipients must comply with these Written Standards. The Written Standards are not intended to be used in place of the Interim Regulations for the HEARTH Act; rather, they are intended to establish and clarify local decisions regarding program administration.

Current Written Standards can be found at: <https://www.idahohousing.com/homelessness-services-programs/idaho-homelessness-coordinating-committee/>

Ada County applicants must comply with their CoC's Written Standards, which are available by request. Please email Casey Matoon (cmatoon@cityofboise.org).

2. Code of Federal Regulations

Subrecipients must comply with HUD's Code of Federal Regulations (CFR) related to the funding of Emergency Solutions Grants. CFRs are the codification of the general and permanent regulations published in the Federal Register by the executive departments and agencies of the federal government of the United States. CFRs provide the framework for the ESG grant, as intended by the Interim Regulations for the HEARTH Act.

Some of the CFRs pertinent to the ESG grant are listed in the Appendix. All CFRs can be found at: <https://www.law.cornell.edu/cfr/text/24/part-576>

3. Coordinated Entry

All homelessness assistance providers receiving ESG funding must participate in Coordinated Entry (also known as Homeless Connect or, for Ada County applicants, Our Path Home CONNECT). The policies and procedures for Homeless Connect are detailed in the Homeless Connect Operating Procedures, found at: <https://www.idahohousing.com/homelessness-services-programs/idaho-homelessness-coordinating-committee/>

Additional information about Our Path Home CONNECT can be found at: <https://www.ourpathhome.org/services/our-path-home-connect/>

4. HMIS/Comparable Database

Subrecipients must collect and report all HUD-required universal data elements and program-specific data elements, as well as adhere to the applicable CoC's imposed data collection requirements. To facilitate this, subrecipients must participate in the Homeless Management Information System (HMIS) or one of two designated comparable databases (if the agency primarily provides services to survivors of domestic violence).

The two comparable databases are the DVIMS (Domestic Violence Information Management System), operated for domestic violence service providers located in Ada County, and the CMIS (Community Management Information System), operated for domestic violence service providers located throughout the rest of the state of Idaho.

Additional information about HMIS can be found at: <https://www.idahohousing.com/homelessness-services-programs/hmis/>
<https://icalliances.org/boise>

Additional information about comparable databases can be found at: <https://www.hudexchange.info/resource/6305/hmis-comparable-database-manual/>

5. Housing First

ESG-funded Homelessness Prevention and Rapid Rehousing projects must adhere to Housing First standards. Emergency Shelter projects should strive to adhere to Housing First standards. Housing First Standards include:

- I. Few to no programmatic prerequisites to permanent housing entry
- II. Low-barrier admission policies
- III. Rapid and streamlined entry into housing
- IV. Supportive services are voluntary, but can and should be used to persistently engage tenants to ensure housing stability
- V. Tenants have full rights, responsibilities, and legal protections
- VI. Practices and policies to prevent lease violations and evictions
- VII. Applicable in a variety of housing models

Additional information about Housing First can be found at: https://www.usich.gov/resources/uploads/asset_library/Housing_First_Checklist_FINAL.pdf

6. Match

Under ESG, providers agree to match 100% of funds available under the Grant Agreement with funding from other sources. These sources may not come from other federal awards unless that award is designated by federal statute as one that may be used for matching. All match funds must be spent on ESG-eligible activities within the grant period. The following are eligible types of match contributions:

I. Cash

II. In-Kind (noncash contributions)

- The value of any real property, equipment, goods, or services contributed to the subrecipient's ESG program, provided that if the subrecipient had to pay for them with grant funds, the costs would have been allowable.
- Costs paid by program income shall count toward meeting the subrecipient's matching requirements, provided the costs are eligible ESG costs that supplement the subrecipient's ESG program.

Upon grant award, subrecipients will be required to submit a memorandum of understanding (MOU) detailing the anticipated match.

7. Active Participation/Coalition Meetings

Subrecipients must abide by participation requirements of their local CoC.

8. Annual Point-In-Time (PIT) Count

Subrecipients must agree to participate in the PIT count, at a date to be determined by HUD and upon notification from IHFA.

9. Reporting & Monitoring

Subrecipients must submit all required performance reports to IHFA. Subrecipients must also comply with annual monitoring conducted by IHFA. Agencies may be subject to additional auditing by HUD.

SECTION IV – Application Performance Measures

In 2021, all agencies are required to complete the enclosed ‘new project application,’ which begins on page 7, regardless of previous experience administering ESG projects. New applications will be scored based on the following outline:

APPLICATION SECTION	MAXIMUM POINTS AVAILABLE
Agency narrative	30 points
Project narrative	30 points
Regional allocation	20 points
Financial stability and match ability	20 points
TOTAL	100 points

Narrative Sections

Answer each narrative question thoroughly, yet concisely. Please limit answers to 250 words each, unless otherwise indicated. Applications will be screened by an IHFA SNAP team member and scored by an independent review panel. Final scores will be provided to applicants upon request. Scoring is based on the following:

0 points	Incomplete/ No Response: The response is missing, incomplete or unclear. The answer does not demonstrate the value of the project or its alignment with the goals outlined in the Consolidated Plan .
3 points	Acceptable Response: The response provides an answer to the question asked; however, sufficient details are lacking. The answer does not fully demonstrate the value of the project, including its alignment with the goals outlined in the Consolidated Plan .
5 points	Excellent Response: The response provides a clear, thorough answer to the question asked. The answer fully demonstrates the value of the project, including its alignment with the goals outlined in the Consolidated Plan .

Agency Narrative: The applicant will complete the agency narrative once, regardless of the number of grant components for which the applicant is requesting funding. This section contains six narrative questions.

Project Narrative: The applicant will complete each section relevant to the grant component (e. g. emergency shelter, homelessness prevention or rapid rehousing) for which the applicant is requesting funding. Therefore, one applicant may complete multiple sections. Each project section contains six narrative questions.

Regional Allocation

The regional allocation will be calculated by IHFA, taking the following data into account:

- Population
- Average rent
- Median income
- Percentage of population at or below poverty level
- Number of homeless individuals, as listed in the most recent IHFA Annual Homelessness Report

The data will be weighted by region and calculated into each applicants final score.

Financial Stability & Match Ability

The score for this section will be based on the following:

- Financial stability
- ESG budget in relation to agency budget
- Match ability, compared to 2018/2019 and 2019/2020 funding sources (if applicable)

In 2022, current ESG subrecipients will utilize a renewal grant application if there are no substantial changes to the request. A substantial change is considered an increase or decrease exceeding a 10 percent variance to project budget and/or project goals. Renewal applications will be scored based on the following:

APPLICATION SECTION	MAXIMUM POINTS AVAILABLE
Agency and project narrative	60 points, point value will be rolled-over from previous application score
Regional allocation	20 points, new calculation
Financial stability and match ability	20 points, new score
2020 ESG grant outcomes	30 points
TOTAL	130 points

Outcomes

Outcomes are based on 2020 ESG grant projects (not ESG-CV grants). This section will be scored based on performance:

- Ability to meet project goals
- Percentage of award expended at (grant) year-end, relative to the initial award amount
- Number of monitoring findings (scaled to program size)
- HMIS/CMIS or DVIMS data quality
- Regional coalition participation
- Fulfillment of matching funds

Answer each narrative question thoroughly, yet concisely. Unless otherwise indicated, please limit your answers to 250 words each.

GENERAL AGENCY (ALL APPLICANTS)

1. Identify the target population(s) on which the agency focuses. Select all that apply:

- Chronically homeless
- At-risk of homelessness
- Domestic violence
- Veterans
- Unaccompanied youth (ages 18-24)
- Families/multi-person households
- Single individuals

2. Describe the agency's experience working with the population(s) served. (NOTE: 400 word maximum)

GENERAL AGENCY

3. Describe the basic organization and management structure of the agency.

[Empty space for describing the basic organization and management structure of the agency.]

4. List the three most significant outreach activities on which the agency focuses time and resources to ensure that the intended populations are reached. Indicate the staff person(s) responsible for this activity and the approximate number of hours they spend on the activity each month. **(NOTE: 50 word maximum per Outreach Activity Description)**

	OUTREACH ACTIVITY DESCRIPTION	STAFF MEMBER(S)	HOURS/MONTH
EXAMPLE	<i>Community presentations: each month, staff members give presentations at various community events, including civic organization gatherings, health district meetings, school district meetings and chamber of commerce events. During these presentations, we focus on current trends within the community and services the agency offers to those at risk of homelessness.</i>	<i>Jane Smith, Executive Director Joe Taylor, Director of Community Relations</i>	<i>12</i>

GENERAL AGENCY

5. Identify three mainstream resources to which the agency most frequently refers individuals (see pages 27-28 of this document for information regarding mainstream resources). Explain the agency's role in supporting individuals as they pursue and utilize these resources. (NOTE: 100 word maximum each)

#1:

#2:

#3:

6. Describe the agency's experience effectively utilizing grant funds, given funding and time limitations.

Answer **ONLY** the questions applicable to the project component(s) included within this application:
Emergency Shelter, Homelessness Prevention and/or Rapid Rehousing. Please limit responses to 250 words.

EMERGENCY SHELTER

1. Describe the need for this project in the agency's service area (define service area).

2. Describe the project and how it meets the needs of the community.

EMERGENCY SHELTER

3. Describe the intake process for the emergency shelter.

4. What is the average length of stay for individuals/households? How does the project support individuals/households as they transition from the emergency shelter to permanent housing?

EMERGENCY SHELTER

5. For agencies providing supportive services, describe the case management program and how individual needs are assessed. For agencies that do not provide supportive services, indicate 'not applicable'.

6. Does the agency have the capacity to implement the project immediately? Provide an explanation.

EMERGENCY SHELTER PROJECT GOALS	
At maximum capacity (one point in time), how many beds are available through the emergency shelter program?	
At maximum capacity, what is the maximum number of households that could stay at the shelter at one point in time? Indicate the most likely scenario based on the population the project is serving.	
Household(s) with adults only (over age 18), no children	
Household(s) with unaccompanied children only (under 18)	
Household(s) with adults and children	
Maximum number of households served at one point in time	
At maximum capacity, what is the maximum number of participants that could stay at the shelter at one point in time? Indicate the most likely scenario based on the population the project is serving.	
Adults (over age 24)	
Young adults (age 18- 24)	
Unaccompanied children (under 18)	
Accompanied children (under 18)	
Maximum number of participants served at one point in time	

HOMELESSNESS PREVENTION

1. Describe the need for this project in the agency's service area (define service area).

2. Describe the project and how it meets the needs of the community.

HOMELESSNESS PREVENTION

3. Describe the process for determining program eligibility and the amount of assistance that may be provided to each individual or household.

4. Describe how – and how often – the agency’s case managers are working with program participants (or offering support) to develop a plan to maintain housing stabilization.

HOMELESSNESS PREVENTION

5. How does the project support individuals returning from institutionalized housing or care to maintain stable housing?

6. Does the agency have the capacity to implement the project immediately? Provide an explanation.

HOMELESSNESS PREVENTION PROJECT GOALS

Through this ESG homelessness prevention program:

On average, how many months of tenant-based rental assistance will the agency provide per household?	Approximately how many households will utilize tenant-based rental assistance?	How many individuals, including children, will benefit from tenant-based rental assistance? Provide a range (minimum to maximum).

RAPID REHOUSING

1. Describe the need for this project in the agency's service area (define service area).

2. Describe the project and how it meets the needs of the community.

RAPID REHOUSING

3. Describe the process for determining program eligibility and the amount of assistance that will be provided to each individual or household.

4. Describe how – and how often – the agency’s case managers are working with program participants (or offering support) to develop a plan to obtain and maintain housing stabilization.

RAPID REHOUSING

5. How will the agency recruit and retain landlords/housing providers?

6. Does the agency have the capacity to provide services immediately? Provide an explanation.

RAPID REHOUSING PROJECT GOALS	
At maximum capacity (on a single night), how many units are available through the rapid rehousing program?	
At maximum capacity, how many households could stay in these units on a single night? Indicate the most likely scenario based on the population the project is serving.	
Household(s) with adults only (over age 18), no children	
Household(s) with unaccompanied children only (under 18)	
Household(s) with adults and children	
Maximum number of households , TOTAL:	
At maximum capacity, how many participants could stay in these units on a single night? Indicate the most likely scenario based on the population the project is serving.	
Adults (over age 24)	
Young adults (age 18- 24)	
Unaccompanied children (under 18)	
Accompanied children (under 18)	
Maximum number of participants , TOTAL:	

SECTION VI – Supplemental Documents

The following documents must be submitted with the grant application. Failure to submit all supplemental documents will result in an invalid application entry.

- A. Agency documentation
 - (1) Current organizational chart
 - (2) Current list of Board of Directors
- B. Financial documentation
 - (1) IRS 501(c) (3) determination letter
 - (2) Most current financial audit
 - (3) Balance sheet for April 30, 2021
 - (4) Profit & loss statement, October 1, 2019 – September 30, 2020
 - (5) Profit & loss statement, October 1, 2020 – April 30, 2021
 - (6) Federally approved cost allocation plan and indirect cost rate, if applicable
- C. Policies and procedures
 - (1) Affirmative fair housing marketing plan
 - (2) Confidentiality
 - (3) Recordkeeping
 - (4) Conflicts of interest
 - (5) Affirmative outreach
 - (6) Agency intake procedures
 - (7) Nondiscrimination and equal opportunity
 - (8) Involuntary family separation (emergency shelter grants)
 - (9) Homeless child and family educational support, if applicable

APPENDIX A: Glossary of Terms

At-risk of Homelessness – An individual or family who has income below 30% of area median family income for the area, as defined by HUD, and who does not have sufficient resources or support networks immediately available to prevent them from moving into an emergency shelter or other place described in the “homeless” definition and meets one of the following conditions:

- Has moved because of economic reasons two or more times during the prior 60 days;
- Is living in the home of another because of economic hardship;
- Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days;
- Lives in a hotel or motel (which is not paid for by charitable organizations or by government programs for low-income individuals);
- Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room;
- Is exiting a publicly funded institution or system of care; or
- Is a child or youth who does not qualify under this section but who qualifies as “homeless” under other federal regulations.

Chronically Homeless – A homeless individual with a disability who lives either in a place not meant for human habitation, a safe haven, or in an emergency shelter, or in an institutional care facility if the individual has been living in the facility for fewer than 90 days and had been living in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately before entering the institutional care facility. In order to meet the “chronically homeless” definition, the individual also must have been living as described above continuously for at least 12 months, or on at least four separate occasions in the last 3 years, where the combined occasions total a length of time of at least 12 months. Each period separating the occasions must include at least 7 nights of living in a situation other than a place not meant for human habitation, in an emergency shelter, or in a safe haven.

CoC/Continuum of Care – A group composed of representatives of relevant organizations, which generally includes nonprofit homeless providers; domestic violence service providers; faith-based organizations; governments; businesses; advocates; public housing agencies; school districts; social services providers; mental health agencies; hospitals; universities; affordable housing developers; law enforcement; organizations that serve homeless and formerly homeless veterans, and homeless or formerly homeless persons that are organized to plan for and provide a system of outreach, engagement, and assessment; emergency shelter; rapid rehousing; transitional housing; permanent housing; and prevention strategies to address the various needs of homeless persons and persons at risk of homelessness for a specific geographic area.

Community Management Information System (CMIS) – The Community Management Information System (CMIS) is a locally administered information system used to record and analyze client, service and housing data for individuals and families who are homeless or at risk of homelessness. It is used by Domestic Violence (DV) providers; they are prohibited from entering data on their clients into a

Homeless Management Information System (HMIS) yet are required to use a comparable database to collect and report on universal and program-specific data elements. The Community Management Information System (CMIS) developed and administered by IHFA provides this functionality for the state's DV providers.

Coordinated Entry System (CES) – Known as Homeless Connect in the Balance of State Continuum of Care and Our Path Home CONNECT in the Ada County/Boise City CoC. The system facilitates the coordination and management of resources and services through the crisis response system. CES allows users to efficiently and effectively connect people to interventions that aim to rapidly resolve their housing crisis. CES works to connect the highest need, most vulnerable persons in the community to available housing and supportive services equitably.

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.

Employee Compensation – Employee compensation includes payroll-related expenses, such as:

- Employer portion of Social Security tax
- Employer portion of Medicare tax
- State and federal unemployment tax
- Worker compensation insurance
- Employer portion of insurance (health, dental, vision, life, disability)
- Employer paid holidays, vacations, and sick days
- Employer contributions toward retirement plans

To allocate these costs, first determine the program component under which these costs fall; then allocate the costs to an activity within the component. For example, staff time expended on processing checks for utility payments for program participants could be eligible under the rapid re-housing component or the homelessness prevention component; the activity would be housing relocation and stabilization services. If processing checks for both components (rapid re-housing and homelessness prevention), staff time should be reimbursed in proportion to the actual hours worked on each ESG component. (See 2 CFR 200. 431 for more information regarding compensation and fringe benefits)**Homeless** – There are 4 categories within the definition of homelessness, as defined under the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act). The three categories that apply to the ESG program include:

Category 1: Literally homeless. Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

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

Category 2: Imminent risk of homeless. 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

Category 4: Fleeing/attempting to flee domestic violence. 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

Homeless Management Information System (HMIS) – Information system used to record, analyze and transmit client and activity data in regard to the provision of shelter, housing and services to individuals and families who are homeless or at risk of homelessness in a Continuum of Care (CoC).

Homelessness Prevention – Financial assistance, rental assistance, and services provided to individuals and families who are at imminent risk, or at risk of homelessness.

Household – A single individual or a group of persons who live together in one dwelling unit.

Housing First – An approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment or service participation requirements. Supportive services are offered to maximize housing stability and prevent returns to homelessness as opposed to addressing predetermined treatment goals prior to permanent housing entry.

Mainstream Resources – Commonly available resources within the community. Subrecipients must coordinate and integrate, to the maximum extent practicable, ESG-funded activities with mainstream housing, health, social services, employment, education, and youth programs for families and individuals that are currently homeless or at risk of homelessness. Examples of these programs include:

- Public housing programs assisted under section 9
- Housing programs receiving tenant-based or project-based assistance under section 8
- Supportive Housing for Persons with Disabilities
- HOME Investment Partnerships Program
- State Children's Health Insurance Program
- Medicaid/Medicare
- Mental Health and Substance Abuse Programs
- Supplemental Nutrition Assistance Program
- Services funded under the Workforce Investment Act
- Federal-State Unemployment Insurance Program
- Social Security Disability Insurance
- Supplemental Security Income
- Temporary Assistance for Needy Families (TANF)
- Women, Infants and Children

- Child and Adult Care Food Program
- Head Start

Participants – A homeless or at-risk of homeless individual or family who receive ESG assistance.

Rapid Re-housing – Housing relocation and stabilization services and short- or medium-term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing. Assistance may be provided for up to 24 months during any 3-year period.

Subrecipient – A non-profit organization that enters into a subrecipient agreement with IHFA to provide homeless services as outlined in the ESG application proposal.

APPENDIX B: Applicable Federal Requirements

Listed below are some of the federal requirements that apply to the ESG grant program. The list of regulations, as well as the description of each, is not all-inclusive or verbatim; some descriptions have been shortened or altered for readability. To obtain a thorough understanding of the regulations that govern the ESG grant, visit: <https://www.law.cornell.edu/cfr/text/24/part-576>

2 CFR Part 200 - Uniform administrative requirements, cost principals, and audit requirements for federal awards

Subrecipients must follow the policies, guidelines and requirements established in 2 CFR Part 200. Subrecipients' financial management systems shall provide for the following:

- Accurate, current, and complete disclosure of the financial results of each federally-sponsored project
- Records that identify adequately the source and application of funds for federally-sponsored activities
- Effective control over and accountability for all funds, property, and other assets

24 CFR § 5. 105 - Other federal requirements

Subrecipients must comply with all applicable fair housing and civil rights requirements, including, but not limited to, the Fair Housing Act, title VI of the Civil Rights Act of 1964, the Age Discrimination Act of 1975, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act. HUD-funded activities for housing shall be made available without regard to actual or perceived sexual orientation, gender identity, or marital status.

24 CFR § 5. 109 - Equal participation of faith-based organizations in HUD programs and activities

Faith-based organizations are eligible, on the same basis as any other organization, to participate in any HUD program or activity. Any organization that receives federal financial assistance under a HUD program or activity shall not, in providing services with such assistance or carrying out activities with such assistance, discriminate against a beneficiary or prospective beneficiary on the basis of religion, religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice.

24 CFR § 576. 102 - Emergency shelter component

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 Emergency Solutions Grant (ESG) funding or services and provides shelter to families with children under age 18.

24 CFR § 576. 400 - Area-wide systems coordination requirements

Centralized or coordinated assessment. Once the Continuum of Care has developed a centralized assessment system or a coordinated assessment system in accordance with requirements to be established by HUD, each ESG-funded program or project within the Continuum of Care's area must use that assessment system. The recipient and subrecipient must work with the Continuum of Care to ensure the screening, assessment and referral of program participants are consistent with the written standards.

Participation in HMIS. The subrecipient must enter data on all persons served and all activities assisted under ESG into the applicable community-wide HMIS in the area in which those persons and activities are located, or a comparable database, in accordance with HUD's standards on participation, data collection, and reporting under a local HMIS. If the subrecipient is a domestic violence service provider, it may use a comparable database that collects client-level data over time and generates unduplicated aggregate reports based on the data.

24 CFR § 576. 401 - Evaluation of program participant eligibility and needs

Evaluation and Re-evaluations. The subrecipient must conduct an initial evaluation to determine the eligibility of each individual or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing. The recipient or subrecipient must re-evaluate the program participant's eligibility and the types and amounts of assistance the program participant needs not less than once every 3 months for program participants receiving homelessness prevention assistance, and not less than once annually for program participants receiving rapid re-housing assistance.

Connecting program participants to mainstream and other resources. The subrecipient must assist each program participant, as needed, to obtain appropriate supportive services, including assistance in obtaining permanent housing, medical health treatment, 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.

Housing stability case management. While providing homelessness prevention or rapid re-housing assistance to a program participant, the subrecipient must require the program participant to meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability, and develop a plan to assist the program participant to retain permanent housing after the ESG assistance ends.

24 CFR § 576. 402 - Terminating assistance

If a program participant who receives ESG assistance violates program requirements, assistance may be terminated in accordance with a formal process established by the subrecipient that recognizes the rights of the individuals affected.

24 CFR § 576. 403 - Shelter and housing standards

Subrecipients are responsible for the performance of inspections to ensure that shelter and housing occupied by ESG participants meets the following standards.

- (a) Lead-based paint remediation and disclosure
- (b) Minimum standards for emergency shelters
 1. Structure and materials
 2. Access (shelter only)
 3. Space and security
 4. Interior air quality
 5. Water supply
 6. Sanitary facilities
 7. Thermal environment

8. Illumination and electricity
9. Food preparation
10. Sanitary conditions
11. Fire safety

24 CFR §576. 404 – Conflicts of interest

The provision of any type or amount of ESG assistance may not be conditioned on an individual's or family's acceptance or occupancy of emergency shelter or housing owned by the subrecipient, or a parent or subsidiary of the subrecipient. For the procurement of goods and services, the recipient and its subrecipients must comply with 2 CFR 200. 317 and 200. 318.

24 CFR §576. 405 – Homeless participation

The subrecipient must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policy-making entity of the recipient, to the extent that the entity considers and makes policies and decisions regarding any facilities, services, or other assistance that receive funding under Emergency Solutions Grant (ESG).

24 CFR § 576. 407 - Other federal requirements

Affirmative outreach. The recipient or subrecipient must make known that use of the facilities, assistance, and services are available to all on a nondiscriminatory basis. The recipient and its subrecipients 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, recipients and subrecipients are also required to take reasonable steps to ensure meaningful access to programs and activities for limited English proficiency (LEP) persons.

Environmental review. ESG activities are subject to environmental review under 24 CFR part 50. The subrecipient shall supply all available, relevant information necessary to perform for each property any environmental review required by 24 CFR part 50.

24 CFR § 576. 500 - Recordkeeping and reporting requirements

The subrecipient must have policies and procedures to ensure the requirements of this part are met, including those required by 2 CFR part 200. The policies and procedures must be established in writing and implemented by the subrecipient to ensure that ESG funds are used in accordance with the requirements. In addition, sufficient records must be established and maintained to enable the recipient and HUD to determine whether ESG requirements are being met. Subrecipients are required to show compliance with the program's regulations, including documentation for the following:

1. Homeless status
2. At risk of homelessness status
3. Determination of ineligibility
4. Annual income
5. Program participant records
6. Centralized or coordinated assessment systems and procedures
7. Rental assistance agreements and payments
8. Utility allowance
9. Shelter and housing standards

10. Emergency shelter facilities
11. Services and assistance provided
12. Coordination with Continuum of Care
and other programs
13. HMIS
14. Matching
15. Conflicts of interest
16. Homeless participation
17. Faith-based activities
18. Other federal requirements
19. Relocation
20. Financial records
21. Confidentiality

APPENDIX C: Summary of ESG Eligible Costs

Shelter, Homeless Prevention and Rapid Rehousing Grants	
HMIS (24 CFR 576. 107)	Purchasing or leasing computer hardware, software and/or software licenses
	Leasing office space, equipment, furniture, and utilities for HMIS activities
	Salaries, operating costs, and duties as required to operate an HMIS
	Trainings related to the use of HMIS
	Reporting to COC on HMIS
Admin. (24 CFR 576. 108)	Salaries and wages related to general management, oversight, coordination, monitoring and evaluation of grant project.
	Administrative services performed under third-party contracts or agreements, including general legal services, accounting services and audit services.
	Costs for goods and services required for administration of the project, including rental or purchase of equipment, insurance, utilities, office supplies, and rental and maintenance (but not purchase) of office space.
	Costs of providing training on ESG requirements and attending HUD-sponsored ESG trainings.

Specific to Emergency Shelter Grants	
Emergency Shelter (24 CFR 576. 102)	<p>ESG funds may be used to provide essential services to individuals and families, and operating emergency shelters.</p> <p>Participants must meet one of the following:</p> <ol style="list-style-type: none"> 1. Category 1: Literally Homeless 2. Category 2: Imminent Risk of Homelessness 3. Category 4: Fleeing/attempting to flee Domestic Violence
Essential Services	
Case Management	The cost of assessing, arranging, coordinating and monitoring the delivery of individualized services to meet the needs of the program participant.
	Using the centralized or coordinated assessment system.
	Conducting the initial evaluation, including verifying and documenting eligibility.
	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 survivors 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	The costs of childcare for program participants, including providing meals and snacks, and comprehensive and coordinated sets of appropriate developmental activities.

Education Services	When necessary for the program participant to obtain and maintain housing, the costs of improving knowledge and basic educational skills are eligible. Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED).
Employment Assistance and Job Training	The costs of employment assistance and job training programs are eligible, including classroom, online, and/or computer instruction; on-the-job instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential.
	Cost of providing reasonable stipends to program participants in employment assistance and job training programs.
	Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.
	Services that assist individuals in securing employment are: employment screening, assessment, or testing; structured job skills and job-seeking skills; special training and tutoring, including literacy training and prevocational training; books and instructional material; counseling or job coaching; and referral to community resources.
Outpatient Health Services	Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals.
	Funds may be used only for these services to the extent that other appropriate health services are unavailable within the community.
	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 medical treatment, preventative medical care, and health maintenance services, including emergency medical services; providing medication and follow-up services, including emergency medical services; providing medication and follow-up services; and providing preventative and non-cosmetic dental care.
Life Skills	The costs of 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 are eligible costs. These services must be necessary to assist the program participant function independently in the community. Component life skills training are budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public transportation, and parenting.
Mental Health Services	Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions.
	ESG funds may only be used for these services to the extent that other appropriate mental health services are unavailable or inaccessible in the community.

	<p>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 circumstances. Problem areas may include family and marital relationships, parent-child problems, or symptom management.</p> <p>Eligible treatment consists of crisis interventions; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.</p>
Substance Abuse Treatment Services	<p>Eligible substance abuse treatment services are designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors and are provided by licensed or certified professionals.</p>
	<p>ESG funds may only be used for these services to the extent that other appropriate substance abuse services are unavailable or inaccessible in the community.</p>
	<p>Eligible treatment consists of client intake and assessment, and outpatient treatment for up to 30 days. Group and individual counseling and drug testing are eligible costs. Inpatient detoxification and other inpatient drug or alcohol treatment are not eligible costs.</p>
Transportation	<p>Eligible costs consist of transportation costs of a program participant's travel to and from medical care, employment, childcare, or other eligible essential services facilities.</p>
	<p>The cost of a program participant's travel on public transportation.</p>
	<p>If services workers use their own vehicles, mileage allowance for service workers to visit program participants.</p>
	<p>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.</p>
	<p>Travel costs to accompany or assist program participants to use public transportation.</p>
Operations	
Maintenance	<p>Staff or contractor time related to maintenance, including the oversight of maintenance activities. Eligible activities include cleaning; minor or routine repairs of furnishings, equipment, and fixtures; and protective or preventative measures to keep a building, its systems, and its grounds in working order. Maintenance activities do not materially add to the value of the building/property.</p>
Security	<p>Staff time related to shelter security and oversight of security staff. Security staff are responsible for the safety of shelter residents and property. Other expenses related to safety, such as fire department inspections and security cameras, are eligible.</p>

Insurance	Insurance maintained by the organization in connection with the general conduct of its shelter operations are allowable.
Rent & Utilities	Rent and utilities for the shelter property. Eligible utilities include gas, electric, water, sewage, trash, telephone and internet.
Equipment & Furnishings	Items necessary for shelter operations are eligible.
Food & Supplies	Reasonable food for shelter residents. Supplies include cleaning supplies and other items for program participants such as bed linens and towels.
Hotel/Motel Vouchers	Where no appropriate emergency shelter is available for a homeless family or individual, eligible costs may also include vouchers for temporary stays.

Specific to Homeless Prevention Grants	
Homeless Prevention (24 CFR 576. 103)	<p>ESG funds may be used to provide services and rental assistance necessary to prevent an individual or family from moving into an emergency shelter or becoming homeless.</p> <p>Participants must meet one of the following:</p> <ol style="list-style-type: none"> 1. Category 2: Imminent Risk of Homelessness 2. Category 4: Fleeing/Attempting to Flee Domestic Violence <p>Participant income must be at or below 30% of area median income (AMI)</p>
Rental Assistance (24 CFR 576. 106)	<p>Rental assistance and payment of rental arrears (consisting of a one-time payment for up to 6 months), is eligible.</p> <p>Participants are only eligible for financial assistance up to 6 months during any 1-year period.</p>
Housing Relocation and Stabilization <u>Financial</u> (24 CFR 576. 105)	<p>Eligible expenses include rental application fees, security deposits (no more than 2 mo. rent), last month's rent, utility deposits, utility payments, utility arrears. Eligible utilities include gas, electric, water and sewage.</p> <p>Participants are only eligible for financial assistance up to 6 months during any 1-year period.</p>
Housing Relocation and Stabilization <u>Services</u> (24 CFR 576. 105)	<p>Housing Search and Placement – Support program participants in locating, obtaining, and retaining suitable permanent housing. This includes: assessment of housing barriers, needs, and preferences, development of an action plan, housing search, outreach to and negotiation with owners, assistance with submitting documents and assessment of housing for compliance with ESG requirements.</p> <p>Participants are limited to 9 months of services during any 1-year period.</p> <p>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. Using the centralized or coordinated assessment system, conducting the initial evaluation required, counseling, developing, securing, and coordinating services and 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, and conducting re-evaluations.</p> <p>Participants are limited to 9 months of services during any 1-year period.</p>

Specific to Rapid Rehousing Grants	
Rapid Rehousing (24 CFR 576. 104)	<p>ESG funds may be used to provide services and rental assistance necessary to prevent an individual or family move as quickly as possible into permanent housing and achieve stability in that housing.</p> <p>Participants must meet one of the following:</p> <ol style="list-style-type: none"> 1. Category 1: Literally Homeless 2. Category 4: Fleeing/Attempting to Flee Domestic Violence <p>Participant income must be at or below 50% of area median income (AMI).</p>
Rental Assistance (24 CFR 576. 106)	<p>Rental assistance and payment of rental arrears (consisting of a one-time payment for up to 6 months), is eligible.</p> <p>Participants are only eligible for financial assistance up to 24 months during any 3-year period.</p>
Housing Relocation and Stabilization <u>Financial</u> (24 CFR 576. 105)	<p>Eligible expenses include rental application fees, security deposits (no more than 2 mo. rent), last month's rent, utility deposits, utility payments, utility arrears. Eligible utilities include gas, electric, water and sewage.</p> <p>Participants are only eligible for financial assistance up to 24 months during any 3-year period.</p>
Housing Relocation and Stabilization <u>Services</u> (24 CFR 576. 105)	<p>Housing Search and Placement – Support program participants in locating, obtaining, and retaining suitable permanent housing. This includes: assessment of housing barriers, needs, and preferences, development of an action plan, housing search, outreach to and negotiation with owners, assistance with submitting documents and assessment of housing for compliance with ESG requirements.</p> <p>Participants are limited to 30 months of services during any 3-year period.</p> <p>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. Using the centralized or coordinated assessment system, conducting the initial evaluation required, counseling, developing, securing, and coordinating services and 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, and conducting re-evaluations.</p> <p>Participants are limited to 30 months of services during any 3-year period.</p>