



Strength, Dignity, Quality of Life

MISSOURI HOUSING

DEVELOPMENT COMMISSION

Coronavirus Emergency Solutions Grant (ESG-CV) Program **Funded Agency Training**

AIDAN RICH

ESG-CV GRANT SPECIALIST

Upcoming Trainings and Webinars

ESG-CV Update Q&A Part 1

- Wednesday, October 18th 11:00 am – 12:00 pm
- [Sign-up here](#)

ESG-CV Application Training

- Friday, August 27th

ESG-CV Finance Training

- Friday, September 3rd

ESG-CV Update Q&A Part 2

- Wednesday, September 8th 10:00 am – 11:00 am
- [Sign-up here](#)

New Organizational Layout

HUD Programs

- Emergency Solutions Grant (ESG)
- Coronavirus Emergency Solutions Grant (ESG-CV)
- Home Investment Partnership Program (HOME)

State Programs

- Missouri Housing Trust Fund (MHTF)
- Missouri Housing Innovation Program (MOHIP)
- Disaster Relief

Special Programs

- State Assistance for Housing Relief (SAFHR)

Important ESG-CV Contacts

Aidan Rich, ESG-CV Grant Specialist

- aidan.rich@mhdc.com
- Funding, Spending, Eligible Expenses, Forms, etc.

Charla Sallee, Grant Administrator

- charla.sallee@mhdc.com
- Payment request discards

Denise Hoss, Compliance Officer

- dhoss@mhdc.com
- Compliance, site visits, and desk reviews

Other MHDC Contacts

Cassie Sippos-Haas, ESG Grant Administrator

- cassie.sippos-haas@mhdc.com
- Annual ESG program (ESG-21 and ESG-22)

Lisa Moler, State Program Administrator

- lisa.moler@mhdc.com
- MHTF and MOHIP programs

SAFHR Program and MO Housing Resources

- mo.safhr@mhdc.com
- 1-833-541-1599
- <https://www.mohousingresources.com/>

Agenda

Part I: Changes from Notice 21-08

Part II: Eligible Components

Part III: Program Administration

Part IV: Grant Administration

Part V: Fair Housing Act

Part I

CHANGES FROM NOTICE 21-08

Vaccinating the Homeless

Vaccine Incentives

- Street Outreach, Standard Emergency Shelter, Temporary Emergency Shelter, Homelessness Prevention, and Rapid Rehousing
- \$50 **cash** for each coronavirus vaccine dose administered (up to 2 doses)

Vaccine and Testing Transportation

- Street Outreach, Standard Emergency Shelter, Temporary Emergency Shelter, Homelessness Prevention, and Rapid Rehousing
- Public transportation, employee vehicle, or agency vehicle
- Separate from other transportation services

Vaccinating the Homeless

CV-218 Vaccine Incentive Form

- For Vaccine Incentives and Vaccine and Testing Transportation
- Can be used in-place of CV-104 and CI-108 if **no other services are provided**
- Still need to be in HMIS and eligible

Disease Mitigation Budget Modification

Other Eligible Expenses – Street Outreach

Laundry Services

- Street Outreach under Hygiene Services
- Handwashing Stations and Portable Bathrooms → Hygiene Services
- Includes transportation of laundry (tracked separately from other transportation expenses)

Centralized and Coordinated Assessment

- Street Outreach
- Must be due to coronavirus-caused restraints and coordinated with CoC

Cellphones and Internet

- Street Outreach under Essential Services
- Normal Street Outreach → Essential Services
- Plan is in agency's name
- For housing purposes while receiving other assistance

Other Eligible Expenses – Homelessness Prevention and Rapid Rehousing

Essential Services from Shelter are Eligible

- Under Housing Relocation and Stabilization Services

Furniture and Household Furnishings

- Under Housing Relocation and Stabilization Services
- Must be returned when client stops receiving assistance

Personal Protective Equipment

- Under Housing Relocation and Stabilization Services

Renters Insurance

- Under Housing Relocation and Stabilization Services
- Must demonstrate it is necessary to obtain/maintain housing
- Pay directly to insurance company

New Rental Assistance

Subleases are eligible

Sponsor-Based Rental Assistance

- Agency has rental agreement with landlord
- Must be a separate municipality
- May sublease to client

Cover Rent between Tenants

- Up to 30 days while agency searches for client

Ineligible Expenses

Major Rehab

Renovation

Conversion

Acquisition

Fuel for Street-Legal Vehicles

- Mileage reimbursement going forward

Changes in Regulations

Literally Homeless Definition

- Is exiting an institution where they resided for ~~60~~ 120 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Housing Stability Case Management

- This assistance cannot exceed ~~30~~ 60 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing.

Housing Quality Standards

- Can be used in place of Habitability Standards for ESG-CV funded units

Limit on Services Removed

- No more than 24 months of services and/or rental assistance in 3 years is gone
- Medium-Term rental assistance has been raised from 12 months to 24 months

Budget Modifications

Prerequisites

- Must request and be approved for reimbursement of 100% of current award
- Must schedule/undergo a desk review or site visit

Process

1. Request additional funds by emailing official letter to aidan.rich@mhdc.com
2. Complete and submit CV-216 Modification Request form
3. Sign and return Budget Modification
4. Executed by MHDC

Disease Mitigation Budget Modification

Prerequisites

- Must request and be approved for reimbursement of 50% of current award

Eligible Activities

- Vaccine Incentives
- Vaccine and Testing Transportation
- Disease Mitigation Training
- Hygiene Services under Street Outreach
- Personal Protective Equipment (PPE)
- Hazard Pay
- Volunteer Incentives
- Administration and HMIS

Currently funded agencies can use existing funding for these expenses

Exceptional Need Budget Modification

Prerequisites

- Must expect to request reimbursement for more than current award within the month

Requirements

- Must submit CV-217 Spending Plan form with request
- Must request and be approved for reimbursement, in amount greater than previous award, in the first month
- Must request and be approved for reimbursement on monthly basis for following three months

Upcoming Schedule

Friday, August 20th

- Currently funded agencies can request Modifications and Amendments again

Friday August 27th

- ESG-CV Application will re-open to public with new guidance

Friday, September 3rd

- Agencies may request reimbursement for new eligible activities with new CV-212 and new guidance

Part II

ELIGIBLE COMPONENTS

Eligible Components

Street Outreach

Standard Emergency Shelter

Temporary Emergency Shelter

Homelessness Prevention

Rapid Re-Housing

<https://www.hudexchange.info/programs/esg/esg-requirements/>

Street Outreach - Eligible Expenses

Essential Services

- Engagement
- Housing-Focused Case Management
- Emergency Health Services
- Emergency Mental Health Services
- Transportation
- Cellphones and Internet
- PPE

Street Outreach - Eligible Expenses

Disease Mitigation Training

Hazard Pay

Volunteer Incentives

Vaccine Incentives

Vaccine and Testing Transportation

Centralized or Coordinated Assessment

Hygiene Services

Street Outreach - Eligible Clients

Literally Homeless

- Unsheltered Homeless Only

Street Outreach - Client Documentation

Agency's Initial Consultation/Intake Application

Homeless Status and Eligibility

- CV-104 Homeless Certification
 1. Third-Party
 2. Staff Observation
 3. Self Certify

Consent to Share Information

- CI-108 Consent Form
- CoC's HMIS Consent Form

Case Management Documentation

Street Outreach – DV Client Documentation

Agency's Initial Consultation/Intake Application

Homeless Status and Eligibility

- CV-104 Homeless Certification
 1. Third-Party
 2. Staff Observation
 3. Self Certify

Consent to Share Information

- CI-108-DV Consent Form

Case Management Documentation

Street Outreach – Vaccine Only Client Documentation

Client must be:

1. Receiving Vaccine Incentives, Vaccine and Testing Transportation, or both; and
2. Receiving no other ESG-CV services

Agency's Initial Consultation/Intake Application

Homeless Status and Eligibility **AND** Consent to Share Information

- CV-218 (pg. 4-6)
 1. Third-Party
 2. Staff Observation
 3. Self Certify

Standard Emergency Shelter & Temporary Emergency Shelter – Eligible Expenses

Essential Services

- Case Management
- Child Care, Education, Employment, and Life Skills Services
- Legal Services
- Health, Mental Health, and Substance Abuse Services
- Transportation
- PPE
- Housing Search, Placement, and Counseling Services*

Standard Emergency Shelter & Temporary Emergency Shelter – Eligible Expenses

Operations

- Minor or Routine Maintenance
- Rent
- Utilities
- Insurance
- Security
- Fuel
- Food for Shelter Residents
- Furniture and Furnishings
- Equipment
- Supplies
- Hotel or Motel Vouchers

Standard Emergency Shelter & Temporary Emergency Shelter – Eligible Expenses

Leasing*

Disease Mitigation Training

Hazard Pay

Volunteer Incentives

Vaccine Incentives

Vaccine and Testing Transportation

Standard Emergency Shelter & Temporary Emergency Shelter – Eligible Clients

Literally Homeless

Imminent Risk of Homelessness

Fleeing/Attempting to Flee Domestic Violence

Standard Emergency Shelter & Temporary Emergency Shelter – Client Files

Agency's Initial Consultation/Intake Application

Homeless Status and Eligibility

- CV-104 Homeless Certification
 1. Third-Party
 2. Staff Observation
 3. Self Certify

Consent to Share Information

- CI-108 Consent Form
- CoC's HMIS Consent Form

Case Management Documentation

Standard Emergency Shelter & Temporary Emergency Shelter – DV Client Documentation

Agency's Initial Consultation/Intake Application

Homeless Status and Eligibility

- CV-104 Homeless Certification
 1. Third-Party
 2. Staff Observation
 3. Self Certify

Consent to Share Information

- CI-108-DV Consent Form

Case Management Documentation

Standard Emergency Shelter & Temporary Emergency Shelter – Vaccine Only Client Documentation

Client must be:

1. Receiving Vaccine Incentives, Vaccine and Testing Transportation, or both; and
2. Receiving no other ESG-CV services

Agency's Initial Consultation/Intake Application

Homeless Status and Eligibility **AND** Consent to Share Information

- CV-218 (pg. 4-6)
 1. Third-Party
 2. Staff Observation
 3. Self Certify

Standard Emergency Shelter & Temporary Emergency Shelter – Building Files

Public Health Official Authorization (**Temporary Only**)

- CV-215 Temporary Emergency Shelter Status Verification

Habitability Standards (**Standard Only**)

- ESG-205 Habitability Standards Checklist (Shelter Version)

Lead-Based Paint Regulations

- ESG-207 Lead Screening Worksheet
- ESG-208 Property Owner Lead Certification Form (**if deemed necessary by ESG-207**)

Homelessness Prevention & Rapid Rehousing - Eligible Expenses

Housing Relocation and Stabilization Services

- Housing Search and Placement Services
- Housing Stability Case Management
- Mediation
- Legal Services
- Credit Repair
- PPE
- Renters Insurance
- Furniture and Household Furnishings
- Child Care, Education, Employment, and Life Skills Services
- Health, Mental Health, and Substance Abuse Services
- Transportation

Homelessness Prevention & Rapid Rehousing - Eligible Expenses

Financial Assistance

- Moving Costs
- Rent Application Fees
- Last Month's Rent
- Security and Utility Deposits
- Utility Payments
- Utility Arrears

Rental Assistance

- Short-Term Rental Assistance
- Medium Term Rental Assistance
- Rental Arrears

Homelessness Prevention & Rapid Rehousing - Eligible Expenses

Disease Mitigation Training

Hazard Pay

Volunteer Incentives

Landlord Incentives

Vaccine Incentives

Vaccine and Testing Transportation

Homelessness Prevention & Rapid Rehousing - Eligible Clients

Homelessness Prevention

- At Risk of Homelessness
- Imminent Risk of Homelessness
- Fleeing/Attempting to Flee Domestic Violence

Rapid Rehousing

- Literally Homeless
- Imminent Risk of Homelessness
- Fleeing/Attempting to Flee Domestic Violence

Homelessness Prevention & Rapid Rehousing – Client Files

Agency's Initial Consultation/Intake
Application

Social Security and Photo Identification

Proof of Need

Lease or Sublease

Homeless Status and Eligibility

- CV-104 Homeless Certification
 1. Third-Party
 2. Staff Observation
 3. Self Certify

Consent to Share Information

- CI-108 Consent Form
- CoC's HMIS Consent Form

Case Management Documentation

Homelessness Prevention & Rapid Rehousing – DV Client Documentation

Agency's Initial Consultation/Intake
Application

Social Security and Photo Identification

- CI-110 (**if agency was approved to use**)

Proof of Need

Lease or Sublease

Homeless Status and Eligibility

- CV-104 Homeless Certification

1. Third-Party
2. Staff Observation
3. Self Certify

Consent to Share Information

- CI-108-DV Consent Form

Case Management Documentation

Homelessness Prevention & Rapid Rehousing – Vaccine Only Client Documentation

Client must be:

1. Receiving Vaccine Incentives, Vaccine and Testing Transportation, or both; and
2. Receiving no other ESG-CV services

Agency's Initial Consultation/Intake Application

Homeless Status and Eligibility **AND** Consent to Share Information

- CV-218 (pg. 4-6)
 1. Third-Party
 2. Staff Observation
 3. Self Certify

Homelessness Prevention & Rapid Rehousing – Client Income Documentation

Only necessary for:

- Homelessness Prevention on intake
- Homelessness Prevention re-evaluation every 6 months
- Rapid Rehousing re-evaluation every year

Income for Adult Household Members

- CI-103 Self-Declaration of Income

Below 50% AMI

- CV-201 Income Eligibility Worksheet

Documentation of Income Sources

1. Third-Party
2. CI-112 Income Verification Worksheet (**if supporting documentation for CV-201 is unavailable**)

Re-Evaluation

- CV-209 - Recertification Form (**only for re-evaluation**)

Calculating Income

Determine all Sources of Income

- Inclusions
- Exclusions

Methods of Calculating Income

- Annualize income by calculating the gross annual income based on current circumstances.
- Calculate the annual income based on anticipated changes through the year
- Changes will be reflected at recertification period as required for each program

Homelessness Prevention & Rapid Rehousing - Unit Files

Lease or Sublease

Rental Assistance Agreement

Rent Reasonableness

- CV-206 Rent Reasonableness Certification

Habitability Standards

- ESG-205 Habitability Standards Checklist (Permanent Housing Version)
- Housing Quality Standards (HQS)

Lead-Based Paint Regulations

- ESG-207 Lead Screening Worksheet
- ESG-208 Property Owner Lead Certification Form (**if deemed necessary by ESG-207**)

Additional Pieces for Client Files

Ineligibility for each individual or family determined ineligible for ESG-CV program

Services and assistance provided to each program participant

Types and amounts of services and/or assistance provided

Compliance with termination of assistance requirement

Use of local coordinated entry system

Connecting participants to mainstream and other resources for supportive services

Housing plan for stability in permanent housing

Eligible Expenses – HMIS

Normal HMIS

- Hardware
- Software
- Staffing
- Training

Disease Mitigation Training

Eligible Expenses – Administration

Finances and Accounting

Human Resources

General Management

Contracting Third Parties for eligible services

Office Supplies

Indirect Rates

- Using [HUD guidelines](#)

Preparing MHDC forms and processes

- Amendment requests
- Modification requests
- Payment requests
- Compliance reviews
- Close-out documentation

Office Space

- Utilities
- Rent
- Insurance

Part III

PROGRAM ADMINISTRATION

Case Management

Case management services should be directed towards the housing stability needs of clients and include:

- Goal planning
- Prioritization of client needs
- Client progress

Documentation of client services and how agency is addressing the needs of clients and progress towards housing must be included in client files

Case management cannot be required to receive assistance, but it is required that the program offer services to clients and document frequent efforts of offering services

Resource Coordination

Coordination with homeless services and mainstream resources

Grantee will assist homeless individuals in obtaining permanent housing, appropriate supportive services, and other federal, state, local, and private assistance available for such individuals

Documentation of coordination efforts must be included in client files

Requirement outlined in [24 CFR 576.400 \(b\) and \(c\)](#)

Prioritization

Individuals and families with the greatest need receive priority for any type of assistance available

Grantees should have a prioritization policy to outline how clients most in need are prioritized for services

- Determined by the CoC's Coordinated Entry prioritization policy

Policies should be in place in order to ensure that ESG-CV funding is being utilized in the most effective service provision methods

Housing First

Reduce barriers that adversely impact the ability of programs to serve persons that need assistance the most

Eligibility criteria should not screen people out for assistance because of perceived barriers to housing, i.e.,

- lack of employment or income
- drug or alcohol use
- criminal record
- COVID-19

[Housing First Assessment Tool](#)

Coordinated Entry Participation

If any agencies in the CoC receive federal funding, the local continuum of care is required to operate a centralized or coordinated intake/assessment system

Agencies must utilize the intake tool identified by the CoC

Requirement outlined in [24 CFR 576.400 \(d\)](#)

Habitability Standards

Requirements outlined in [24 CFR 576.403](#)

- Structure and materials
- Access
- Space and security
- Interior air quality
- Water Supply
- Sanitary Facilities
- Thermal environment
- Illumination and electricity
- Food preparation
- Sanitary conditions
- Fire safety

Equal Access Rule

Nondiscrimination and equal opportunity

Individuals or groups of individuals regardless of age, gender identification, sexual orientation, or marital status must be served

Household identifying as a family at a family shelter must be served as a family

No inquiry or “proof” related to family status, gender identification and/or sexual orientation

Requirements outlined in [24 CFR 5.105\(a\)](#)

Involuntary Family Separation

Prohibition against involuntary family separation

The age of a child under 18 must not be used as a basis for denying any family's admission to or services of an ESG-CV funded program

Requirements outlined in [24 CFR 576.102\(b\)](#)

VAWA Protections

Survivors must not be denied assistance or terminated due to being a victim of domestic violence, dating violence, sexual assault, or stalking

Protections against adverse effects of abuse

Notification of VAWA protections to all applicants, program participants

Emergency transfer plan must be developed

Requirements outlined in [24 CFR 576.409](#)

Other Federal Requirements

Environmental Review

- MHDC will complete the Environmental Review form prior to ESG-CV funds being disbursed
- Requirements outlined in [24 CFR Part 576.407\(d\)](#)

Uniform Requirements

- Must comply with Uniform Administrative Requirements, Cost Principles, and Audit Requirements ([2 CFR Part 200](#))
- Requirements outlined in [24 CFR Part 576.407\(c\)](#)

Part IV

GRANT ADMINISTRATION

Financial Documentation

1. Proof of Need

- If a service or utility bill; it must list physical address of service (DV shelters can be exempt)
- Receipts must list eligible item(s) purchased, services performed, amount(s), and date(s)
- Assemble receipts, bills in order (preferably by payment date with corresponding invoice)

2. Proof of Cleared Payment

- Copy of cleared payment or bank statement clearly showing check number, date, and amount
- Payroll debits on bank statements must match payroll report total of net amount or copy of paystub
 - Timesheets
 - Last 4 digits of employees' SSN
- Employee benefits (insurance, taxes, work comp., etc.)

Required Financial Documentation

Supporting documentation for all costs charged to ESG-CV grant can be found in the ESG-CV Desk Guide

Street Outreach

- pg. 31

Standard Emergency Shelter

- pg. 43

Temporary Emergency Shelter

- pg. 55

Homelessness Prevention

- pg. 71

Rapid Rehousing

- pg. 87

HMIS

- pg. 91

Administration

- pg. 94

Compliance – Site Visit

May be a scheduled or unscheduled visit

Program and accounting staff need to be available

Information for review must be available in hard copy

- Client Files
- Financial Documentation
- Receipts, invoices, payroll, bank statements

Exit Interview

<http://www.mhdc.com/ci/compliance/index.htm>

Compliance – Desk Review

Essentially a “Virtual” Site Visit

Only scheduled

Information for review will be asked for in pdf format

- Client Files
- Financial Documentation
- Receipts, invoices, payroll, bank statements

<http://www.mhdc.com/ci/compliance/index.htm>

Compliance- Areas for Improvement

Missing required forms

Participants failing to disclose income information or inadequate intake application

Missing household eligibility documentation

Missing documentation of case management and housing stability goals

Utilizing net vs. gross income amounts and/or frequency of pay

Billing expenses incurred and/or paid outside grant period

Compliance - Findings

More than one-half of files reviewed during a site visit or desk review contained findings

Files were unable to be reviewed during the site visit or desk review

Files were not produced within 15 minute time frame for a site visit or 24 hours for a desk review

Grantee will not schedule site visit or desk review; after three attempts and no response from request sent within 15 days of date of request

Grantee accommodations deemed to be unsafe or unsanitary; allegations of clients being put in danger by grantee

Compliance - Out of Compliance

ESG-CV funding will be suspended

Corrective Action Plan (CAP)

Compliance Replacement Back-Up

If ineligible expenses are found during a site visit, replacement back up must be submitted

Items required in the back up:

- Replacement Backup form
- Copies of eligible expenses incurred within the grant period which have not previously been submitted for payment
- Bill, invoice or other proof of expense
- Proof of cleared payment
- Household eligibility documentation, i.e. income and homelessness, program consent form, and intake application.
- Corrected HMIS or comparable database report

HMIS/Comparable Database

Data on all persons served and activities assisted under ESG-CV must be entered into HMIS/comparable database

It is the responsibility of the grantee to ensure that all required data is compliant with [HMIS Data Standards](#)

Victim service provider or a legal services provider may use a comparable database

CAPERS

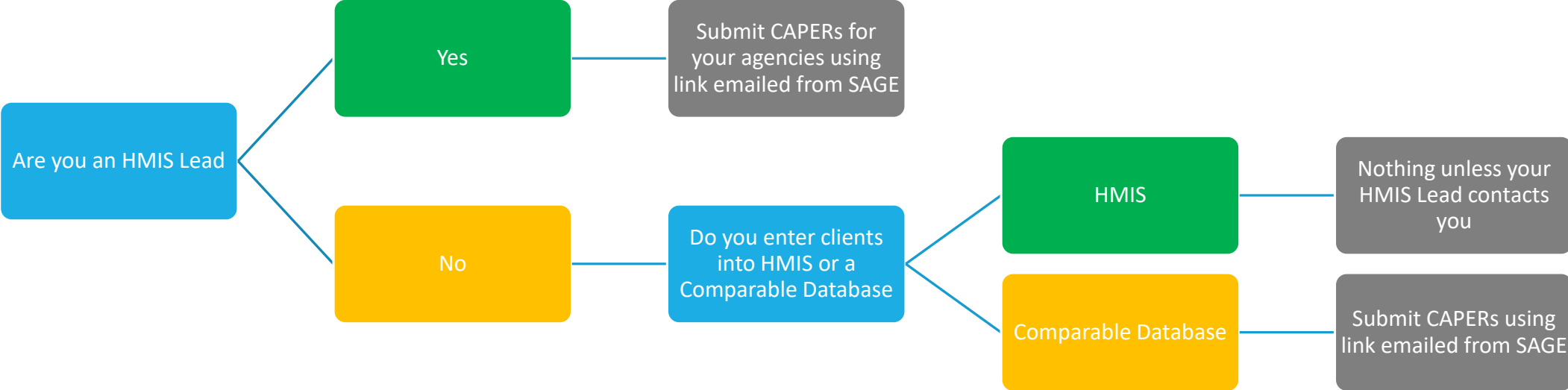
HMIS Lead agencies will submit two CAPERS on a quarterly basis for all Non-DV agencies in their CoC.

- Quarterly Consolidated Annual Performance Evaluation Report (QCAPER)
 - Beginning of Report Quarter – Ending of Report Quarter
- Cumulative Consolidated Annual Performance Evaluation Report (CCAPER)
 - Project Start date – Ending of Report Quarter

Agencies are responsible for correcting data issues and must work with HMIS Lead Agency to ensure both CAPERS are functioning properly.

DV Agencies submit both CAPERS directly into Sage themselves

CAPERS



Part V

FAIR HOUSING ACT

Fair Housing Act

Your agency should determine if any local rules, regulations, ordinances, or laws exist related to fair housing and are applicable to the project.

Your agency has an affirmative duty to comply with all local, state, and federal fair housing laws, including:

- The Federal Fair Housing Act:
 - <https://www.justice.gov/crt/fair-housing-act-2>
- The State of Missouri Human Rights statutes (RSMo § 213.040.1 et al.)
 - <http://revisor.mo.gov/main/Home.aspx>

Fair Housing Act

The Department of Housing and Urban Development

- Website: <https://portal.hud.gov/hudportal/HUD>
- Fair Housing and Equal Opportunity for All Brochure: https://portal.hud.gov/hudportal/documents/huddoc?id=FHEO_Booklet_Eng.pdf
- Fair Housing Poster: https://portal.hud.gov/hudportal/documents/huddoc?id=Fair_Housing_Poster_Eng.pdf
- Outreach Tools: https://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/marketing
- YouTube Channel*: <https://www.youtube.com/user/HUDchannel>

The Missouri Commission on Human Rights

- Website: <https://labor.mo.gov/mohumanrights>

Missouri Housing Development Commission

- Website: <http://mhdc.com/>
- Information and links are available by clicking on the Equal Housing Opportunity logo



*Please be aware that not all videos may have been posted by HUD.

Fair Housing Act

Questions regarding fair housing or your obligations may be directed to the following organizations:

- Kansas City Regional Office (HUD):

400 State Avenue, Room 200

Kansas City, KS 66101-2406

Phone: (913) 551-5462

- St. Louis Regional Office (HUD):

1222 Spruce Street, Suite 3.203

St. Louis, MO 63103-2836

Phone: (314) 418-5400

- Missouri Commission on Human Rights

3315 W. Truman Blvd., Rm 212

P.O. Box 1129

Jefferson City, MO 65102-1129

Phone: 573-751-3325

mchr@labor.mo.gov

Fair Housing Act

Although resources have been provided to assist in educating about the duty to comply with fair housing laws, it is important that you consult with your legal counsel to ensure that any project remains in compliance with fair housing laws at all times.

MHDC does not represent or warranty that the resources provided are current or accurate, only that they represent information available from other government agencies who provide education on and/or monitor compliance with fair housing laws.

At no time does MHDC certify your compliance with fair housing laws, through this presentation of information or otherwise, and MHDC assumes no responsibility or liability for your failure to comply with any fair housing law.

Contact Information

Aidan Rich

Grant Specialist

Missouri Housing Development Commission

920 Main Street, Suite 1400

Kansas City, MO 64105

(816) 759-6632

aidan.rich@mhdc.com

MHDC ESG-CV Program Information

<http://www.mhdc.com/ci/CARES/CARES%20ACT.htm>

