



**Missouri Housing**  
Development Commission

# 2025 Emergency Solutions Grant Program Funded Agency Training

**Drew Geer**

*Emergency Solutions Grant Program Administrator*



[MHDC.com](https://www.mhdc.com)

# Housekeeping

- This PowerPoint should be paired with the ESG 2025 Desk Guide, Finance training, and Compliance training
- All requisite ESG & MHDC forms can be found on the [MHDC website](#)
- Note all dates are subject to change
- MHDC envisions that grantee staff will use this resource as a reference and will keep referring back to specific sections as needed throughout the grant year



# Important ESG Contacts

- Drew Geer, ESG Program Administrator
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- Mandy Gosney, ESG Financial Administrator
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# Agenda

Part I: Grant Agreement Documents and Completion

Part II: Administering an ESG Funded Program

Part III: Funding Components & Eligible Activities

Part IV: Record Keeping Requirements

Part V: MHDC & Federal Funding Requirements



# ESG-25 Key Program Change – Taxes & Spending Deadline Changes

- Grantees should not be billing ESG for Federal Income Taxes (different than FICA) and should not be billing ESG for State or Local taxes that they have an exemption for. Meaning if your agency has Tax Exempt Status in Missouri you should not be getting charged Sales and Use Taxes and thus should not be billing them to ESG.
- There are no Quarterly Minimum Request Requirements in ESG-25 and there is only the 50% spending Deadline and the 100% Spending Deadline.



# ESG-25 Important Dates

- The ESG-25 Grant Year: **November 1<sup>st</sup>, 2024 – October 31<sup>st</sup>, 2025**
  - Quarter 1: **November 1<sup>st</sup>, 2024 – January 31<sup>st</sup>, 2025**
  - Quarter 2: **February 1<sup>st</sup>, 2025 – April 30<sup>th</sup>, 2025**
  - Quarter 3: **May 1<sup>st</sup>, 2025 – July 31<sup>st</sup>, 2025**
  - Quarter 4: **August 1<sup>st</sup>, 2025 – October 31<sup>st</sup>, 2025**
- Deadline to submit Grant Agreement: **Friday November 15<sup>th</sup>, 2024**





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# Part I

## Grant Agreement Documents and Completion

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# Grant Agreement Documents Overview

- Grant Agreement
- Riders
- Exhibits
- Attachments
- MHDC and ESG Forms
- Additional Documents
- Submission





# Grant Agreement

- Grant Agreement
  - Terms and requirements for grant
  - **Notarized, and requires original signatures**
  - Until all the pieces of the grant agreement are returned, no funds can be disbursed



# Grant Agreement: Riders

- Rider A: Additional Representations, Covenants, and Warranties by Grantee
  - Separated by program component
  - Outlines required documents for fund disbursement
  - Outlines required documents to maintain in grant year
- Rider B: Identity of Interest Restrictions
  - Conflict of Interest statement
  - Requires original signature



# Grant Agreement: Exhibits

- Exhibit 1: Workforce Eligibility Affidavit
  - Affidavit of Work Authorization
  - Notarized, requires original signatures
- Exhibit 2: Certification Regarding Debarment, Suspension, Ineligibility, and Voluntary Exclusion
  - Certifies agency eligibility to receive funds
  - Requires original signature



# Grant Agreement: Exhibits

- Exhibit 3: ESG Program Certifications
  - Certifies agency will account for ESG funds separately
  - Certifies agency has provided accurate information
  - Requires original signature
- Exhibit 4: ESG Information
  - Outlines federal funds obligation from HUD to MHDC



# Grant Agreement: Attachments

- Attachment B: FFATA
  - Promotes transparency of Federal Funding uses
  - Requires original signature



# Grant Agreement: MHDC Forms

- MHDC-100 Direct Deposit Form
  - Blank Voided Check
- MHDC-101 Authorized Signature Form
  - Signatures for all ESG documents
  - Authorizing official of this form must also be a signee



# Grant Agreement: ESG Forms

- ESG-200 Program Guidelines Certification & Attachment
  - ESG grantees must have created and implemented program guidelines that address all applicable requirements specified in 24 CFR 576.400(e)
  - This form must be completed and attached to a document that includes the grantees actual policies and procedures as they apply to the required standards



# Grant Agreement: Grant Interface Parts

- Environmental Review Question
  - Certification of exemption from Environmental Review Activities
- Agency Contact Page
  - Grant, Financial, Executive Director Contact
  - Payment request Assignee





# Grant Agreement: Additional Documents

- Certificate of Insurance
  - Current Liability Insurance coverage
- United Way 211 Registration
  - Agency profile print out from United Way 211 website
- Complete E-Verify MOU
  - Full MOU including electronic signature
- HMIS/Comparable Database Letter
  - For new Agencies and those that use a comparable database



# Grant Documents: Submission

- Before submitting grant documents ensure:
  - All grant document signatures are originals
  - All grant document signatures are also signees on the Authorized Signature Card
  - Any grant document notary is not a signee on any grant document
  - All required documents on the grant documents checklist are completed
  - Grant agreement is submitted electronically
- **Grantee is responsible for reviewing and understanding contents of grant agreement**



# Grant Agreement: Submission

- Grant Agreement
- Rider A
- Rider B
- Exhibit 1
- Exhibit 2
- Exhibit 3
- Exhibit 4
- Attachment B
- MHDC-100: Direct Deposit Form
- MHDC-101: Authorized Signature Card
- ESG-200: Program Guidelines Certification
- Agency Program Guidelines
- Environmental Review
- Blank Voided Check
- Certificate of Insurance
- E-Verify MOU
- United Way 211 Registration
- Current Certificate of Insurance
- Environmental Review Question
- Letter from HMIS Lead
- Agency Contact Page
- Mid-Year Caper Contact



# Grant Agreement: Submission

- **Submission Deadline: Friday November 15<sup>th</sup>, 2024**
  - All Grant agreements shall be submitted via Grant Interface through the follow up form process
  - Each form will need to be uploaded as a PDF
  - There is an upload button to submit every Grant Agreement document in Grant Interface
  - If issues occur from PDFs being too large please optimize the PDF into a smaller format



# Grant Agreement: Communication

Drew Geer

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# Part II

## Administering an ESG Funded Program



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# Initial Participant Evaluation

- Grantees must conduct an initial evaluation of eligibility for all potential program participants. The purpose of this evaluation is to determine the following:
  - Each individual or family's eligibility for ESG activities
  - The applicant has no appropriate subsequent housing options
  - The applicant lacks sufficient resources and support networks to obtain/retain housing
  - The minimum amount and types of assistance necessary to ensure housing stability
  - The applicants total household income (only applicable for Homelessness Prevention)
  - The applicant has not received more than 24 months of ESG assistance within the past three years



# Verifying Homelessness Status at Intake

- Agency's intake procedures must ensure compliance with homeless and at-risk of homelessness definitions. The procedures must require documentation at intake of the evidence relied upon to establish and verify homeless status. The procedures must establish the order of priority for obtaining evidence as:
  1. Third-party documentation
  2. Intake worker observation
  3. Self-certification from client seeking assistance





# Verifying Homelessness Status at Intake Cont.

- All grantees **must** utilize the MHDC-114 form at intake to document homeless status
- If a lower priority certification method is utilized then the agency staff must document by a written certification their efforts in attempting to obtain the higher priority certification method(s)
- Lack of third-party documentation should not prevent a household from being immediately admitted to shelter, receiving street outreach services, or from receiving victims' services and shelter

# Homelessness Definition Documentation (Category 1)

## Literally Homeless

1. Written referral by another housing/service provider (i.e., Coordinated Entry referral, other agency referral letter)
2. Written observation by the outreach worker of the conditions where the individual or family was living
3. Certification by the head of household seeking assistance stating they were living on the streets or in shelter



# Homelessness Definition Documentation (Category 2)

## Imminent Risk of Homelessness

1. A court order resulting from an eviction action notifying the household they must leave
  - a) For households leaving a hotel/motel: the source documents must show that the program participant does not have sufficient resources (Notice of employment termination, unemployment compensation statement, bank statement)
2. A written certification by the owner/renter of the housing in which the program participant currently resides, attained/verified by the intake worker, stating they will not allow them to stay
3. A documented and verified oral statement
  - a) Certification that no subsequent residence has been identified; and
  - b) Self-certification or other written documentation that the household lacks financial resources and support necessary to obtain permanent housing.



# At Risk of Homelessness (Category 1) Documentation Definition

- Evidence that participant's annual income does not exceed 30% AMI
- Source documents showing that the program participant lacks sufficient resources or support networks to prevent them from becoming homeless
- If source documents are unavailable then the following order of priority for obtaining evidence must be followed:
  1. Written verification by the relevant third party (e.g., former employer, public administrator, relative)
  2. Written certification by the outreach worker of the oral verification by the third party
  3. If third-party verification is unobtainable a written statement by staff describing the efforts taken to obtain the evidence is required



# At Risk of Homelessness (Category 1)

## Documentation Definition Cont.

Source documents showing the program participant meets at least one condition of “at risk of homelessness”

- If source documents are unavailable then the following order of priority for obtaining evidence must be followed:
  1. Written verification by relevant third-party (i.e., former employer, primary leaseholder, public administrator, hotel manager, etc.)
  2. Written certification by the outreach worker of the oral verification by the third party
  3. If third-party verification is unobtainable, a written statement by intake staff that the staff person has visited the applicant's residence and determined that the applicant meets one or more of the criteria

# Homelessness Definition Documentation (Category 4)

## Fleeing/Attempting to Flee Domestic Violence

- If the individual or family is fleeing domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions related to violence, then acceptable evidence includes:
  - An oral statement by the individual or head of household seeking assistance that they are fleeing that situation, stating that no subsequent residence has been identified and that they lack the resources or support networks



# Re-Evaluating Participant Eligibility

- In addition to conducting an initial evaluation and connecting program participants to other resources, eligibility for ESG Homelessness Prevention and Rapid Rehousing must be re-evaluated utilizing the ESG-209:
  - At least once every three months for Homelessness Prevention assistance
  - At least once annually for Rapid Rehousing assistance
- At a minimum, the re-evaluation must establish that:
  - The household's annual income is not greater than 30 percent of the AMI (ESG-201)
  - The program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance



# Connecting Program Participants to Mainstream and Other Resources

- 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
- Other federal, state, local, and private assistance available to assist the program participant in obtaining housing stability, including:
  - Medicaid
  - Supplemental Nutrition Assistance Program
  - Women, Infants and Children (WIC)
  - Federal-State Unemployment Insurance Program
  - Social Security Disability Insurance (SSDI)
  - Supplemental Security Income
  - Child and Adult Care Food Program
  - Other assistance available under the programs listed in [24 CFR 576.400\(c\)](#)





# Minimum Habitability Standards

## Emergency Shelter and Permanent Housing Standards

- All emergency shelters and any unit assisted with funds must meet basic 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



# Involuntary Family Separation

- Per [24 CFR 576.102\(b\)](#), HUD-funded shelters and assisted housing are prohibited from causing 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 funded program



# Reports: Consolidated Annual Performance Evaluation Report (CAPER)

- Grantees are required to work with their HMIS lead agency to generate data through a CAPER CSV export from their HMIS/Comparable once annually
- The report must cover the period of April 1<sup>st</sup>, 2024 - March 31<sup>st</sup>, 2025
  - Submitted electronically to SAGE via email link
  - **Due April 28<sup>th</sup>, 2025**
- CAPER Report is not provided by MHDC, it is programmed into HMIS or Comparable Database



# Reports: Quarterly Consolidated Annual Performance Evaluation Report (CAPER)

- The HMIS lead agency for each CoC will submit Quarterly CAPER reports to MHDC on behalf of the agencies they serve
  - Grantees are responsible for correcting data issues and must work with HMIS Lead Agency to ensure their quarterly CAPER is functioning properly
- Grantee's using comparable databases must submit their own individual CAPERS for each ESG component for which they are funded directly to MHDC
  - All quarterly CAPERs must be submitted quarterly no later than the 10th day following the end of each quarter



# Spending Deadlines, Quarterly Minimums, and Recapture

- Grantees must spend at least:
  - 50% of their total grant by April 30<sup>th</sup>, 2025
- MHDC has the discretion to recapture a portion or all remaining ESG funds as of these deadlines.
- Payment Requests that result in a “discard” do not fulfill the 50% Spending Deadline



# Grant Close Out

- Once 100% of awarded funds have been expended, the grantee is required to close out their grant
- Grant Close-Out Documents consist of:
  - MHDC-107 - CoC Participation Form
  - ESG-210 - Match Certification Documentation
  - Homeless Participation Certification
- All grant closeout documentation must be submitted electronically via the [Grant Interface](#) on or before **11:59 p.m. on December 1<sup>st</sup>, 2025**





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# Part III

## Funding Components & Eligible Activities

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# Eligible Components

- Street Outreach (SO)
- Emergency Shelter (ES)
- Homelessness Prevention (HP)
- Rapid Rehousing (RRH)
- Homeless Management Information Systems (HMIS)
- Administration





# Street Outreach Eligibility

- Focused on serving those populations that fit the HUD definition of “unsheltered homeless” under Category 1: Literally Homeless
  - Individual or family who lacks a fixed, regular, and adequate nighttime residence:
    - Has a primary nighttime residence that is a public or private place not meant for human habitation; including a car, park abandoned building, bus or train station, airport, or camping ground
- The goal is to reach out to this population and meet them where they are to provide essential services
- Income requirements do not apply to program participants who are being served under the Street Outreach component



# Eligible Street Outreach Activities

- Essential Services
  - Engagement
  - Housing-Focused Case Management
  - Emergency Health Services
  - Emergency Mental Health Services
  - Transportation Services
  - Services for Special Populations



# Emergency Shelter Eligibility

- For those currently staying in an emergency shelter
- Emergency Shelter services are provided to persons who meet HUD's Category 1, 2, or 4 status of homelessness
  1. Literally Homeless
  2. Imminent Risk of Homelessness
  4. Fleeing/Attempting to Flee Domestic Violence
- Income requirements do not apply to program participants who are being served under Emergency Shelter component



# Eligible Emergency Shelter Activities

## ■ Essential Services

- Case Management
- Childcare
- Education Services
- Employment Assistance and Job Training
- Outpatient Health Services
- Legal Services
- Life Skills Training
- Mental Health Services
- Substance Abuse Treatment Services
- Transportation Services
- Services for Special Populations



# Eligible Emergency Shelter Activities Cont.

- Operations

- Minor or Routine Maintenance
- Rent
- Security
- Insurance
- Utilities

- Food for Shelter Residents
- Furniture and Furnishings
- Equipment and Supplies
- Hotel or Motel Vouchers (*\*when no appropriate Emergency Shelter is available*)



# Homelessness Prevention Eligibility

- To prevent households from becoming homeless and to regain stability in current or other permanent housing
- Participants must meet:
  - Homeless Definition (2): Imminent Risk of Homelessness
  - Homeless Definition (4): Fleeing/Attempting to Flee Domestic Violence
  - At-risk of Homelessness Definition (1): At Risk of Homelessness
- Participants must have an annual income below 30 percent (30%) of area median income (AMI), as determined by HUD, at initial evaluation, and all re-evaluations



# Rapid Rehousing Eligibility

- Focuses on people who are literally homeless or attempting to flee Domestic Violence. The goal is to house the individual as quickly as possible
- Participants must meet:
  - Homeless Definition (1): Literally Homeless
  - Homeless Definition (4): Fleeing/Attempting to Flee Domestic Violence
- No income evaluation required upon initial evaluation. Upon annual re-evaluation, the individual or family must have an annual income that is at or below 30 percent (30%) of the area median income, as determined by HUD



# Eligible Homelessness Prevention & Rapid Rehousing Activities

- Housing Relocation and Stabilization Services
  - Housing Search and Placement Services
  - Housing Stability Case Management
  - Mediation
  - Legal Services
  - Credit Repair





# Eligible Homelessness Prevention & Rapid Rehousing Activities Cont.

## ■ Financial Assistance

- Moving costs
- Rental Application Fees
- Last Month's Rent
- Security Deposit
- Utility Deposits
- Utility Payments
- Utility Arrears

## ■ Rental Assistance

- Short-Term Rental Assistance
  - Up to 3 months
- Medium-Term Rental Assistance
  - Between 2-24 months
- Rental Arrears
  - Up to 6 months if arrears



# Eligible HMIS Activities

- Homeless Management Information System (HMIS) or comparable database participation is a requirement of receiving ESG funds. Therefore, costs associated with contributing data to the HMIS or comparable database are eligible for reimbursement ([24 CFR 576.107](#)), such as:
  - Hardware and Software
  - Staffing
  - Training
  - Transportation
  - Rent
  - Utilities
  - Equipment and Supplies
  - Participation Fees



# Eligible Administration Activities

- Intended to support Grantee's costs incurred to meet the grant requirements ([24 CFR 576.108](#)). ESG grantees may receive up to five percent (5%) of grant award for administrative costs if funded under the Administration component. Eligible activities include:
  - Indirect Cost Rate
  - Insurance
  - Staffing
  - Equipment and Supplies
  - Third-Party Administration and Accounting
  - Training and Travel
  - Rent
  - Utilities





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# Part IV

## Record Keeping Requirements



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# Grant Administration Forms

- MHDC provides forms for grantees to assist in meeting the program requirements as well as the documentation requirements of administering the ESG program
- Each documentation requirement as specified in the CFR, ESG-24 Desk Guide must be clearly present in each client file, whether or not a specific form is provided by MHDC
- There are two forms that are uniformly required for every client file to have regardless of which component they are receiving services under:
  - MHDC-114 (Consent and Homeless Certification Form)
  - Consent for information to be entered into the HMIS/comparable database



# MHDC and ESG Forms

- MHDC-100 Direct Deposit Form
- MHDC-101 Authorized Signature Card
- MHDC-107 CoC Meeting Attendance Tracking Sheet
- MHDC-113 Street Outreach Engagement Form
- MHDC-103 Self-Declaration of Income
- MHDC-112 Verification of Income
- MHDC-114 Consent and Homeless Certification
- ESG-200 Program Guidelines Certification
- ESG-201 Income Eligibility Worksheet
- ESG-204 Receipt of Assistance
- ESG-205 Habitability Standards Checklist (ES)
- ESG-205 Habitability Standards Checklist (HP/RRH)
- ESG-206 Rent Reasonableness and FMR Certification
- ESG-207 Lead Screening Worksheet
- ESG-208 Property Owner Lead Certificate
- ESG-209 Recertification Form
- ESG-210 Match Certification
- ESG-212 Expense Detail Form



# Recordkeeping Requirements: Street Outreach Program Participants

- Grantees must keep the following records in SO client files:
  - Initial evaluation to determine the eligibility of each client for the ESG program
  - Homeless status documentation & MHDC-114
    - Lack of third-party documentation must not prevent an individual or family from receiving street outreach services
  - Case management documentation
    - Assessing, arranging, coordinating, and monitoring delivery of services to facilitate housing stability
    - Notes must be dated and detail housing goals, plans, and referrals



# Recordkeeping Requirements: Emergency Shelter Program Participants

- Grantees must keep the following records in ES client files:
  - Initial evaluation to determine the eligibility of each client for the ESG program
  - Homeless status documentation & MHDC-114
    - Lack of third-party documentation must not prevent an individual or family from receiving emergency shelter services
  - Case management documentation
    - Assessing, arranging, coordinating, and monitoring delivery of services to facilitate housing stability
    - Notes must be dated and detail housing goals, plans, and referrals
  - Documentation of any connection of participants to mainstream and other resources for supportive services
  - Detailing use of local coordinated entry system





# Recordkeeping Requirements:

## Homelessness Prevention & Rapid Rehousing Program

### Participants

- Grantees must keep the following records in HP & RRH client files:
  - Initial evaluation to determine the eligibility of each client for the ESG program
    - Income verification documentation
    - Photo ID & Social Security Information
    - Homeless/At-risk of homelessness status documentation & MHDC-114
  - Proof of clients need for assistance
    - Utility bills, arrears, eviction documentation, etc.
  - Case management documentation
    - Assessing, arranging, coordinating, and monitoring delivery of services to facilitate housing stability
    - Notes must be dated and detail housing goals, plans, and referrals
  - Certification of receipt of ESG assistance from participant (ESG-204)
  - Proof of payment of any rental and financial assistance
    - Documented with canceled checks, bank statements, or check registers



# Recordkeeping Requirements:

## Homelessness Prevention & Rapid Rehousing Program

### Participants: Housing Documentation

- Grantees must keep the following housing records in Homelessness Prevention and Rapid Rehousing client files:
  - Lease between the landlord and program participant
  - Rental Assistance agreement between your agency and the landlord
    - Applicable only to households receiving Rental Assistance
  - Habitability Standards for Permanent Housing (ESG-205)
  - Lead-Based Paint Inspection Documentation (ESG-207 & ESG-208 as applicable)
  - Certification the assisted unit is the lesser of FMR or Rent Reasonableness
    - ESG-206 to be used to calculate rent reasonableness
    - Current FMR Standards: <https://www.huduser.gov/portal/datasets/fmr.html>



# Additional Inclusions for Client Files

- Ineligibility for each individual or family determined ineligible for ESG program
- Services and assistance provided to each program participant
- Types and amounts of services and/or assistance provided
- Compliance with termination of assistance requirement
- Connecting participants to mainstream and other resources for supportive services
- Housing plan for stability in permanent housing





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# Part V

## MHDC & Federal Funding Requirements



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# Fair Housing

- The goal of affirmatively furthering fair housing is to help bring an end to discriminatory housing practices, both past and present, which directly impact fair access and equal opportunity to safe and affordable housing. MHDC requires all grantees to abide by the following:
  - Affirmative Outreach
    - Grantees must communicate and make known that use of ESG funded facilities, assistance, and services are available to all on a nondiscriminatory basis
    - Reasonable accommodations for persons with disabilities must be available to ensure disabled participants have an equal opportunity to utilize housing, including shelters, and receive essential services



# Fair Housing Cont.

## ■ Nondiscrimination

- ESG grantees are required to comply with all state and federal statutes relating to nondiscrimination and cannot take any of the following actions based on race, color, religion, sex, national origin, familial status, or disability:
  - Refuse to rent housing or provide services
  - Make housing or services unavailable
  - Deny a dwelling or service
  - Set different terms, conditions, or privileges for rental of dwelling or obtaining services
  - Provide different housing services or facilities or different services
  - Falsely deny that housing is available for inspection or rental or that services are available
  - Deny anyone access to a facility or service



# Homeless Participation

- Grantees must have at least one homeless or formerly homeless individual on their board of directors or other equivalent policy-making entity
  - If unable to meet requirement, grantee must instead develop and implement a plan to consult with homeless or formerly homeless individuals in considering and making policies and decisions regarding ESG
- Grantees must involve homeless individuals and families in operating facilities assisted under ESG, in providing services assisted under ESG, and in providing services for occupants of facilities assisted under ESG



# Grantee Internal Program Guidelines

- Each grantee must have written policies and procedures that address:
  - The written standards required by HUD to provide ESG assistance, as defined in [24 CFR 576.400](#)
  - The required standards for each of the program components that your agency is funded (SO, ES, HP, RRH), as listed on the Program Guidelines Certification Form (ESG-200)





# Homeless Management Information System HMIS/Comparable Database

- Grantees are required to enter data on all persons served activities assisted into the HMIS recognized by their Continuum of Care (CoC) for:
  - Street Outreach
  - Emergency Shelter
  - Homelessness Prevention
  - Rapid Rehousing
- Grantees serving victims of domestic violence are required to enter data into a “comparable database” in accordance with HUD’s standards on participation, data collection, and reporting
- It is the responsibility of the grantee to ensure that all required data is compliant with HUD’s [HMIS Data Standards](#)



# Program Administration: Violence Against Women Act (VAWA) Protections

- The Violence Against Women Reauthorization Act of 2013 prohibits denial of or termination of assistance solely due to an individual/family being a victim of domestic violence, dating violence, stalking, or sexual assault
  - Program participants have the right to emergency transfers for victims who are in fear for their life and safety to move to housing that they deem safe
    - ESG funds may be used to pay amounts owed for breaking lease to effect an emergency transfer
- Grantee's must ensure that all leases include a provision or incorporate a lease addendum that includes all requirements that apply to tenants, the owner, or lease under [24 CFR 5 Subpart L](#) (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking)
- All ESG rental assistance applicants must be informed of their rights under VAWA using HUD's Notification of Occupancy Rights at application, denial, or termination of assistance, and at notification of eviction



# Matching Funds

- As described in [24 CFR 576.201](#) all grantees must provide a 100% match to supplement the their total ESG grant award; consisting of documented **non-McKinney resources**
  - Matching funds must be used in accordance with all requirements that apply to ESG funds (e.g., documentation, participant eligibility, eligible costs)
  - Contributions used to match a previous ESG grant may not be used to match a subsequent ESG grant
  - Contributions that have or will be counted as a matching requirement of another federal grant/ award may not be used to match an ESG award
- Match may include cash and/or non-cash contributions, including:
  - The value of any lease on a building
  - The actual value of professional services
  - Any salary paid to staff to carry out the program
  - The value of the time and services contributed by volunteers to carry out the program
- Matching funds must be expended within ESG-25 grant period

# Area-Wide Systems Coordination:

## Coordination with other Housing Services and Mainstream Resources

- Agencies must coordinate and integrate ESG activities with mainstream:
  - Housing programs
  - Health programs
  - Social programs
  - Employment programs
  - Education programs
  - Youth programs
  - Programs targeted to homeless people in their service area
- In order to provide a strategic, community-wide system to prevent and end homelessness
- Requirement outlined in [24 CFR 576.400\(b\)\(c\)](#)



# Area-Wide Systems Coordination: Coordinated Entry Participation

- All ESG-funded non-victim services provider agencies must use their CoC's assessment system to ensure consistent screening, assessment, prioritization, and referral of program participants
- Victim services providers may choose not to use the Continuum of Care's coordinated entry system
- Requirements outlined in [24 CFR 576.400\(d\)](#)



# HUD Equal Access Rule

- The admissions, occupancy, operating, privacy, health, safety, and security policies/procedures of grantees must be administered in a nondiscriminatory manner
  - Individuals or groups of individuals regardless of age, gender identification, sexual orientation, or marital status must be served
    - An individual must be placed, served, and accommodated in accordance with the gender identity of the individual
  - Any 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 may be requested
    - An individual must not be subjected to intrusive questioning or asked to provide anatomical information or documentary, physical, or medical evidence of the individual's gender identity
- Requirements outlined in [24 CFR 5.105\(a\)](#)



# Housing First

- Connecting people experiencing homelessness to permanent housing swiftly and with few to no treatment preconditions, behavioral contingencies, or other barriers
  - Reduce barriers that adversely impact the ability of programs to prioritize rapid placement and stabilization
  - 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
- Housing First Assessment Tool:
  - <https://www.usich.gov/tools-for-action/housing-first-checklist>



# Program Administration: Other Federal Requirements

- Environmental Review
  - MHDC will complete the Environmental Review form prior to ESG funds being disbursed
  - Requirements outlined in [24 CFR Part 576.407\(d\)](#)
- Uniform Requirements
  - Financial management requirements when receiving federal funding
  - Must comply with Uniform Administrative Requirements, Cost Principles, and Audit Requirements ([2 CFR Part 200](#))
  - Requirements outlined in [24 CFR Part 576.407\(c\)](#)





# Contact Information

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MHDC ESG Program Information

<https://mhdc.com/programs/hud-programs/emergency-solutions-grant/>

