

# 2023 Emergency Solutions Grant Program **Funded Agency Training**

Drew Geer

*Emergency Solutions Grant Program Administrator*

# Housekeeping

- This PowerPoint should be paired with the ESG 2023 Desk Guide, Finance training, and Compliance training
- Note all dates are subject to change
- There will be additional trainings released that cover the financial and compliance aspects of the ESG program in the coming weeks

# Important ESG Contacts

- Drew Geer, ESG Program Administrator
  - [drew.geer@mhdc.com](mailto:drew.geer@mhdc.com)
  - 816-759-6630
  - Program technical assistance, budget amendments, general inquires/eligibility questions
- Brendan Irving, ESG Financial Administrator
  - [brendan.irivng@mhdc.com](mailto:brendan.irivng@mhdc.com)
  - 816-759-2875
  - Payment requests technical assistance, grant interface questions, ESG-212 inquires

# Agenda

Part I:	<u>Grant Agreement Documents</u>
Part II:	<u>Program Administration</u>
Part III:	<u>Grant Administration</u>
Part IV:	<u>Fair Housing Act</u>

# Emergency Solutions Grant 2023 Key Program Changes at a Glance

- Agencies can now submit two payment requests per month.
  - The 15th and the end of the month
- Acceptable payment types clarified and added to the Desk Guide
- When billing for transportation agencies must utilize a mileage rate calculation and keep travel logs for compliance.
- No purchase of a fixed asset that costs in excess of \$5,000.00 in total can be billed for reimbursement with ESG funds.

# Emergency Solutions Grant Program

## Operational Structure

- ESG-23 is funded by a combination of Annual ESG funds and ESG-CV funds.
  - While ESG-23 is being funded partially with ESG-CV funds, none of the ESG-CV waivers will be applicable. The program will be run under regular ESG regulations.
- There will be no NOFA for additional ESG-CV funds in 2023. All allocated and recaptured ESG-CV funds have been folded into ESG-23
- The ESG-23 Grant Year is November 1<sup>st</sup>, 2022 – October 31<sup>st</sup>, 2023

# Part I

## Grant Agreement Documents

# 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 DSS 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
  - Certifies the agency has completed Program Guidelines
  - Requires original signature
  - Please upload only guidelines specific to ESG program. Do not upload entire handbook or staff guidelines. ESG-200 can be found on the MHDC website.
  - Highlight program guidelines showing ESG-200 standards have been included in program guidelines.
- Environmental Review
  - Certification of exemption from Environmental Review Activities
- Site Contact Form
  - 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
  - Any grant document signatures are also a signee 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 ICA
- Site Contact
- Mid-Year Caper Contact

# Grant Agreement : Submission

- 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

- (816) 759-6630
- [drew.geer@mhdc.com](mailto:drew.geer@mhdc.com)

# Part II

## Program Administration

# Program Administration: 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.
- 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.

# Program Administration: 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.

# Program Administration: 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 to show 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; and
  - 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.



# Program Administration: At Risk of Homelessness Documentation Definition

## At Risk of Homelessness

Evidence that participant's annual income does not exceed 30% AMI; and

Source documents showing that the program participant lacks sufficient resources or support networks to prevent them from being coming homeless; and

- 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.

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

# Program Administration: 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

# Program Administration: Eligible Components

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

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

# Eligible Beneficiaries – Street Outreach

- Focused on serving those populations that fit the HUD definition of 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 Expenses – Street Outreach

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

# Eligible Beneficiaries – Emergency Shelter

- 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 Expenses – Emergency Shelter

- 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 for Special Populations

# Eligible Expenses – Emergency Shelter

- Operations
  - Minor or Routine Maintenance
  - Rent
  - Security
  - Insurance
  - Utilities
  - Food for Shelter Residents
  - Furniture and Furnishings
  - Equipment
  - Supplies
  - Hotel or Motel Vouchers (*\* when no appropriate Emergency Shelter is available*)



# Eligible Beneficiaries – Homelessness Prevention

- 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 annual income below 30 percent (30%) of area median income (AMI), as determined by HUD, at initial evaluation, and all re-evaluations.

# Eligible Beneficiaries – Rapid Rehousing

- 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 Expenses – Homelessness Prevention & Rapid Rehousing

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

# Eligible Expenses – Homelessness Prevention & Rapid Rehousing

## ■ Financial Assistance

- Moving costs
- Rental Application Fees
- Last Months Rent
- Security and 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 Expenses – HMIS

- Computer hardware, equipment, and software costs
- Staffing
- Training staff on the use of HMIS/Comparable Database
- Staff Travel to conduct intake
- Participation fees charged by HMIS Lead Agency

# Eligible Expenses – Administration

- General Management, Oversight, and Coordination
  - Salaries, wages, and related costs of the grantee's staff, or other staff engaged in any program administration assignments as defined by [24 CFR 576.108\(a\)\(1\)\(i\)](#)
  - Administrative services performed under third party contracts or agreements are also eligible
- Goods and services required for administration of the program are also eligible, including:
  - Rental or purchase of equipment
  - Office supplies
  - General liability insurance
  - Utilities for office space
  - Rental of office space
  - Maintenance of office space
  - Indirect Rates
    - Using [HUD guidelines](#)

# Program Administration: Forms

- MHDC provides forms for agencies 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-23 Desk Guide must be clearly present in each client file, whether or not a specific form is provided by MHDC
- There are 2 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)
    - Replaced CI-108 & CI-104
  - Consent for information to be entered into the HMIS system
    - This should be provided by your HMIS provider or Lead Agency

# MHDC and ESG Forms

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

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



# 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

# Program Administration: 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: Habitability Standards

## Shelter and 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

# Program Administration: Equal Access

- 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 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\(a\)](#)

# Program Administration: 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

# 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)
  - As supplemented by [24 CFR 576.409](#)
  - Including the prohibited bases for eviction and restrictions on construing lease terms
- 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.

# 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)

# Part III

## GRANT ADMINISTRATION



# 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](#).

# **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

# **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 should cover the period of April 1, 2022 through March 31, 2023
  - Submitted electronically to SAGE via email link
  - **Due April 28, 2023**
- CAPER Report is not provided by MHDC, it is programmed into HMIS or Comparable Database

# 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; and
  - the value of the time and services contributed by volunteers to carry out the program.
- Matching funds must be expended within ESG-23 grant period

# Area-Wide Systems Coordination:

## Consultation with Continuums of Care

- Required to attend at least 75 percent of local Continuum of Care meetings
  - Document on MHDC-107
- Participation tracking sheet required at grant closeout
  - Agency responsibility to get CoC representative signature in a timely manner
  - Agency should keep track and document canceled meetings
- CoC feedback to MHDC on agency participation may be assessed on future ESG applications for funding
  - CoC feedback can include: attendance at meetings, participation on committees, leadership for other activities (PITC, CE, PHC), etc.

# 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; and
  - 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\(d\)\)](#)

# Recordkeeping Requirements:

## 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](#))
    - Examples guidelines can be found on the MHDC website



# 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 being immediately admitted to emergency shelter, 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, 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 being immediately admitted to emergency shelter, 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, 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, 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, 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 Inspection form (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>

# Spending Deadlines, Quarterly Draws, and Recapture

- Grantees must spend at least:
  - 50% of their total grant by April 30<sup>th</sup>, 2023
  - 75% of their total grant by July 31<sup>st</sup>, 2023
- MHDC has the discretion to recapture a portion or all remaining ESG funds as of these deadlines.
- Grantees must have a minimum of one disbursement of funds per quarter
  - Payment Requests that result in a “discard” do not fulfill the Quarterly Draw requirements
- Missing a spending deadline or failing to have one successful payment request per quarter will result in a demerit on the grantees ESG-24 application applications

# 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
  - Consolidated Annual Performance and Evaluation Report (CAPER)
- All grant closeout documentation must be submitted electronically via the [Grant Interface](#) on or before 11:59 p.m. on December 1, 2023.
  - Any funds that are not expended will be recaptured.

# Part VI

## 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

- Additional information regarding compliance with fair housing may be located at the following:
- 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](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](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](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

# 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.

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MHDC ESG Program Information

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

