



DESK GUIDE

CARES Act
Coronavirus
Emergency Solutions
Grant (ESG-CV)



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INTRODUCTION

Purpose

The Coronavirus Emergency Solutions Grant (ESG-CV) is intended to be used to **prevent, prepare for, and respond to coronavirus**, among individuals and families who are homeless or receiving homeless assistance and to support additional **homeless assistance and homelessness prevention activities to mitigate the impacts created by coronavirus**.

Preventing coronavirus means to prevent the initial or further spread of the virus to people experiencing homelessness, people at risk of homelessness, recipient or subrecipient staff, or other shelter or housing residents. **Preparing for coronavirus** means to plan to keep people healthy and reduce the risk of exposure to coronavirus and avoid or slow the spread of disease prior to or during a coronavirus outbreak.

Responding to coronavirus means to act once coronavirus has spread to people experiencing homelessness, service providers, or once individuals and families lose or are at risk of losing their housing as a result of the economic downturn caused by coronavirus.¹

Homeless assistance and homelessness prevention means using a low barrier, housing-focused approach to ensure that homelessness is rare, brief, and non-recurring. This includes (1) engaging homeless individuals and families living on the street; (2) improving the number and quality of emergency shelters for homeless individuals and families; (3) helping operate these shelters; (4) providing essential services to shelter residents, (5) rapidly rehousing homeless individuals and families, and (6) preventing families and individuals from becoming homeless **to mitigate the impacts created due to the coronavirus**.²

Establishment of Funds

Emergency Solutions Grant (ESG) funds were established by Subtitle B of Title IV of the Stewart B. McKinney-Vento Homeless Assistance Act (Public Law 100-77, Public Law 100-628) as amended by the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act)³ which authorized the ESG program for the purpose of providing assistance to persons who are homeless or at-risk of homelessness.

The Coronavirus Aid, Relief, and Economic Security (CARES) Act of 2020 provided the Department of Housing and Urban Development (HUD) up to \$3.96 billion in ESG supplemental funding to prevent, prepare for, and respond to coronavirus, among individuals and families who are homeless or receiving homeless

¹ Prevent, prepare for, and respond to coronavirus are further defined in [Appendix E](#).

² For any homelessness assistance or prevention that does not directly prevent, prepare for, or respond to coronavirus, among individuals and families who are homeless or receiving homeless assistance, it must be used to mitigate the impacts created by coronavirus to be eligible for ESG-CV funding.

³ Full text for the McKinney-Vento Homeless Assistance Act as amended by the HEARTH Act of 2009 [here](#).

assistance and to support additional homeless assistance and homelessness prevention activities to mitigate the impacts created by coronavirus. On April 2, 2020 HUD allocated \$1 billion of this funding nationwide with special ESG-CV funds to respond to the current coronavirus health pandemic. On June 9, 2020, HUD allocated the remaining \$2.96 billion with ESG-CV funds as well.⁴ The Missouri Housing Development Commission (MHDC) is responsible for administering the Missouri state allocation of the Coronavirus Emergency Solutions Grant (ESG-CV) program funds granted to MHDC by the Missouri Department of Social Services (DSS).

Regulations and Authority

The Missouri ESG-CV program is administered under the provisions of the HUD regulations within Title 24 Code of Federal Regulations (CFR) [Part 576](#), unless otherwise stated in [CPD-21-08](#) titled “Waivers and Alternative Requirements for the Emergency Solutions Grants (ESG) Program Under the CARES Act”.⁵ They are also subject to the agency’s executed grant agreement and the ESG-CV Desk Guide. Grantees are highly encouraged to review all HUD ESG-CV program requirements. MHDC has flexibility in certain areas of administering the ESG-CV Program and may establish more detailed requirements than those required by HUD. Where there are differences, grantees should comply with MHDC’s requirements reflected in the grant agreement and ESG-CV Desk Guide.

As the coronavirus health pandemic and its societal impact continues to change over time, the regulations of ESG-CV may be periodically updated. These changes may come from the CDC, HUD, DSS, MHDC, or other authorities. MHDC will update the ESG-CV Desk Guide, ESG-CV [webpage](#), and provide additional trainings and forums as necessary. However, **it remains the responsibility of each funded organization to ensure that they are updated on these changes**. Failing to comply with updated regulations may result in an organization being found out of compliance and/or having their funding suspended.

⁴ The allocations were announced in [Notice 20-049](#) and [Notice 20-077](#), respectively.

⁵ [CPD-21-08](#) was published 7/19/21 and replaced the previous Notice (CPD-20-08). As of 8/6/21, MHDC began administering the ESG-CV program following the updated regulations from CPD-21-08 and disregarded the regulations of CPD-20-08.

Eligible Program Components

Street Outreach (SO)

Intended to meet the immediate needs of unsheltered homeless individuals and families by connecting them with emergency shelter, housing, and/or critical health services.

Standard Emergency Shelter (SES)

Intended to increase the quantity and quality of standard emergency shelter provided to homeless individuals and families by paying for operating and essential services expenses.

Temporary Emergency Shelter (TES)⁶

Intended to increase the quantity and quality of temporary emergency shelter provided to homeless individuals and families by paying for operating and essential services expenses.

Homelessness Prevention (HP)

Intended to prevent households from becoming homeless through rental assistance and housing relocation and stabilization services.

Rapid Rehousing (RRH)

Intended to quickly move homeless individuals and families to permanent housing through rental assistance and housing relocation and stabilization services.

Homeless Management Information System (HMIS)

Intended to support ESG-CV recipient participation in the HMIS (or comparable database for victim service providers) collection and data analysis of households that are homeless or at risk of homelessness.

⁶ Temporary Emergency Shelters are new form of emergency shelter that have separate requirements and expenses from Standard Emergency Shelters. See [Appendix E](#) for further details.

GRANT ADMINISTRATION

General Information

Contacts

Below is the Missouri Housing Development Commission ESG-CV contact. Please direct all questions, concerns, updates and submission of documents to the ESG-CV Grant Specialist, with the exception of payment requests. Payment requests shall be submitted electronically by completing and uploading the appropriate forms in an online grant interface.

Please direct questions, concerns, and updates to:

Aidan Rich, ESG-CV Grant Specialist

Missouri Housing Development Commission

920 Main, Suite 1400

Kansas City, MO 64105

(816) 759-6632

aidan.rich@mhdc.com

Please submit payment requests electronically:

<https://www.grantinterface.com/Home/Logon?urlkey=mhdc>

Website

All information and forms pertaining to MHDC's ESG-CV program can be found on the following website:

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

Timeline

The following timeline lists the key dates for the ESG-CV grant period, which are also detailed in the grant agreement. Grantees are responsible for knowing these dates as well as communicating them to all applicable staff.

Grant Billing Period Begins	March 13, 2020
Quarter 1 (Q1)	October 01, 2020 - December 31, 2020
Q1 Payment Request Deadline	January 04, 2021, 5:00 p.m.
Q1 Quarterly and Cumulative CAPER ⁷ Deadline	January 15, 2021, 11:00 p.m.
Quarter 2 (Q2)	January 01, 2021 – March 31, 2021
25% Spending Deadline	April 01, 2021, 11:00 p.m.
Q2 Payment Request Deadline	April 01, 2021, 5:00 p.m.
Q2 Quarterly and Cumulative CAPER Deadline	April 16, 2021, 11:00 p.m.
Quarter 3 (Q3)	April 01, 2021– June 30, 2021
Q3 Payment Request Deadline	July 01, 2021, 5:00 p.m.
Q3 Quarterly and Cumulative CAPER Deadline	July 16, 2021, 11:00 p.m.
Quarter 4 (Q4)	June 01, 2021 – September 30, 2021
50% Spending Deadline	October 01, 2021, 11:00 p.m.
Q4 Payment Request Deadline	October 01, 2021, 5:00 p.m.
Q4 Quarterly and Cumulative CAPER Deadline	October 15, 2021, 11:00 p.m.
Quarter 5 (Q5)	October 01, 2021 - December 31, 2021
Q5 Payment Request Deadline	January 03, 2022, 5:00 p.m.
Q5 Quarterly and Cumulative CAPER Deadline	January 14, 2022, 11:00 p.m.
Quarter 6 (Q6)	January 01, 2022 – March 31, 2022
80% Spending Deadline	March 31, 2022, 11:00 p.m.
Q6 Payment Request Deadline	April 01, 2022, 5:00 p.m.
Q6 Quarterly and Cumulative CAPER Deadline	April 15, 2022, 11:00 p.m.
Quarter 7 (Q7)	April 01, 2022– June 30, 2022
Q7 Payment Request Deadline	July 01, 2022, 5:00 p.m.
Q7 Quarterly and Cumulative CAPER Deadline	July 15, 2022, 11:00 p.m.
Quarter 8 (Q8)	June 01, 2022 – August 31, 2022
Q8 Payment Request Deadline	September 01, 2022, 5:00 p.m.
Close Out Deadline	September 01, 2022, 5:00 p.m.
Q8 Quarterly and Cumulative CAPER Deadline	October 14, 2022, 11:00 p.m.

⁷ HMIS Lead Agencies submit both Quarterly and Cumulative CAPERs after each quarter for non-victim service providers to MHDC. Victim service providers submit their own Quarterly and Cumulative CAPERs after each quarter to MHDC. Each agency is responsible for submitting their own final Quarterly and Cumulative CAPERs into the SAGE portal.

Financial Processes

Funding Period

All ESG-CV funding provided to grantees must be used for expenses that are incurred and paid for on or after March 13, 2020⁸ and before August 31, 2022.

Request for Payment

ESG-CV grants are provided on a reimbursement basis only, therefore ESG-CV funds must be expended on eligible activities for eligible program participants before funds can be requested. Before grantees can request reimbursement for ESG-CV, the following criteria must be met:

- All current year grant agreement documents must be completed and received.
- All previous compliance issues must be resolved (i.e., grantee is “in compliance”).

Once all of the above criteria is met and the grantee has expended funds on eligible ESG-CV activities, grantees may request ESG-CV funds by completing and submitting the appropriate follow-up form in the [grant interface](#).

Submission Requirements

Funded agencies must submit complete payment requests electronically by completing and uploading the documents in the [grant interface](#) software via follow-up forms assigned to the organization.

All payment requests must include:

- CV-212 Expense Detail Form for each funding component with requested funds.
- HMIS/comparable database report for each funding component with requested funds. Note that the type of report is dependent upon the funding component.⁹

All payment requests must be submitted on MHDC’s approved payment request form (CV-212). Grantees will need to verify that all expenses were used to either (1) prevent, prepare for, or respond to coronavirus, among individuals and families who are homeless or receiving homeless assistance or (2) support additional homeless assistance and homelessness prevention activities to mitigate the impacts created by coronavirus. All recipient payment requests are submitted to DSS (by MHDC) in one monthly draw and are typically paid out in 4-6 weeks. Agencies must submit a payment request to MHDC no later than 5:00 p.m. on the first business day of the month in order to receive reimbursement on the next invoice submitted to DSS. MHDC will only allow one payment request per month. All payment requests shall be submitted via the [grant interface](#) software.

⁸ March 13, 2020 was the date that Governor Parson signed [Executive Order 20-02](#) declaring a State of Emergency in Missouri

⁹ If the request includes Street Outreach and the attached HMIS Street Outreach roster shows no clients, the organization must also include the CI-113 Street Outreach Engagement Tracking form in their submission.

Common Reasons for Discarded Payment Requests

- Certificate of Insurance (COI) has expired
- Missing HMIS reports or CV-212 sheets
- Ineligible expenses
- Unauthorized signature

Please submit payment requests electronically via the grant interface at:

<https://www.grantinterface.com/Home/Logon?urlkey=mhdc>

Spending Deadlines

Grantees are required to meet the following spending deadlines:

- Request and be approved for reimbursement of at least 25 percent (25%) of their total grant award amount by March 31, 2021
- Request and be approved for reimbursement of at least 50 percent (50%) of their total grant award amount by October 1, 2021
- Request and be approved for reimbursement of at least 80 percent (80%) of the total grant award by March 31, 2022
- Request and be approved for reimbursement of 100 percent (100%) of the total grant award by August 31, 2022

MHDC has the discretion to recapture a portion or all remaining ESG-CV funds as of these deadlines.

Budget Amendments

ESG-CV grantees may spend ESG-CV funds on any eligible activity within the funding component they were awarded in (e.g., Rapid Rehousing dollars may be spent on any eligible Rapid Rehousing activity as outlined in [24 CFR 576 Subpart B](#) or [CPD-21-08](#)). In certain instances, grantees may request amendments to the original budget provided in the grant agreement in order to move funds to other main components with MHDC approval. Grantees must submit an amendment request in writing via email to the MHDC ESG-CV Grant Specialist at aidan.rich@mhdc.com outlining the proposed amendment. Upon approval to move forward, a CV-213 Amendment Request form will be provided for completion. The form will detail the original budget, the proposed change, the new budget, and must explain why the amendment is needed. Once the form is completed and signed, it should be emailed in pdf format to the MHDC ESG-CV Grant Specialist for final approval. If approved, a grant amendment approval letter will be sent to the grantee for review and signature. The original copy must be received and executed by MHDC before the budget change is finalized. Amendments do not change the grant amount, only the component in which funding can be spent.

Budget Modifications

ESG-CV grantees may request a modification to the original budget approved in the grant agreement in order to receive additional funding with MHDC approval. Grantees must submit a request in writing via email to the MHDC ESG-CV Grant Specialist at aidan.rich@mhdc.com outlining the proposed modification and then the CV-216 Modification Request form will be provided for completion. The form will detail the original award amount, the additional funds requested, the new award amount, and descriptions of the expenses that can be reimbursed with the additional funds. Once the form is completed and signed, it should be emailed in pdf format to the MHDC ESG-CV Grant Specialist for approval. If the request is approved, a grant modification agreement will be sent to the grantee for review and signature. The original copy must be received and executed by MHDC before the budget change is finalized.

Prior to the approval of a modification request, agencies must request and be approved for the reimbursement of 100 percent (100%) of their current funding in all components. Grantee's that have been funded by MHDC in some capacity prior the ESG-CV program will be required to schedule a desk review or site visit with either the Compliance Officer or the ESG-CV Specialist before the modification approval can be made.¹⁰ Grantee's that have not been funded by MHDC in any capacity prior the ESG-CV program, must schedule and complete a desk review or site visit prior to the approval of any additional funding. If the grantee is found out of compliance, they must follow the protocol detailed in the [Compliance Violations](#) section of this Desk Guide. After being found in compliance again, the grantee must undergo an additional desk review or site visit and be found in compliance before the modification can be approved.

Special Budget Modifications

In certain instances, grantees may be able to request and receive approval for modifications prior to the request and approval of reimbursement for 100 percent (100%) of their current award. These instances are as follows:

Exceptional Need Budget Modification

Grantees who can demonstrate an exceptional need for more funding may request a modification to be approved for additional funding prior to requesting and being approved for 100 percent (100%) of their current award. These grantees may also be exempt from the requirement to schedule and conduct a desk review or site visit prior to the execution of their modification at the sole discretion of MHDC.

In order for a grantee to demonstrate this exceptional need, they will be required to complete the CV-217 Spending Plan form in addition to the CV-216. Both forms can be requested via an email to the MHDC ESG-CV Grant Specialist at aidan.rich@mhdc.com. Once the forms are completed and signed, they

¹⁰ "Schedule a desk review or site visit" means the act of agreeing upon a date and time to conduct the desk review or site visit. It does not refer to the completion of a desk review or site visit. Grantee's that have been funded by MHDC in some capacity prior the ESG-CV program are allowed to be approved for a modification prior to conducting the site visit or desk review as long as one has been scheduled to take place shortly after the approval of the modification.

should be emailed in pdf format to the MHDC ESG-CV Grant Specialist for approval. For an agency to receive this exemption to the spending requirements for modifications, they must demonstrate the following via the CV-217:

1. They will be requesting an amount in reimbursement equal to or greater than their remaining award in the following month
2. They will be requesting reimbursement on a monthly basis for the following three months after the exemption approval

If the request is approved, a grant modification agreement will be sent to the grantee for review and signature. The original copy must be received and executed by MHDC before the budget change is finalized.

Grantees who receive Exceptional Need Budget Modifications will be required to request and be approved for reimbursement on a monthly basis for the three months following the execution of their modification. The grantee will also be required to request and be approved for reimbursement for an amount greater than their remaining award in the first month following the execution of their modification. Failure to follow through on these requirements will result in the inability of the grantee to receive an Exceptional Need Budget Modification in the future and may result in recapture.

Coronavirus Mitigation Budget Modifications

Grantees may request a modification to receive up to \$100,000 in additional funding for expenses exclusively focused on mitigating the spread of coronavirus. This funding includes the following subcomponents:

- Vaccine Incentives under Street Outreach, Standard Emergency Shelter, Temporary Emergency Shelter, Homelessness Prevention, and Rapid Rehousing
- Vaccine and Testing Transportation under Street Outreach, Standard Emergency Shelter, Temporary Emergency Shelter, Homelessness Prevention, and Rapid Rehousing
- Disease Mitigation Training under Street Outreach, Standard Emergency Shelter, Temporary Emergency Shelter, Homelessness Prevention, and Rapid Rehousing
- Hygiene Services under Street Outreach

The above subcomponents are considered “Coronavirus Mitigation Services”. Coronavirus Mitigation funding can also be used for the following subcomponents, but only for time spent by employees and/or volunteers providing Coronavirus Mitigation Services:

- Hazard Pay under Street Outreach, Standard Emergency Shelter, Temporary Emergency Shelter, Homelessness Prevention, and Rapid Rehousing
- Volunteer Incentives under Street Outreach, Standard Emergency Shelter, Temporary Emergency Shelter, Homelessness Prevention, and Rapid Rehousing

The purchase of Personal Protective Equipment (PPE) can also be reimbursed using Coronavirus Mitigation funding under Essential Services for Street Outreach, Standard Emergency Shelter, and Temporary Emergency Shelter and under Housing Relocation and Stabilization Services for Homelessness Prevention and Rapid Rehousing. Grantees may also allocate 10 percent (10%) of their additional funding for Coronavirus Mitigation to Administration and/or HMIS, but only for expenses that relate specifically to the administration and HMIS/Comparable Database data collection for Coronavirus Mitigation eligible services.¹¹

The process for Coronavirus Mitigation Budget Modifications is the same as the aforementioned modifications. Grantees must submit a request in writing via email to the MHDC ESG-CV Grant Specialist at aidan.rich@mhdc.com outlining the proposed modification and then the CV-216 Modification Request form will be provided for completion. Once the form is completed and signed, it should be emailed in pdf format to the MHDC ESG-CV Grant Specialist for approval. If the request is approved, a grant modification agreement will be sent to the grantee for review and signature. The original copy must be received and executed by MHDC before the budget change is finalized.

Coronavirus Mitigation Budget Modification funds need to be requested separately from other modifications (with a separate CV-216 form), even if the grantee is requesting both modifications simultaneously. While funds for Coronavirus Mitigation can be moved between funding components via an amendment, they must still be used for expenses specifically listed in this section even if they are moved to new main components.

Additional Coronavirus Mitigation funding received will not count towards a grantee's spending for the 50 percent (50%) spending deadline on 10/1/21, unless the inclusion of those funds in the spending calculation would increase the agencies spending percentage in the agency's favor. These funds are still subject to the 80 percent (80%) spending deadline on 3/31/22 and the final spending deadline on 8/31/22.

Fixed Assets

Grantees must provide MHDC a written request for approval of expenditures of assets including: equipment, computer equipment, software, medical equipment and other real and personal property that costs in excess of \$5,000.00. Grantees must also include at least three bids for any such expenditure. Failure to obtain prior approval for expenditures in excess of \$5,000.00 may result in a disallowance of the expenditure for purposes of reimbursement. Approved expenditures greater than or equal to \$5,000.00 must be monitored by MHDC for the useful life of the asset and includes physical inspections and annual certifications. Ongoing monitoring for current fixed assets include submission of the fully executed ESG-214 Certification of Continuing Capital Expenditure Compliance form to MHDC's Compliance Officer at dhoss@mhdc.com, due on or before January 1st annually. A physical inspection of the asset will occur during a site visit or virtually during a desk review annually. Failure to comply will result in "out of

¹¹ This is 10 percent (10%) in total. For example, if a grantee wants to equally allocate funding to Administration and HMIS, then they can allocate 5 percent (5%) to Administration and 5 (5%) percent to HMIS.

compliance” status for the agency.

Homeless Management Information System

The Homeless Management Information System (HMIS) is a database that records and stores client-level data regarding the delivery of housing and services to households who are homeless and/or at-risk of homelessness. ESG-CV grantees are required to enter data on all persons served into the HMIS recognized by their Continuum of Care (CoC). 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.¹² Legal services organizations may choose to enter into a comparable database rather than the HMIS. The data must be entered into the HMIS that represents the county of service. If the grantee serves persons with ESG-CV funds in multiple CoCs, HMIS data must be entered into each appropriate HMIS of those CoCs. Grantees are responsible for ensuring that all data collection within HMIS and any comparable databases are in compliance with the HUD HMIS Minimum Data Standards,¹³ therefore grantees should work with their HMIS lead agencies and comparable database providers to ensure they are trained on proper data entry and are consulting with their provider regularly regarding any issues or questions.

Reports

Quarterly Consolidated Annual Performance Evaluation Report (QCAPER)

Grantees are required to generate the data necessary for a Quarterly Consolidated Annual Performance Evaluation Report (QCAPER) through a Comma Separated Value (CSV) export from their HMIS or comparable database for all ESG-CV funded projects. These CAPERs run from the **beginning of the reporting quarter** to the **end of the reporting quarter**. The HMIS lead agency for each CoC will submit Quarterly CAPER reports on behalf of the agencies they serve. HMIS lead grantees do not need to submit Quarterly CAPERs on their own behalf as this component does not directly serve individuals. HMIS leads are required to submit Quarterly CAPERs on the second Friday after the first Monday following the end of each quarter (see [Timeline](#)) for all ESG-CV grantees in their CoC. The reports are submitted directly into Sage.¹⁴ HMIS lead agencies do not have to submit CSVs via email as they did in the past. However, agencies using HMIS comparable databases must submit their own individual Quarterly CAPERS for each ESG-CV component for which they are funded directly into Sage.

Sage upload links for HMIS lead agencies and agencies using comparable databases to upload their CSV exports should be sent out by the ESG-CV Grant Specialist in the first business week of the month in which the uploads are due. These links are generated by MHDC and sent directly out of Sage. These emails are

¹² Comparable databases are further defined in [Appendix E](#).

¹³ HUD’s webpage for HMIS Data Standards and other HMIS resources can be found [here](#).

¹⁴ Sage is the HMIS Reporting Repository or a software used by HUD to collect CAPER information.

likely to be filtered into agencies junk folders. **If you are a HMIS lead agency or an agency using a comparable database, lookout for these emails during the first business week of each month in which CSV exports are due.** If you have received this email, make sure to categorize emails from the sender as not being junk or spam. For the three business days following the release of these links, the HMIS lead agencies and agencies using comparable databases will not be able to submit any uploads. This three-day hold is an opportunity for each agency who is in charge of submitting uploads to review their bundles and inform the ESG-CV Grant Specialist if there are any errors. If errors are found, the ESG-CV Grant Specialist will send new links out to every agency that previously received links and will inform them all in a separate email. Once the three-day hold ends, HMIS lead agencies and agencies using comparable databases will be able to submit their data using the most recently sent link from Sage.

Cumulative Consolidated Annual Performance Evaluation Report (CCAPER)

For further transparency, HUD requires a second type of CAPER to be completed on a quarterly basis. These CAPERs run from the **project start date** to the **end of the reporting quarter**. The HMIS lead agency for each CoC will submit Cumulative CAPER reports on behalf of the agencies they serve. HMIS lead grantees do not need to submit Cumulative CAPERs on their own behalf as this component does not directly serve individuals. HMIS leads are required to submit Cumulative CAPERs on the second Friday after the first Monday following the end of each quarter (see [Timeline](#)). The Cumulative Reports are submitted directly into Sage, so HMIS lead agencies do not have to submit CSVs via email as they have in the past. However, agencies using HMIS comparable databases must submit their own individual Cumulative CAPERS for each ESG-CV component for which they are funded directly into Sage.

Links for HMIS lead agencies and agencies using comparable databases to upload their CSV exports should be sent out by the ESG-CV Grant Specialist in the first business week of the month in which the uploads are due. These links are sent directly out of Sage and are likely to be filtered into agencies junk folders. **If you are a HMIS lead agency or an agency using a comparable database, lookout for these emails during the first business week of each month in which CSV exports are due.** If you have received this email, make sure to categorize emails from the sender as not being junk or spam. For the three business days following the release of these links, the HMIS lead agencies and agencies using comparable databases will not be able to submit any uploads. This three-day hold is an opportunity for each agency who is in charge of submitting uploads to review their bundles and inform the ESG-CV Grant Specialist if there are any errors. If errors are found, the ESG-CV Grant Specialist will send new links out to every agency that previously received links and will inform them of this in a separate email. Once the three-day hold ends, HMIS lead agencies and agencies using comparable databases will be able to submit their data using the most recent link from Sage.

Monitoring

In order to track a grantee's program compliance, ensure accurate spending of ESG-CV funds, prevent fraud

and abuse, and to identify technical assistance needs, MHDC staff will monitor grantees by conducting either a site visit or desk review.

Site Visits

The Compliance Reviewer¹⁵ will review expenses billed to ESG-CV that have already been reimbursed. Compliance Reviewer will not review ESG-CV expenses that have not yet been submitted for reimbursement. The information reviewed is gathered from the HMIS reports, comparable database reports, and CV-212 forms submitted with the grantee's payment requests. The Compliance Reviewer will not provide the grantee the names of the files to be checked prior to the visit; this is to ensure that all files will be reviewed in the state in which they are normally maintained.

The requested files are expected to be produced, as hard copy documents, within **15 minutes of the Compliance Reviewer's arrival**.¹⁶ Failure to produce requested files within fifteen 15 minutes will result in a compliance violation. Therefore, it is vital that a staff member is always available to assist MHDC staff as needed at the grantee location during the times provided by the grantee on the ESG-CV Site Contact Form.¹⁷

Announced Site Visit

The announced site visit is scheduled by the Compliance Reviewer with the grantee. If the Compliance Reviewer is unsuccessful in scheduling a site visit after three attempts have been made via telephone and/or e-mail, the Compliance Reviewer will notify the grantee that they have 15 days to schedule a site visit, otherwise their funding will be suspended and grantee will be considered out of compliance and no funds will be released until the visit is scheduled. Once the visit is scheduled, the grantee will be provided Compliance Guidance which details the expectations for the visit; the Compliance Guidance can also be found on MHDC's website at: <http://www.mhdc.com/ci/compliance/index.htm>.

Unannounced Site Visit

MHDC staff members have the right to conduct unannounced site visits at the location(s) and times provided by the grantee on the Site Contact Form. It is the grantee's responsibility to notify MHDC if business hours change or if the grantee will be closed for an extended amount of time. Unannounced site visits are conducted based on certain factors, including but not limited to:

- Grantee's prior history with ESG-CV
- Concerns/deficiencies noted in grantee's audit and/or financial statements
- Outcome of announced site visit

¹⁵ The Compliance Reviewer is a role that may be filled by the MHDC Compliance Officer, the ESG-CV Grant Specialist, or multiple MHDC staff.

¹⁶ The only exception being if a staff member is assisting a client.

¹⁷ See [Appendix A](#) for further details on the Site Contact Form.

- Fulfilling grant requirements such as timely and accurate submission of payment requests

MHDC will not conduct site visits on state or federal holidays.

Electronic Files

If the grantee elects to maintain electronic files in lieu of paper files, the grantee will be required to print all required documentation for site visits, including case notes and/or housing stability plans. As with all files, the time limit to produce these files is 15 minutes during a site visit.

Exit Interview

At the conclusion of the site visit, the Compliance Reviewer will discuss the findings of the visit with the appropriate grantee staff member(s). The grantee will be given the opportunity to discuss the findings as well as any other questions and concerns with the Compliance Reviewer. The Compliance Reviewer will conduct a written exit interview in order to ensure that grantee representative is in agreement with the outcome of the visit, as well to document any follow-up actions required by MHDC and/or grantee. The final compliance status is determined at the discretion of the HUD Programs Manager.

Desk Reviews

Desk reviews are similar to site visits, except they are conducted virtually. The Compliance Reviewer will email a list of the required files and the grantee will have 24 hours to provide the requested files virtually. Failure to produce requested files within 24 hours will result in a compliance violation. For a desk review, the “Exit Interview” will be sent via email, allowing the grantee to provide additional documentation or answer any questions within 24 hours of the email.

Monitoring Letter

After completing a site visit or desk review, the Compliance Reviewer will email the grant contact a post-monitoring report detailing the results of the review, including any minor or major findings, areas for improvement, corrective actions that need to be taken and the deadline to complete these actions.

Common Compliance Errors

- Missing required forms
- Participants failing to disclose income information/inadequate intake application
- Missing household eligibility documentation (i.e., income and homelessness)
- Missing documentation of case management and housing stability goals
- Utilizing net vs gross income amounts and/or frequency of pay
- Utility allowance calculation

HMIS Lead Agencies

MHDC will monitor HMIS lead agencies by desk reviews requiring supporting documentation for items selected on expense detail report forms (submitted within the payment request forms) by MHDC staff.

Compliance Violations

The following violations will result in a grantee being out of compliance, which will require MHDC to suspend ESG-CV funding, assess points for future applications, and in most instances, a Corrective Action Plan (CAP) will be required in order to reinstate compliance status:

- 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

If the Compliance Reviewer finds that the grantee is out of compliance, the Compliance Reviewer will record that the grantee is out of compliance. Until the Compliance Reviewer has verified that the issue(s) has/have been resolved, ESG-CV funding will be suspended.

If the grantee is found out of compliance they will need to, in most instances, submit a Corrective Action Plan (CAP) detailing the reason(s) for out of compliance status and how the findings will be corrected. Depending on the reason(s) for out of compliance status, grantees may also be subject to a follow-up site visit or desk review conducted by MHDC staff in order to ensure that the issues have been resolved.

If the issue(s) that caused the grantee to be out of compliance are resolved after submission of the CAP and/or follow-up site visit or desk review, the Compliance Reviewer will notify the grantee that their funding is no longer suspended. If the issue(s) that caused the grantee to be out of compliance are still not resolved after the CAP and/or follow-up site visit or desk review, the Compliance Reviewer will notify the grantee of their findings and funding will be suspended for all grants that the agency has been awarded through the HUD Programs Department and State Initiative Department at MHDC.

Environmental Review

ESG-CV grantees are required to comply with the National Environmental Policy Act (NEPA) to limit the potential environmental impacts of a project. The only projects that require environmental review for this purpose are construction or rehabbing of standard emergency shelters, which are not eligible under the MHDC ESG-CV program. Therefore, all ESG-CV activities will be either categorically excluded or exempt from an environmental review. This includes temporary emergency shelters that have been determined by the

State or local health officials to be necessary to prevent, prepare for, and respond to coronavirus. As the “Responsible Entity” (as defined in [24 CFR 58.2](#)), MHDC is solely responsible for the environmental review, including documenting whether an activity is categorically excluded or exempt. Funded organizations are expected to comply with and provide all necessary documentation to MHDC with regard to environmental review requirements and may be held out of compliance for not doing so.

Area-Wide Systems Coordination

Coordination with Other Targeted Homeless Services

To ensure funds are deployed quickly to address the immediate public health crisis and prevent the spread of coronavirus, the Coordination with Other Targeted Homeless Services requirements at [24 CFR 576.400\(b\)](#) and [24 CFR 576.400\(c\)](#) are waived. MHDC encourages grantees to coordinate and integrate ESG-CV activities with mainstream housing, health, social services, employment, education, and youth programs, as well as programs targeted to homeless people in its service area to provide a strategic, community-wide system to prevent and end homelessness. Please refer to the ESG regulations [24 CFR 576.400\(b\)](#) and [24 CFR 576.400\(c\)](#) for a full list of these programs.

Coordinated Entry System

With respect to costs incurred between January 21, 2020 and June 30, 2020 that are allowable under [CPD-21-08](#) but not under [24 CFR 576 Subpart B](#), the requirements to use the CoC’s centralized or coordinated assessment under [24 CFR 576.400\(d\)](#), administer the assistance in accordance with written standards as provided under [24 CFR 576.400\(e\)](#), and participate in HMIS under Section 416(f) of the [McKinney-Vento Act](#) and [24 CFR 576.400\(f\)](#) are waived for either (1) the first 60 days of the project’s operation or (2) until June 30, 2020, whichever is shortest. For example, if a project started May 18, 2020 that is eligible under [CPD-21-08](#) but not under [24 CFR 576 Subpart B](#), then the waivers only apply for the first 43 days of the project’s operation since May 18, 2020 is less than 60 days before the June 30, 2020 deadline.

When the waivers above are not applicable, the requirements to use the CoC’s centralized or coordinated assessment under [24 CFR 576.400\(d\)](#), administer the assistance in accordance with written standards as provided under [24 CFR 576.400\(e\)](#), and participate in HMIS under Section 416(f) of the [McKinney-Vento Act](#) and [24 CFR 576.400\(f\)](#) still apply. All Missouri CoC’s are required to develop a coordinated entry system in accordance with requirements established by HUD. A coordinated entry system should provide easy access for households seeking housing or services. Each ESG-CV-funded non-victim services provider within the CoC’s area must use that assessment system to ensure consistent screening, assessment, prioritization and referral of program participants ([24 CFR 576.400\(d\)](#)). Each provider must also work with its CoC to ensure that the screening, assessment, and referral of program participants are consistent with the required program guidelines. Victim services providers may choose not to use the CoC’s coordinated entry system.

Terminating Assistance

Per [24 CFR 576.402](#), if a program participant violates program requirements, their ESG-CV benefits may be terminated in accordance with a formal process established by the grantee that recognizes the rights of the individuals affected and allows for due process. The grantee must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a participant's assistance is terminated only in the most severe cases. Termination does not bar the grantee from providing further assistance at a later date to the same family or individual. To terminate rental assistance or housing relocation and stabilization services, the grantee's formal process must include and document at minimum:

- Written notice to the program participant containing a clear statement of the reason(s) for termination;
- A review of the decision, in which the participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
- Prompt written notice of the final decision to the participant.

Agencies should ensure that the Housing First approach is implemented within their homelessness service system, especially in regards to termination of assistance.¹⁸

Recordkeeping Requirements

Program Guidelines

Per [24 CFR 576 Subpart E](#), every ESG-CV grantee must develop, implement and document program guidelines that include:

- Policies and procedures for evaluating households' eligibility for ESG-CV assistance;
- Targeting and providing essential services related to Street Outreach;
- Policies and procedures for admission, diversion, referral, and discharge by Standard and Temporary Emergency Shelter programs;
- Policies and procedures for assessing, prioritizing, and reassessing households' needs for essential services related to Standard and Temporary Emergency Shelter programs;
- Policies and procedures for coordination among Standard Emergency Shelter providers, Temporary Emergency Shelter providers, essential services providers, Homelessness Prevention, and Rapid Rehousing assistance providers; other homeless assistance providers; and mainstream

¹⁸ See [Appendix D](#) for additional Housing First Resources.

service and housing providers;

- Policies and procedures for determining and prioritizing which eligible households will receive Homelessness Prevention and which households will receive Rapid Rehousing (policies should include emergency transfer priority required under [24 CFR 576.409](#));
- Standards for determining the share of rent and utilities costs that each program participant must pay, if any, while receiving Homelessness Prevention or Rapid Rehousing assistance;
- Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time; and
- Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide a program participant, including the limits, if any, on the Homelessness Prevention or Rapid Rehousing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participants receives assistance; or the maximum number of times the program participants may receive assistance.
- Policies and procedures for participation in the grantee's CoC coordinated entry system

In addition to these required sections, MHDC will also require all ESG-CV grantee's program guidelines to include the following coronavirus-related sections:

- Policies and procedures for preventing the initial or further spread of coronavirus to people experiencing homelessness, people at risk of homelessness, recipient or subrecipient staff, or other shelter or housing residents;
- Policies and procedures for planning to keep people healthy and reduce the risk of exposure to coronavirus and avoid or slow the spread of disease prior to or during a coronavirus outbreak;
- Policies and procedures for responding to coronavirus once it has spread to people experiencing homelessness, provider staff, or once individuals and families lose or are at risk of losing their housing as a result of the economic downturn caused by coronavirus; and
- Policies and procedures for executing ESG-CV funded operations and services remotely (to the furthest extent that is reasonable) and continuing ESG-CV funded operations and services in the event of further shutdowns or restrictions due to coronavirus.

Ineligible Clients

Grantees are required to maintain a record of all clients that are screened and classified as ineligible and reasons for the determination of ineligibility ([24 CFR 576.500\(d\)](#)).

Documenting Homeless Status

Per [24 CFR 576.500\(b\)](#), the recipient must maintain and follow written intake procedures to ensure

compliance with homeless and at-risk of homeless definitions and must include documentation required at intake to verify homeless status in order of HUD preference:

1. Third-party documentation (or written certification of third-party oral verification for those at-risk)
2. Intake worker observation
3. Self-certification from client seeking assistance

Appropriate homeless status documentation for intake files will vary depending on type of assistance provided and the circumstances of each participant. Some documentation is already available, such as discharge paperwork and HMIS service transactions.

Lack of third-party documentation or verification that one's homelessness status is in some part due to the impacts of coronavirus should not prevent a household from being immediately admitted to shelter, receiving Street Outreach services, or from receiving victims' services and shelter. The recordkeeping requirements for each homeless status are detailed as follows:

Literally Homeless

- Written observation by the outreach worker; or
- Written referral by another housing/service provider; or
- Certification by the head of household seeking assistance stating they were living on the streets or in shelter.

Imminent Risk of Homelessness

- A court order resulting from an eviction action notifying the household they must leave; or
- For households leaving a hotel/motel:
 - Evidence that they lack financial resources to stay; or
- A documented and verified oral statement; and
 - Certification that no subsequent residence has been identified; and
 - Self-certification or other written documentation that the household lacks financial resources and support necessary to obtain permanent housing.

At Risk of Homelessness

- Evidence that participant's annual income does not exceed 50 percent (50%) AMI; and
- Self-certification that the household lacks financial resources and support necessary to obtain permanent housing and meets at least one condition of the "at-risk of homeless" definition in [24 CFR 576.2](#); and
- Source documents to show the program participant does not have sufficient resources or support

networks (notice of employment termination, unemployment compensation statement, bank statement); or

- Written verification by relevant third-party (former employer, relative, etc.); or
- Written certification by the outreach worker of the oral verification by the third party; or
- Written statement describing efforts taken to obtain required evidence.

Fleeing/Attempting to Flee Domestic Violence

Oral statement by the head of household seeking assistance which states they are fleeing, have no subsequent residence, and lack other resources. Statement must be documented by a certification of the intake worker or self-certification.

Grant Close Out

Once all funds have been expended, grantee is required to close out their grant. The close out process consists of several components:

1. All funds expended
2. Final Payment Request submission
3. Close Out Documentation¹⁹

All complete and final close out information needs to be submitted electronically via the [Grant Interface](#) on or before 5:00 p.m. on September 01, 2022. Any funds that are not expended will be recaptured.

¹⁹ List of close out documentation can be found in [Appendix C](#).

PROGRAM ADMINISTRATION

Introduction

This section will discuss the specifics of administering the ESG-CV program. This will include participant's eligibility and eligible activities for each component of ESG-CV. Once again, the ESG-CV program has many different requirements and regulations than the standard ESG program. While this section does cover these changes, it is highly recommended that each funded organization also reads [CPD-21-08](#) titled "Waivers and Alternative Requirements for the Emergency Solutions Grants (ESG) Program Under the CARES Act". This Notice, in some instances, has more detail on new waivers and requirements. **All funded organizations will be expected to know the contents of [CPD-21-08](#) in its entirety.** Where there are contradictions between the Notice and this Desk Guide, please follow the desk guide or contact MHDC.

Program Participant Eligibility

Determining Participation

Grantees must conduct an initial evaluation of eligibility (in accordance with the local CoC's coordinated entry process) in order to determine:

- Each individual or family's eligibility for ESG-CV activities
- The applicant has no appropriate subsequent housing options
- The applicant lacks sufficient resources and support networks to obtain or retain housing
- The applicant has not received any financial assistance from other sources that could result in a duplication of benefits²⁰
- The total household income is below 50 percent (50%) AMI (Homelessness Prevention only)
- The minimum amount and types of assistance necessary (Homelessness Prevention and Rapid Rehousing only)

Evaluations must be conducted in accordance with the local coordinated entry process and the agency's program guidelines ([24 CFR 576.400](#)) which should follow the Housing First model. Where possible, agencies should attempt to divert households from homelessness, including those seeking shelter who are currently housed but at imminent risk. However, households seeking shelter that are fleeing, or are attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member should not be

²⁰ See [Appendix E](#) for further details on duplication of benefits.

diverted.

Re-Evaluating Participation

In addition to conducting an initial evaluation and connecting program participants to other resources, eligibility for ESG-CV Homelessness Prevention and Rapid Rehousing must be re-evaluated:

- At least once every six months for Homelessness Prevention assistance
- At least once annually for Rapid Rehousing assistance

At a minimum, the re-evaluation must establish that:

- Annual household income is not greater than 50 percent (50%) of the AMI
- The program participant lacks sufficient resources and support networks necessary to retain housing without ESG-CV assistance

Homeless Definitions

Individuals and families seeking assistance must be evaluated to determine their homeless status eligibility for ESG-CV. Each component summarizes the homeless definitions; the complete homeless definitions can be found at [24 CFR 576.2](#).²¹

Income

Individuals and families applying for ESG-CV Homelessness Prevention must have incomes below 50 percent (50%) AMI at initial evaluation. Individuals and families applying for ESG-CV Rapid Rehousing do not need an income assessment at initial evaluation but must have incomes less than or equal to 50 percent (50%) AMI at annual re-evaluation. Income requirements do not apply to program participants who are being served under Standard Emergency Shelter, Temporary Emergency Shelter, or Street Outreach components. When determining the annual income of a household, the grantee must refer to the standards for calculating income per [24 CFR 5.609](#) and the [HUD Handbook 4350.3, REV-1, Chapter 5](#). Current ESG-CV income limits can be found on HUD's website and are also posted on MHDC's website [here](#).

Inclusions

- Earned income (wages, salaries, net income from operating of a business or profession)
- Interest and dividend income
- Pension/retirement income
- Unemployment and disability
- TANF/public assistance

²¹ For ESG-CV, the definitions from [24 CFR 576.2](#) apply except for the changes made in the definitions section of [CPD-21-08](#).

- Alimony and child support income
- Regular contributions or gifts from organizations or persons not residing in the dwelling
- Armed forces income
- Any other income included in the [HUD Handbook 4350.3, REV-1, Chapter 5, Exhibit 5-1](#)

Exclusions

- Income of children under 18 (including foster care payments)
- Inheritance and insurance income
- Medical expense reimbursements
- Income of live-in aides
- Certain state payments regarding disability
- Student financial aid
- Armed forces hostile fire pay
- Temporary, non-recurring, or sporadic income
- Certain reparation payments
- Earnings in excess of \$480.00 for each full-time student who is 18 years old or older (excluding the head of household and spouse)
- Adoption assistance payments in excess of \$480.00 per adopted child
- Deferred periodic amounts from SSI or social security benefits that are received in a lump sum amount or in prospective monthly amounts
- Refunds or rebates for property taxes
- Amounts paid by the State to offset the cost to allow a developmentally disabled family member to remain in the home
- Any additional financial assistance from the CARES Act²²
- Any other exclusions related to [24 CFR 5.609](#)
- Any other exclusions included in the [HUD Handbook 4350.3, REV-1, Chapter 5, Exhibit 5-1](#)

²² This includes any stimulus checks or unemployment benefits related strictly to the CARES Act or in direct response to coronavirus from the federal, state, or local government.

Program Components and Eligible Activities

Street Outreach

ESG-CV funds may be used for the costs of providing essential services to unsheltered homeless people ([24 CFR 576.101](#)); connect them with emergency shelter, housing, or critical services; and provide urgent non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility.

Income

Income requirements do not apply to program participants who are being served under the Street Outreach component.

Eligibility

Street Outreach services are provided to persons who meet HUD's Category 1 definition of literally homeless.

Literally Homeless (Category 1)	Individual or family who lacks a fixed, regular, and adequate nighttime residence: <ul style="list-style-type: none"> 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.
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Eligible Activities – Essential Services

The following activities are eligible under the Essential Services subcomponent of the Street Outreach component for persons who meet the homeless status eligibility criteria outlined above:

Engagement

Activities designed to locate, identify, and build relationships with unsheltered homeless people for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs, including:

- Initial assessment of needs and program eligibility
- Providing crisis counseling
- Addressing urgent physical needs
- Actively connecting and providing information and referral

Housing-Focused Case Management

Assessment of the housing and service needs of unsheltered homeless persons and the arrangement for, coordination of, and monitoring of delivery of services to those persons, including:

- Participation in the centralized or coordinated assessment system of the local CoC

- Initial evaluation, verification and documentation of eligibility
- Counseling
- Developing, securing, and coordinating services
- Helping obtain Federal, State, and local benefits
- Monitoring and evaluating participant progress
- Providing information and referrals to other service providers
- Developing individualized housing and service plans

Emergency Health Services

Direct outpatient treatment of medical conditions by licensed professionals in community-based settings where unsheltered homeless people are living, including:

- Assessing participants' health problems and developing treatment plans
- Assisting participants in understanding their health needs
- Providing or helping participants obtain appropriate emergency medical treatment
- Providing medication and follow-up services

Emergency Mental Health Services

Direct outpatient treatment of mental health conditions by licensed professionals in community-based settings where unsheltered homeless people are living, including:

- Crisis interventions
- Prescription of psychotropic medications
- Explanation for the use and management of medications
- Combinations of therapeutic approaches to address multiple problems

Transportation Services

Travel by outreach workers, social workers or other service providers during the provision of eligible Street Outreach services,²³ including:

- Transporting unsheltered homeless individuals and families to emergency shelters or other service facilities
- Cost of a participant's travel on public transit

²³ Transportation for coronavirus testing and vaccination and for laundry services are both eligible under Street Outreach, but they are both billed under subcomponents from other Street Outreach transportation costs.

- Mileage allowance for outreach workers to visit participants
- Cost of staff to accompany or assist participants to use public transportation
- Costs associated with purchasing or leasing a vehicle **ARE NOT** eligible
- Employee travel to attend CoC meetings or trainings **ARE NOT** eligible expenses

Cellphones and Internet

In [CPD-21-08](#) HUD authorized ESG-CV funds to be used under [24 CFR 576.101\(a\)](#) to provide temporary cell phones for individuals and families experiencing homelessness, receiving rapid re-housing assistance under the Continuum of Care (CoC) program, Youth Homelessness Demonstration Program (YHDP), and ESG program, receiving homelessness prevention assistance under the ESG program, or residing in permanent supportive housing funded under the CoC and YHDP programs. This can be to the extent to enable them to participate in activities necessary to obtain or maintain housing (e.g., to interview for jobs, to receive health and mental health services, or to continue education). The phone must be owned by the grantee and the service plan must be in the grantee's name. The phone and phone service may be loaned to the program participant while stay-at-home or social distancing orders are in effect in the community in which the program participant resides, or while they continue to need it to participate in activities necessary to obtain and maintain housing that remain virtual even after social distancing measures are relaxed. The phone must be returned to the grantee when no longer necessary for the previously stated purposes.

Personal Protective Equipment (PPE)

In [CPD-21-08](#) HUD authorized ESG-CV funds to be used under [24 CFR 576.101\(a\)](#) to purchase equipment used for protection from coronavirus by both Street Outreach service providers and eligible clients, including:

- Face masks or shields
- Hand sanitizer
- Disposable gloves

Services for Special Populations

Any of the essential services listed above that have been tailored to address the special needs of homeless youth, victims of domestic violence and related crimes/threats, and/or people living with HIV/AIDS who are literally homeless.

Eligible Activities – Disease Mitigation Training

Training specifically on infectious disease prevention and mitigation for ESG-CV funded staff working directly to prevent, prepare for, and respond to coronavirus among persons who are homeless with Street Outreach activities. If the training on infectious disease prevention and mitigation is for staff who are not

funded under ESG-CV but are working directly to prevent, prepare for, and respond to coronavirus among persons who are homeless or at risk of homelessness, then it is also eligible under Street Outreach.

Eligible Activities – Hazard Pay

Hazard pay for staff working directly to prevent, prepare for, and respond to coronavirus among persons who are homeless with Street Outreach activities. This includes any staff who are putting themselves in proximity to persons with coronavirus or working in locations with a high likelihood of contracting coronavirus for Street Outreach activities. Hazard pay should only be provided to staff for the hours in which they putting themselves at risk while providing Street Outreach services. This time should be tracked separately on timesheets from time spent providing these same services without putting themselves at risk. The maximum amount that can be provided to staff for Hazard Pay is 50 percent (50%) of their hourly wage (or equivalent) in addition to their regular wage. The regular wage should be billed under Essential Services, while the bonus of up to 50 percent (50%) of their hourly wage (or equivalent) should be charged under Hazard Pay.

Eligible Activities – Volunteer Incentives

Providing reasonable incentives for volunteers who are currently helping to provide necessary Street Outreach during the coronavirus outbreak. Incentives can be provided for volunteering done in the past by an individual (within the grant period), but only if they are continuing to volunteer after the payment of the incentive. Timesheets or sign-in sheets should be kept to track the volunteer's involvement. Eligible incentives include:

- Cash
- Gift cards
- Meals immediately before, during, or immediately after the time spent volunteering
- Other²⁴

Eligible Activities – Vaccine Incentives

Making direct, cash payments of up to \$50.00 per dose to Street Outreach eligible clients as an incentive for receiving a coronavirus vaccine, for a maximum of \$100.00 in total cash payments per client. For single-dose vaccines, the client can receive one cash payment of \$50.00. For two-dose vaccines, the client can receive two separate cash payments of \$50.00 each.²⁵ Clients must present an official COVID-19 Record Card as proof that they received the dose. ESG-CV funds may only be used for vaccine incentives to the extent that other vaccine incentives are inaccessible or unavailable to people experiencing homelessness within the community. Grantees must certify that the client has not received any other vaccine incentive for each dose that the client is receiving a cash payment for using the CV-218 Vaccine

²⁴ Other forms of incentives may be use if approved beforehand by the ESG-CV Grant Specialist.

²⁵ These cash payments can only be made to clients after they receive the dose. Clients who are scheduled to receive a dose may not be paid in advance for that dose.

Incentive Documentation form. Clients receiving no ESG-CV services other than Vaccine Incentives, Vaccine and Testing Transportation, or both do not need to fill out the CV-104 to certify their homelessness status. These clients can certify their homelessness status using the CV-218 instead.

Eligible Activities - Vaccine and Testing Transportation

Transportation costs specifically for the transportation of Street Outreach eligible clients to and from coronavirus testing and vaccination sites is eligible as a separate subcomponent under Street Outreach, including:

- Costs of transporting individuals and families using vehicles owned by the grantee to and from coronavirus testing and vaccination sites²⁶
- Cost of public transportation for individuals and families to and from coronavirus testing and vaccination sites
- Cost for staff to accompany or assist participants to use public transportation to and from coronavirus testing and vaccination sites
- Costs associated with purchasing or leasing a vehicle **ARE NOT** eligible

Clients receiving no ESG-CV services other than Vaccine Incentives, Vaccine and Testing Transportation, or both do not need to fill out the CV-104 to certify their homelessness status. These clients can certify their homelessness status using the CV-218 instead.

Eligible Activities – Hygiene Services

Installing and maintaining handwashing stations and bathrooms (i.e., portable toilets) in outdoor locations for people experiencing unsheltered homelessness is eligible. Additionally, providing laundry services to prevent the spread of coronavirus among individuals and families experiencing unsheltered homelessness is also eligible. This can include mileage reimbursement for laundry trucks to outdoor locations where people are residing.²⁷

Eligible Activities – Centralized or Coordinated Assessment

Updating, enhancing, and operating the applicable centralized or coordinated assessment system under [24 CFR 576.400\(d\)](#) to prevent, prepare for, and respond to coronavirus, subject to the following alternative requirements:

1. The cost documentation must show that the use of ESG-CV funds is limited to the increase in system costs due to coronavirus; and
2. The recipient's use of funds for this activity must be coordinated with the CoC to ensure ESG-CV funding is used for the most critical centralized or coordinated assessment needs to allow the CoC

²⁶ This can be reimbursed using the Federal mileage rate.

²⁷ These are distinct from the [transportation](#) costs that are eligible under the Essential Services subcomponent of the Street Outreach component.

to quickly prioritize and refer to assistance individuals and families experiencing homelessness and at-risk of homelessness.

Record Keeping Requirements

Literally Homeless²⁸

- Written observation by the outreach worker; or
- Written referral by another housing/service provider; or
- Certification by the head of household seeking assistance stating they were living on the streets or in shelter.

Records to Maintain - Program Participants

Record	Criteria
Homelessness Status and Eligibility Certification	<ul style="list-style-type: none"> • Form CV-104²⁹
Initial Consultation Documentation	<ul style="list-style-type: none"> • Agency Intake Documentation
Case Management Documentation	<ul style="list-style-type: none"> • Assessing, arranging, coordinating, and monitoring delivery of services to facilitate housing stability • Notes must be dated and detail housing goals, plans, referrals
Consent Form	<ul style="list-style-type: none"> • Form CI-108 or CI-108-DV
Non-Identifying Identification Certification	<ul style="list-style-type: none"> • Form (CI-110) can be requested for use by Victim Service Providers (VSPs) by emailing the ESG-CV Grant Specialist
Vaccine Incentive Documentation	<ul style="list-style-type: none"> • Form CV-218 (only necessary for clients who receive Vaccine Incentives)

Records to Maintain – Administration

Activity	Acceptable Forms of Documentation (both Cost Incurred and Proof of Payment are required)	
	Cost Incurred	Proof of Cleared Payment
<ul style="list-style-type: none"> • Bills paid • Services performed • Materials purchased 	<ul style="list-style-type: none"> • Invoice • Receipt 	<ul style="list-style-type: none"> • Canceled checks or bank statement with ESG-CV payments highlighted
<ul style="list-style-type: none"> • Travel costs 	<ul style="list-style-type: none"> • Travel request which includes date(s) of travel, from/to, purpose of travel, supporting documentation 	<ul style="list-style-type: none"> • Canceled checks, bank with ESG-CV payments highlighted

²⁸ For Street Outreach the client's living situation must be a place not meant for human habitation.

²⁹ Not necessary for clients who are receiving no ESG-CV services other than Vaccine Incentives, Vaccine and Testing Transportation, or both. These clients can certify their homelessness status using the CV-218.

<ul style="list-style-type: none"> • Employee Compensation 	<ul style="list-style-type: none"> • Timesheets signed by supervisor and employee detailing eligible ESG-CV activities • Pay stub or payroll report from a third party listing pay periods, employee listed, last four digits of SSN 	<ul style="list-style-type: none"> • Copy of pay stub or payroll report from third party • Bank statement with ESG-CV payments highlighted
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Street Outreach Financial Process

After incurring Street Outreach expenses, grantees may submit for payment using MHDC's [grant interface](#). Using the following forms,³⁰ agencies are expected to completely fill out the online form, and then attach a pdf that includes the following documents:

- CV-212 (Completely fill out the Street Outreach expense detail tab)
- HMIS Report (For Street Outreach, this should look like a roster or engagement report that includes a date range and no identifying client information)
- CI-113 (Only required if the HMIS Report has no clients on the roster)

Common reasons that Street Outreach payment requests are discarded:

- Salaries or other eligible program expenses are incurred outside of the eligible funding period
- The date range on the HMIS report doesn't match up with the Reporting Range for Street Outreach on the CV-212
- Amount requested is greater than the amount remaining in the grant balance
- Expenses included on the Street Outreach Expense Detail are not listed as eligible in the ESG-CV Desk Guide or HUD's Consolidated Federal Regulations (CFR)
- HMIS roster has no clients and CI-113 is not included

Program Guidelines

Standards for what should be included in Street Outreach program guidelines can be found at <https://www.endhomelessnessmo.org/gceh-policies> and MHDC's [website](#). Per [24 CFR 576 Subpart E](#), every ESG-CV grantee must develop and implement program guidelines that include:

- Standards should be specific to your organization's Street Outreach program and adapted to include procedures used for evaluating the eligibility of individuals and families for assistance under the ESG-CV programs as applicable.
- Standards include procedures describing the coordination among Standard Emergency Shelter providers, Temporary Emergency Shelter providers, essential services providers, Homelessness

³⁰ The CV-212 and CI-113 can be accessed [here](#)

Prevention, and Rapid Rehousing assistance providers, other homeless assistance providers, and mainstream service and housing providers.

- Standards describe the formal termination process established by the agency that recognizes the rights of individuals affected. The grantee must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases.
- Standards describe the program participant's formal grievance process.
- Standards address the policy for participation in HMIS or comparable database.
- Standards include procedures for ensuring that clients served and activities provided with ESG-CV funds are entered into HMIS or comparable database, the timeframe for data to be entered, and the process for ensuring confidentiality of client records.
- Standards include procedures for targeting and providing services related to Street Outreach.

Standard Emergency Shelter³¹

ESG-CV funds may be used for the costs of operating a standard emergency shelter³² and providing essential services to homeless individuals and families in standard emergency shelters ([24 CFR 576.102](#)). Standard Emergency Shelter and Temporary Emergency Shelter are considered different component types and must be applied for separately.

Income

Income requirements do not apply to program participants who are being served under the Standard Emergency Shelter component.

Eligibility

Standard Emergency Shelter services are provided to persons who meet HUD's Category 1, 2, or 4 definition of homelessness.

Literally Homeless (Category 1)	Individual or family who lacks a fixed, regular, and adequate nighttime residence: <ul style="list-style-type: none"> • Has a primary nighttime residence that is a public or private place not meant for human habitation; • Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, hotels/motels paid for by charitable organizations or federal, state, and local government programs; or • Is exiting an institution where they resided for 120 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.
Imminent Risk of Homelessness (Category 2)	Individual or family who will imminently lose their primary residence, provided that: <ul style="list-style-type: none"> • Residence will be lost within 14 days of the date of application for homeless assistance; • No subsequent residence has been identified; and • Lacks resources or support networks needed to obtain other permanent housing.
Fleeing/Attempting to Flee Domestic Violence (Category 4)	Individual or family who: <ul style="list-style-type: none"> • Is fleeing/attempting to flee domestic violence; • Has no other residence; and • Lacks resources or support networks needed to obtain other permanent housing.

Eligible Activities – Essential Services

Costs associated with providing essential services to individuals and families, including:

Case Management

Staffing employees that assess, arrange, coordinate, and monitor the delivery of individualized services to meet the needs of the program participant. This can include wages and benefits for time spent

³¹ When the three words in the phrase "Standard Emergency Shelter" are capitalized, it is referring to the ESG-CV component.

³² When the three words in the phrase "standard emergency shelter" are not capitalized, it is referring to the physical structure.

providing case management services, including:

- Using the centralized or coordinated assessment system as required under [24 CFR 576.400\(d\)](#)
- Conducting the initial evaluation required under [24 CFR 576.401\(a\)](#), including verifying and documenting eligibility
- Counseling
- Developing, securing, and coordinating services and obtaining Federal, State, and local benefits
- Monitoring and evaluating program participant progress
- Providing information and referrals to other providers
- Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking
- Developing an individualized housing and service plan, including planning a path to permanent housing stability.

Childcare, Education, Employment, and Life Skills Services

Staffing for the provision of childcare services such as providing meals, snacks, and appropriate developmental activities are eligible. Children must be under the age of 13, unless they are disabled. Disabled children must be under the age of 18. The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.

Providing program participants with basic knowledge and skills so they can obtain and maintain housing is eligible. This education should be focused on instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, or General Educational Development (GED). These services or activities include:

- Screening, assessment and testing
- Individual or group instruction
- Tutoring
- Books and instructional material
- Counseling
- Referral to community resources

Providing employment assistance and job training for program participants is eligible. This can be through classroom, online, computer instruction, and/or on-the-job training. This employment assistance and job training should assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. These services or activities include:

- Acquisition of vocational licenses and/or certificates
- Employment screening, assessment, and testing
- Special training and tutoring, including literacy training and prevocational training
- Books and instructional material

- Counseling or job coaching
- Referral to community resources

Teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance use, and homelessness is eligible. These must be skills that are necessary to assist the program participant to function independently in the community, including:

- Budgeting resources
- Managing money
- Managing a household
- Resolving conflict
- Shopping for food and needed items
- Improving nutrition
- Using public transportation
- Parenting

Legal Services

Legal services are limited to those services necessary to help program participants obtain housing or keep a program participant from losing housing where they currently reside. Immigration and citizenship matters and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements are ineligible costs.

Health, Mental Health, and Substance Abuse Services

Direct outpatient treatment of medical conditions provided by licensed medical professionals (to the extent that other appropriate health services are unavailable within the community) are eligible, including:

- Assessing a program participant's health problems and developing a treatment plan
- Assisting program participants to understand their health needs
- Providing directly or assisting program participants to obtain emergency medical services
- Medication and follow-up services
- Preventive and non-cosmetic dental care

Direct outpatient treatment of mental health conditions provided by licensed medical professionals (to the extent that other appropriate health services are unavailable within the community) are eligible, including:

- Application of therapeutic processes to personal, family, situational, or occupational problems
- Crisis interventions
- Individual, family, or group therapy sessions
- Prescription of psychotropic medications

- Explanations about the use and management of medications

Substance abuse treatment services designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors that are provided by licensed or certified professionals (to the extent that other appropriate health services are unavailable within the community) are eligible, including:

- Client intake and assessment
- Outpatient treatment for up to 30 days
- Group and individual counseling and drug testing
- Inpatient detoxification and other inpatient drug or alcohol treatment **ARE NOT** eligible costs

Personal Protective Equipment (PPE)

In [CPD-21-08](#) HUD authorized ESG-CV funds to be used under [24 CFR 576.102\(a\)\(1\)](#) to purchase equipment used for protection from coronavirus by both Standard Emergency Shelter service providers and eligible clients, including:

- Face masks or shields
- Hand sanitizer
- Disposable gloves

Transportation

Transportation costs of a program participant's travel to and from medical care, employment, child care, or other eligible essential services facilities are eligible,³³ including:

- Public transportation for program participants to and from emergency shelters or other service facilities
- Travel costs for service workers to accompany or assist program participants to use public transportation to and from emergency shelters or other service facilities³⁴
- Travel costs for service workers to visit program participants using their own vehicle³⁵
- Costs associated with purchasing or leasing a vehicle **ARE NOT** eligible

Services for Special Populations

Any of the essential services listed above that have been tailored to address the special needs of homeless youth, victims of domestic violence and related crimes/threats, and/or people living with

³³ Transportation for coronavirus testing and vaccination is eligible under Standard Emergency Shelter, but is billed under a separate subcomponent than other Standard Emergency Shelter transportation costs.

³⁴ This can be reimbursed using the Federal mileage rate.

³⁵ This can be reimbursed using the Federal mileage rate.

HIV/AIDS who are literally homeless.

Eligible Activities – Operations

Expenses to operate and maintain standard emergency shelters, including:

Minor or Routine Maintenance

Repairing appliances or portions of the structure that are in disrepair within the standard emergency shelter is eligible. Replacing appliances or portions of the structure within the standard emergency shelter is eligible if the existing appliances or portions of the structure is unsafe, unusable, and/or more expensive to continue using than to replace. If the grantee is replacing appliances or portions of the structure, they must have both written and photographic documentation on how it was unsafe, unusable, and/or more expensive to continue using than to replace. If the replacement or upgrade requires outside contracting, the outside contractor should be the one to provide the written documentation. Eligible costs include:

- Staffing or contracting of qualified persons for repairs
- Installation, appliances, and supplies for replacements
- Installation, appliances, and supplies for non-replacement purposes³⁶ **ARE NOT** considered minor or routine maintenance
- Renovation, major rehab, and conversion **ARE NOT** eligible

Rent

The rent for the facility being used as a standard emergency shelter is eligible. If only a portion of the facility is being used as a standard emergency shelter, then only the rent for that portion of the facility is eligible for reimbursement under the Standard Emergency Shelter component. Rent for administrative office spaces within the same facility are not eligible under the Standard Emergency Shelter component if they are not used solely for the administration of the standard emergency shelter. The portion of rent that is allowable is proportionate to the percentage of the facility's total square footage that is being used as a standard emergency shelter. The calculation of the portion of the rent being billed under Standard Emergency Shelter should be documented in a written memo.

Security

The purchase, installation, and maintaining of security-related items are eligible, including:

- Security cameras
- Security system software and subscriptions

³⁶ *Non-replacement purposes means the introduction of appliances or portions of the structure that were not present in the standard emergency shelter beforehand (e.g., constructing a new wall, installing a dishwasher when there was not one in the facility already, etc.).*

- Locks for windows or doors
- Light fixtures and flashlights

Fuel

Fuel for the operation of machines and appliances necessary for the maintaining and operation of the standard emergency shelter, including:

- Lawn mowers
- Leaf blowers
- Power washers
- Non-street legal vehicles
- Gas for street legal vehicles **IS NOT** eligible³⁷

Insurance

The insurance for the facility being used as a standard emergency shelter is eligible. If only a portion of the facility is being used as a standard emergency shelter, then only the insurance for that portion of the facility is eligible for reimbursement under the Standard Emergency Shelter component. Insurance for administrative office spaces within the same facility are not eligible under the Standard Emergency Shelter component if they are not used solely for the administration of the standard emergency shelter. The portion of insurance that is allowable is proportionate to the percentage of the facility's total square footage that is being used as a standard emergency shelter. The calculation of the portion of the insurance being billed under Standard Emergency Shelter should be documented in a written memo.

Utilities

The utilities for the facility being used as a standard emergency shelter are eligible. If only a portion of the facility is being used as a standard emergency shelter, then only the utilities for that portion of the facility are eligible for reimbursement under the Standard Emergency Shelter component. Utilities for administrative office spaces within the same facility are not eligible under the Standard Emergency Shelter component if they are not used solely for the administration of the standard emergency shelter. The portion of utilities that are allowable is proportionate to the percentage of the facility's total square footage that is being used as a standard emergency shelter. The calculation of the portion of the utilities being billed under Standard Emergency Shelter should be documented in a written memo. Eligible utilities include:

- | | |
|---------------|----------|
| • Electricity | • Water |
| • Gas | • Sewage |

³⁷ Use of street legal vehicles can be reimbursed as [transportation](#) costs with the Federal mileage rate under Essential Services.

- Trash
- Internet
- Phone
- Lawn service
- Pest control

Food for Shelter Residents

The purchase of food and supplies for food storage, preparation, and serving are eligible. This can only be for food that is being served to Standard Emergency Shelter eligible clients within a standard emergency shelter.

Furniture and Furnishings

Furniture and furnishings necessary for the operation of a standard emergency shelter are eligible. This can only be for furniture and furnishings that are used exclusively within the standard emergency shelter and for Standard Emergency Shelter services.

Equipment

Equipment necessary for the operation of a standard emergency shelter are eligible. This can only be for equipment that is used exclusively for Standard Emergency Shelter services.

Supplies

Supplies necessary for the operation of a standard emergency shelter are eligible. This can only be for supplies that are used exclusively for Standard Emergency Shelter services.

Hotel or Motel Vouchers

When no appropriate standard emergency shelter is available, the grantee may pay for a hotel or motel room directly or through a hotel or motel voucher. Additionally, funds can be used to pay for cleaning of hotel and motel rooms used by program participants as well as to repair damages caused by program participants above normal wear and tear of the room. Essential Services that are eligible under the Standard Emergency Shelter component can be provided to program participants staying in hotels and motels that are being funded under the Standard Emergency Shelter component.

Eligible Activities – Disease Mitigation Training

Training specifically on infectious disease prevention and mitigation for ESG-CV funded staff working directly to prevent, prepare for, and respond to coronavirus among persons who are homeless with Standard Emergency Shelter activities.

Eligible Activities – Hazard Pay

Hazard pay for staff working directly to prevent, prepare for, and respond to coronavirus among persons who are homeless with Standard Emergency Shelter activities. This includes any staff who are putting themselves in proximity to persons with coronavirus or working in locations with a high likelihood of

contracting coronavirus for Standard Emergency Shelter activities. Hazard pay should only be provided to staff for the hours in which they putting themselves at risk while providing Standard Emergency Shelter services. This time should be tracked separately on timesheets from time spent providing these same services without putting themselves at risk. The maximum amount that can be provided to staff for Hazard Pay is 50 percent (50%) of their hourly wage (or equivalent) in addition to their regular wage. The regular wage should be billed under Essential Services, while the bonus of up to 50 percent (50%) of their hourly wage (or equivalent) should be charged under Hazard Pay.

Eligible Activities – Volunteer Incentives

Providing reasonable incentives for volunteers who are currently helping to provide necessary Standard Emergency Shelter services during the coronavirus outbreak. Incentives can be provided for volunteering done in the past by an individual (within the grant period), but only if they are continuing to volunteer after the payment of the incentive. Timesheets or sign-in sheets should be kept to track the volunteer's involvement. Eligible incentives include:

- Cash
- Gift Cards
- Meals immediately before, during, or immediately after the time spent volunteering
- Other³⁸

Eligible Activities – Vaccine Incentives

Making direct, cash payments of up to \$50.00 per dose to Standard Emergency Shelter eligible clients as an incentive for receiving a coronavirus vaccine, for a maximum of \$100.00 in total cash payments per client. For single-dose vaccines, the client can receive one cash payment of \$50.00. For two-dose vaccines, the client can receive two separate cash payments of \$50.00 each.³⁹ Clients must present an official COVID-19 Record Card as proof that they received the dose. ESG-CV funds may only be used for vaccine incentives to the extent that other vaccine incentives are inaccessible or unavailable to people experiencing homelessness within the community. Grantees must certify that the client has not received any other vaccine incentive for each dose that the client is receiving a cash payment for using the CV-218 Vaccine Incentive Documentation form. Clients receiving no ESG-CV services other than Vaccine Incentives, Vaccine and Testing Transportation, or both do not need to fill out the CV-104 to certify their homelessness status. These clients can certify their homelessness status using the CV-218 instead.

Eligible Activities - Vaccine and Testing Transportation

Transportation costs specifically for the transportation of Standard Emergency Shelter eligible clients to and from coronavirus testing and vaccination sites is eligible as a separate subcomponent under

³⁸ Other forms of incentives may be use if approved beforehand by the ESG-CV Grant Specialist.

³⁹ These cash payments can only be made to clients after they receive the dose. Clients who are scheduled to receive a dose may not be paid in advance for that dose.

Standard Emergency Shelter, including:

- Costs of transporting individuals and families using vehicles owned by the grantee to and from coronavirus testing and vaccination sites⁴⁰
- Cost of public transportation for individuals and families to and from coronavirus testing and vaccination sites
- Cost for staff to accompany or assist participants to use public transportation to and from coronavirus testing and vaccination sites
- Costs associated with purchasing or leasing a vehicle **ARE NOT** eligible

Clients receiving no ESG-CV services other than Vaccine Incentives, Vaccine and Testing Transportation, or both do not need to fill out the CV-104 to certify their homelessness status. These clients can certify their homelessness status using the CV-218 instead.

Habitability Standards

All standard emergency shelters funded with ESG-CV must meet and document basic habitability standards as detailed in [24 CFR 576.403](#).

Minimum Shelter Standards

Per [24 CFR 576.403\(b\)](#), standard emergency shelters must meet and document minimum safety, sanitation, and privacy standards related to the following topics:

- 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

Records to Maintain - Program Participants

Record	Criteria
Homelessness Status and Eligibility Certification	<ul style="list-style-type: none"> • Form CV-104⁴¹
Initial Consultation Documentation	<ul style="list-style-type: none"> • Agency Intake Documentation

⁴⁰ This can be reimbursed using the Federal mileage rate.

⁴¹ Not necessary for clients who are receiving no ESG-CV services other than Vaccine Incentives, Vaccine and Testing Transportation, or both. These clients can certify their homelessness status using the CV-218.

Case Management Documentation	<ul style="list-style-type: none"> Assessing, arranging, coordinating, and monitoring delivery of services to facilitate housing stability
Habitability Inspection	<ul style="list-style-type: none"> Form ESG-205 (Standard Emergency Shelter version)
Lead-based Paint Inspection	<ul style="list-style-type: none"> Form ESG-207, ESG-208
Consent Form	<ul style="list-style-type: none"> Form CI-108 or CI-108-DV
Non-Identifying Identification Certification	<ul style="list-style-type: none"> Form (CI-110) can be requested for use by Victim Service Providers (VSPs) by emailing the ESG-CV Grant Specialist
Vaccine Incentive Documentation	<ul style="list-style-type: none"> Form CV-218 (only necessary for clients who receive Vaccine Incentives)

Records to Maintain – Administration

Activity	Acceptable Forms of Documentation (both Cost Incurred and Proof of Payment are required)	
	Cost Incurred	Proof of Cleared Payment
<ul style="list-style-type: none"> Bills paid Services performed Materials purchased 	<ul style="list-style-type: none"> Invoice Receipt 	<ul style="list-style-type: none"> Canceled checks or bank statement with ESG-CV payments highlighted
<ul style="list-style-type: none"> Travel costs 	<ul style="list-style-type: none"> Travel request which includes date(s) of travel, from/to, purpose of travel, supporting documentation 	<ul style="list-style-type: none"> Canceled checks, bank with ESG-CV payments highlighted
<ul style="list-style-type: none"> Employee Compensation 	<ul style="list-style-type: none"> Timesheets signed by supervisor and employee detailing eligible ESG-CV activities Pay stub or payroll report from a third party listing pay periods, employee listed, last four digits of SSN 	<ul style="list-style-type: none"> Copy of pay stub or payroll report from third party Bank statement with ESG-CV payments highlighted

Compliance Process

Standard emergency shelters funded with ESG-CV must meet basic habitability standards as detailed in [24 CFR 576.403\(b\)](#). Standard emergency shelters will be inspected during site visits to ensure compliance with the minimum habitability standards. The Compliance Reviewer will inspect the building exterior, building systems, parking lots/driveways, playground, lawn, a random selection of sleeping rooms, and any common areas on the property. The Compliance Reviewer will note any deficiencies found in the post monitoring letter and the grantee will need to provide documentation and/or photographs indicating that the issues have been corrected. Grantees are responsible for notifying clients, prior to the site visit that an MHDC staff member will be on site for an inspection of the shelter.

Standard Emergency Shelter Financial Process

After incurring Standard Emergency Shelter expenses, grantees may submit for payment using MHDC's [grant interface](#). Using the following forms,⁴² agencies are expected to completely fill out the online form, and then attach a pdf that includes the following documents:

- CV-212 (Completely fill out the Standard Emergency Shelter expense detail tab)
- Make sure that expenses are properly listed on this form under their corresponding category
- Standard Emergency Shelter HMIS report (either a roster or bed/nights report that includes a date range and no identifying client information)

Common reasons that Standard Emergency Shelter payment requests are discarded:

- Salaries or other eligible program expenses are incurred outside of the eligible funding period
- The date range on the HMIS report doesn't match up with the Reporting Range for Standard Emergency Shelter on the CV-212
- Amount requested is greater than the amount remaining in the grant balance
- Expenses included on the Standard Emergency Shelter Expense Detail are not listed as eligible in the ESG-CV Desk Guide or HUD's Consolidated Federal Regulations (CFR)

Program Guidelines

Standards for what must be included in Standard Emergency Shelter program guidelines can be found on MHDC's [website](#). Per [24 CFR 576 Subpart E](#), every ESG-CV grantee must develop and implement program guidelines that include:

- Policy for admission, diversion, referral, and discharge by standard emergency shelters assisted under ESG-CV, including standards regarding length of stay limits, if any, and safeguards to meet the safety and shelter needs of victims of domestic violence, sexual assault, etc.
- Policy for admission, diversion, referral, and discharge by standard emergency shelters including standards regarding length of stay limits, if any, and safeguards to meet the safety and shelter needs of individuals and families who have the highest barriers to housing and are likely to be homeless the longest.
- Procedure for assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to Standard Emergency Shelter.

⁴² The CV-212 can be accessed [here](#).

Temporary Emergency Shelter⁴³

As permitted by the CARES Act, ESG-CV funds may be used to pay for temporary emergency shelters⁴⁴ for individuals and families experiencing homelessness in order to prevent, prepare for, and respond to coronavirus. Standard Emergency Shelter and Temporary Emergency Shelter are considered different component types and must applied for separately.

Status Verification

A temporary emergency shelter can be any structure or portion of a structure, which is used for a limited period of time because of a crisis, such as a natural disaster or public health emergency, to provide shelter for individuals and families displaced from their normal place of residence or sheltered or unsheltered locations. In order to be a verified temporary emergency shelter the shelter must have been determined by State or local health officials to be necessary to prevent, prepare for, and respond to coronavirus. In order for a temporary emergency shelter to document this determination, the CV-215 Temporary Emergency Shelter Status Verification form must be completed and signed by both the grantee and a State or local health official. **Organizations will not be able to receive reimbursement for Temporary Emergency Shelter expenses until this determination has been documented and approved by MHDC.**

Income

Income requirements do not apply to program participants who are being served under the Temporary Emergency Shelter component.

Eligibility

Temporary Emergency Shelter services are provided to persons who meet HUD's Category 1, 2, or 4 definition of homelessness.

Literally Homeless (Category 1)	Individual or family who lacks a fixed, regular, and adequate nighttime residence: <ul style="list-style-type: none"> • Has a primary nighttime residence that is a public or private place not meant for human habitation; • Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, hotels/motels paid for by charitable organizations or federal, state, and local government programs; or • Is exiting an institution where he/she has resided for 120 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.
Imminent Risk of Homelessness (Category 2)	Individual or family who will imminently lose their primary residence, provided that: <ul style="list-style-type: none"> • Residence will be lost within 14 days of the date of application for homeless assistance; • No subsequent residence has been identified; and • Lacks resources or support networks needed to obtain other permanent housing.

⁴³ When the three words in the phrase "Temporary Emergency Shelter" are capitalized, it is referring to the ESG-CV component.

⁴⁴ When the three words in the phrase "temporary emergency shelter" are not capitalized, it is referring to the physical structure.

Fleeing/Attempting to Flee Domestic Violence (Category 4)	Individual or family who: <ul style="list-style-type: none"> • Is fleeing/attempting to flee domestic violence; • Has no other residence; and • Lacks resources or support networks needed to obtain other permanent housing.
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Eligible Activities – Essential Services

Costs associated with providing services to individuals and families, including:

Case Management

Staffing employees that assess, arrange, coordinate, and monitor the delivery of individualized services to meet the needs of the program participant. This can be for wages and benefits for time spent providing case management services, including:

- Using the centralized or coordinated assessment system as required under [24 CFR 576.400\(d\)](#)
- Conducting the initial evaluation required under [24 CFR 576.401\(a\)](#), including verifying and documenting eligibility
- Counseling
- Developing, securing, and coordinating services and obtaining Federal, State, and local benefits
- Monitoring and evaluating program participant progress
- Providing information and referrals to other providers
- Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking
- Developing an individualized housing and service plan, including planning a path to permanent housing stability

Childcare, Education, Employment, and Life Skills Services

Staffing for the provision of childcare services such as providing meals, snacks, and appropriate developmental activities are eligible. The children must be under the age of 13, unless they are disabled. Disabled children must be under the age of 18. The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.

Providing program participants with basic knowledge and skills so they can obtain and maintain housing is eligible. This education should be focused on instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, or General Educational Development (GED). These services or activities include:

- Screening, assessment and testing
- Tutoring
- Individual or group instruction
- Books and instructional material

- Counseling
- Referral to community resources

Providing employment assistance and job training for program participants is eligible. This can be through classroom, online, computer instruction, and/or on-the-job training. This employment assistance and job training should assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. These services or activities include:

- Acquisition of vocational licenses and/or certificates
- Employment screening, assessment, and testing
- Special training and tutoring, including literacy training and prevocational training
- Books and instructional material
- Counseling or job coaching
- Referral to community resources

Teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance use, and homelessness is eligible. These must be skills that are necessary to assist the program participant to function independently in the community, including:

- Budgeting resources
- Managing money
- Managing a household
- Resolving conflict
- Shopping for food and needed items
- Improving nutrition
- Using public transportation
- Parenting

Legal Services

Legal services are limited to those services necessary to help program participants obtain housing or keep a program participant from losing housing where they currently reside. Immigration and citizenship matters and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements are ineligible costs.

Health, Mental Health, and Substance Abuse Services

Direct outpatient treatment of medical conditions provided by licensed medical professionals (to the extent that other appropriate health services are unavailable within the community) are eligible, including:

- Assessing a program participant's health problems and developing a treatment plan
- Assisting program participants to understand their health needs
- Providing directly or assisting program participants to obtain emergency medical services

- Medication and follow-up services
- Preventive and non-cosmetic dental care

Direct outpatient treatment of mental health conditions provided by licensed medical professionals (to the extent that other appropriate health services are unavailable within the community) are eligible, including:

- Application of therapeutic processes to personal, family, situational, or occupational problems
- Crisis interventions
- Individual, family, or group therapy sessions
- Prescription of psychotropic medications
- Explanations about the use and management of medications

Substance abuse treatment services designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors that are provided by licensed or certified professionals (to the extent that other appropriate health services are unavailable within the community) are eligible, including:

- Client intake and assessment
- Outpatient treatment for up to 30 days
- Group and individual counseling and drug testing
- Inpatient detoxification and other inpatient drug or alcohol treatment **ARE NOT** eligible costs

Personal Protective Equipment (PPE)

In [CPD-21-08](#) HUD authorized ESG-CV funds to be used under [24 CFR 576.102\(a\)\(1\)](#) to purchase equipment used for protection from coronavirus by both Temporary Emergency Shelter service providers and eligible clients, including:

- Face masks or shields
- Hand sanitizer
- Disposable gloves

Transportation

Transportation costs of a program participant's travel to and from medical care, employment, child care, or other eligible essential services facilities are eligible,⁴⁵ including:

- Public transportation for program participants to and from emergency shelters or other service

⁴⁵ Transportation for coronavirus testing and vaccination is eligible under Temporary Emergency Shelter, but is billed under a separate subcomponent than other Temporary Emergency Shelter transportation costs.

facilities

- Travel costs for service workers to accompany or assist program participants to use public transportation to and from emergency shelters or other service facilities⁴⁶
- Travel costs for service workers to visit program participants using their own vehicle⁴⁷
- Costs associated with purchasing or leasing a vehicle **ARE NOT** eligible

Housing Search, Placement, and Counseling Services

Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing are eligible, including:

- Assessment of housing barriers, needs, and preferences
- Development of an action plan for locating housing
- Housing search
- Outreach to and negotiation with owners
- Assistance with submitting rental applications and understanding leases
- Assessment of housing for compliance with ESG-CV requirements for habitability, lead-based paint, and rent reasonableness
- Assistance with obtaining utilities and making moving arrangements

Providing housing counseling is also eligible for Temporary Emergency Shelter clients. Housing counseling is independent, expert advice customized to the need of the consumer to address the consumer's housing barriers and to help achieve their housing goals and must include the following processes:

- Intake
- Financial and housing affordability analysis
- Action plan, except for reverse mortgage counseling
- Reasonable effort to have follow-up communication with the client when possible

Services for Special Populations

Any of the essential services listed above that have been tailored to address the special needs of homeless youth, victims of domestic violence and related crimes/threats, and/or people living with HIV/AIDS who are literally homeless.

⁴⁶ This can be reimbursed using the Federal mileage rate.

⁴⁷ This can be reimbursed using the Federal mileage rate.

Eligible Activities – Operations

Expenses to operate and maintain temporary emergency shelters, including:

Minor or Routine Maintenance

Repairing appliances or portions of the structure that are in disrepair within the temporary emergency shelter is eligible. Replacing appliances or portions of the structure within the temporary emergency shelter is eligible if the existing appliances or portions of the structure is unsafe, unusable, and/or more expensive to continue using than to replace. If the grantee is replacing appliances or portions of the structure, they must have both written and photographic documentation on how it was unsafe, unusable, and/or more expensive to continue using than to replace. If the replacement or upgrade requires outside contracting, the outside contractor must be the one to provide the written documentation. Eligible costs include:

- Staffing or contracting of qualified persons for repairs
- Installation, appliances, and supplies for replacements
- Installation, appliances, and supplies for non-replacement purposes⁴⁸ **ARE NOT** considered minor or routine maintenance
- Renovation, major rehab, and conversion **ARE NOT** eligible

Rent

The rent for the facility being used as a temporary emergency shelter is eligible. If only a portion of the facility is being used as a temporary emergency shelter, then only the rent for that portion of the facility is eligible for reimbursement under the Temporary Emergency Shelter component. Rent for administrative office spaces within the same facility are not eligible under the Temporary Emergency Shelter component if they are not used solely for the administration of the temporary emergency shelter. The portion of rent that is allowable is proportionate to the percentage of the facility's total square footage that is being used as a temporary emergency shelter. The calculation of the portion of the rent being billed under Temporary Emergency Shelter should be documented in a written memo.

Security

The purchase, installation, and maintaining of security-related items are eligible, including:

- Security cameras
- Security system software and subscriptions
- Locks for windows or doors

⁴⁸ Non-replacement purposes means the introduction of appliances or portions of the structure that were not present in the temporary emergency shelter beforehand (e.g., constructing a new wall, installing a dishwasher when there was not one in the facility already, etc.).

- Light fixtures and flashlights

Fuel

Fuel for the operation of machines and appliances necessary for the maintaining and operation of the temporary emergency shelter, including:

- Lawn mowers
- Leaf blowers
- Power washers
- Non-street legal vehicles
- Gas for street legal vehicles **IS NOT** eligible⁴⁹

Insurance

The insurance for the facility being used as a temporary emergency shelter is eligible. If only a portion of the facility is being used as a temporary emergency shelter, then only the insurance for that portion of the facility is eligible for reimbursement under the Temporary Emergency Shelter component. Insurance for administrative office spaces within the same facility are not eligible under the Temporary Emergency Shelter component if they are not used solely for the administration of the temporary emergency shelter. The portion of insurance that is allowable is proportionate to the percentage of the facility's total square footage that is being used as a temporary emergency shelter. The calculation of the portion of the insurance being billed under Temporary Emergency Shelter should be documented in a written memo.

Utilities

The utilities for the facility being used as a temporary emergency shelter are eligible. If only a portion of the facility is being used as a temporary emergency shelter, then only the utilities for that portion of the facility are eligible for reimbursement under the Temporary Emergency Shelter component. Utilities for administrative office spaces within the same facility are not eligible under the Temporary Emergency Shelter component if they are not used solely for the administration of the temporary emergency shelter. The portion of utilities that are allowable is proportionate to the percentage of the facility's total square footage that is being used as a temporary emergency shelter. The calculation of the portion of the utilities being billed under Temporary Emergency Shelter should be documented in a written memo.

Eligible utilities include:

- | | |
|---------------|------------|
| • Electricity | • Sewage |
| • Gas | • Trash |
| • Water | • Internet |

⁴⁹ Use of street legal vehicles can be reimbursed as [transportation](#) costs with the Federal mileage rate under Essential Services.

- Phone
- Pest control
- Lawn service

Food for Shelter Residents

The purchase of food and supplies for food storage, preparation, and serving are eligible. This can only be for food that is being served to Temporary Emergency Shelter eligible clients within a temporary emergency shelter.

Furniture and Furnishings

Furniture and furnishings necessary for the operation of a temporary emergency shelter are eligible. This can only be for furniture and furnishings that are used exclusively within the temporary emergency shelter and for Temporary Emergency Shelter services.

Equipment

Equipment necessary for the operation of a temporary emergency shelter are eligible. This can only be for equipment that is used exclusively for Temporary Emergency Shelter services.

Supplies

Supplies necessary for the operation of a temporary emergency shelter are eligible. This can only be for supplies that are used exclusively for Temporary Emergency Shelter services.

Hotel or Motel Vouchers

When no appropriate temporary emergency shelter is available, the grantee may pay for a hotel or motel room directly or through a hotel or motel voucher. Additionally, funds can be used to pay for cleaning of hotel and motel rooms used by program participants as well as to repair damages caused by program participants above normal wear and tear of the room. Essential Services that are eligible under the Temporary Emergency Shelter component can be provided to program participants staying in hotels and motels that are being funded under the Temporary Emergency Shelter component.

Eligible Activities - Leasing

Leasing existing real property or temporary structures to be used as temporary emergency shelters is eligible expense. Before requesting reimbursement for these expenses, grantees must first receive approval from the ESG-CV Grant Specialist.

Eligible Activities – Disease Mitigation Training

Training specifically on infectious disease prevention and mitigation for ESG-CV funded staff working directly to prevent, prepare for, and respond to coronavirus among persons who are homeless with Temporary Emergency Shelter activities.

Eligible Activities - Hazard Pay

Hazard pay for staff working directly to prevent, prepare for, and respond to coronavirus among persons who are homeless with Temporary Emergency Shelter activities. This includes any staff who are putting themselves in proximity to persons with coronavirus or working in locations with a high likelihood of contracting coronavirus for Temporary Emergency Shelter activities. Hazard pay should only be provided to staff for the hours in which they putting themselves at risk while providing Temporary Emergency Shelter services. This time should be tracked separately on timesheets from time spent providing these same services without putting themselves at risk. The maximum amount that can be provided to staff for Hazard Pay is 50 percent (50%) of their hourly wage (or equivalent) in addition to their regular wage. The regular wage should be billed under Essential Services, while the bonus of up to 50 percent (50%) of their hourly wage (or equivalent) should be charged under Hazard Pay.

Eligible Activities - Volunteer Incentives

Providing reasonable incentives for volunteers who are currently helping to provide necessary Temporary Emergency Shelter during the coronavirus outbreak. Incentives can be provided for volunteering done in the past by an individual (within the grant period), but only if they are continuing to volunteer after the payment of the incentive. Timesheets or sign-in sheets should be kept to track the volunteer's involvement. Eligible incentives include:

- Cash
- Gift cards
- Meals immediately before, during, or immediately after the time spent volunteering
- Other⁵⁰

Eligible Activities - Vaccine Incentives

Making direct, cash payments of up to \$50.00 per dose to Temporary Emergency Shelter eligible clients as an incentive for receiving a coronavirus vaccine, for a max of \$100.00 in total cash payments per client. For single-dose vaccines, the client can receive one cash payment of \$50.00. For two-dose vaccines, the client can receive two separate cash payments of \$50.00 each.⁵¹ Clients must present an official COVID-19 Record Card as proof that they received the dose. ESG-CV funds may only be used for vaccine incentives to the extent that other vaccine incentives are inaccessible or unavailable to people experiencing homelessness within the community. Grantees must certify that the client has not received any other vaccine incentive for each dose that the client is receiving a cash payment for using the CV-218 Vaccine Incentive Documentation form. Clients receiving no ESG-CV services other than Vaccine Incentives, Vaccine and Testing Transportation, or both do not need to fill out the CV-104 to certify their

⁵⁰ Other forms of incentives may be use if approved beforehand by the ESG-CV Grant Specialist.

⁵¹ These cash payments can only be made to clients after they receive the dose. Clients who are scheduled to receive a dose may not be paid in advance for that dose.

homelessness status. These clients can certify their homelessness status using the CV-218 instead.

Eligible Activities - Vaccine and Testing Transportation

Transportation costs specifically for the transportation of Temporary Emergency Shelter eligible clients to and from coronavirus testing and vaccination sites is eligible as a separate subcomponent under Temporary Emergency Shelter, including:

- Costs of transporting individuals and families using vehicles owned by the grantee to and from coronavirus testing and vaccination sites⁵²
- Cost of public transportation for individuals and families to and from coronavirus testing and vaccination sites
- Cost for staff to accompany or assist participants to use public transportation to and from coronavirus testing and vaccination sites
- Costs associated with purchasing or leasing a vehicle **ARE NOT** eligible

Clients receiving no ESG-CV services other than Vaccine Incentives, Vaccine and Testing Transportation, or both do not need to fill out the CV-104 to certify their homelessness status. These clients can certify their homelessness status using the CV-218 instead.

Habitability Standards

Temporary emergency shelters are required to meet the lead-based paint and remediation requirements of [24 CFR 576.403\(a\)](#), but are not required to meet any of the other basic habitability standards as detailed in [24 CFR 576.403](#) if they have been determined by State or local health officials to be necessary to prevent, prepare for, and respond to coronavirus. Grantees must still comply with nondiscrimination and applicable accessibility requirements, including requirements under Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, the Fair Housing Act, and their implementing regulations.

Records to Maintain - Program Participants

Record	Criteria
Homelessness Status and Eligibility Certification	<ul style="list-style-type: none"> • Form CV-104⁵³
Initial Consultation Documentation	<ul style="list-style-type: none"> • Agency Intake Documentation
Case Management Documentation	<ul style="list-style-type: none"> • Assessing, arranging, coordinating, and monitoring delivery of services to facilitate housing stability

⁵² This can be reimbursed using the Federal mileage rate.

⁵³ Not necessary for clients who are receiving no ESG-CV services other than Vaccine Incentives, Vaccine and Testing Transportation, or both. These clients can certify their homelessness status using the CV-218.

Lead-based Paint Inspection	<ul style="list-style-type: none"> Form ESG-207, ESG-208
Consent Form	<ul style="list-style-type: none"> Form CI-108 or CI-108-DV
Non-Identifying Identification Certification	<ul style="list-style-type: none"> Form (CI-110) can be requested for use by Victim Service Providers (VSPs) by emailing the ESG-CV Grant Specialist
Vaccine Incentive Documentation	<ul style="list-style-type: none"> Form CV-218 (only necessary for clients who receive Vaccine Incentives)

Records to Maintain – Administration

Activity	Acceptable Forms of Documentation (both Cost Incurred and Proof of Payment are required)	
	Cost Incurred	Proof of Cleared Payment
<ul style="list-style-type: none"> Bills paid Services performed Materials purchased 	<ul style="list-style-type: none"> Invoice Receipt 	<ul style="list-style-type: none"> Canceled checks or bank statement with ESG-CV payments highlighted
<ul style="list-style-type: none"> Travel costs 	<ul style="list-style-type: none"> Travel request which includes date(s) of travel, from/to, purpose of travel, supporting documentation 	<ul style="list-style-type: none"> Canceled checks, bank with ESG-CV payments highlighted
<ul style="list-style-type: none"> Employee Compensation 	<ul style="list-style-type: none"> Timesheets signed by supervisor and employee detailing eligible ESG-CV activities Pay stub or payroll report from a third party listing pay periods, employee listed, last four digits of SSN 	<ul style="list-style-type: none"> Copy of pay stub or payroll report from third party Bank statement with ESG-CV payments highlighted

Compliance Process

Temporary emergency shelters that have been determined by State or local health officials to be necessary to prevent, prepare for, and respond to coronavirus are exempt from the basic habitability standards outlined in [24 CFR 576.403\(b\)](#). Temporary emergency shelters are still subject to the lead-based paint remediation and disclosure standards outlined in [24 CFR 576.403\(a\)](#).

Temporary Emergency Shelter Financial Process

After incurring Temporary Emergency Shelter expenses, grantees may submit for payment using MHDC's [grant interface](#). Using the following forms,⁵⁴ agencies are expected to completely fill out the online form, and then attach a pdf that includes the following documents:

- CV-212 (Completely fill out the Temporary Emergency Shelter expense detail tab)

⁵⁴ The CV-212 can be accessed [here](#).

- Make sure that expenses are properly listed on this form under their corresponding category
- Temporary Emergency Shelter HMIS Report (either a roster or bed/nights report that includes a date range and no identifying client information)

Common reasons that Temporary Emergency Shelter payment requests are discarded:

- Salaries or other eligible program expenses are incurred outside of the eligible funding period
- The date range on the HMIS report doesn't match up with the date ranges of the expenses on the CV-212 Temporary Emergency Shelter Expense Detail form
- Amount requested is greater than the amount remaining in the grant balance
- Expenses included on the Temporary Emergency Shelter Expense Detail are not listed as eligible in the ESG-CV Desk Guide or HUD's Consolidated Federal Regulations (CFR)

Program Guidelines

Standards for what should be included in Temporary Emergency Shelter program guidelines can be found on MHDC's [website](#). Per [24 CFR 576 Subpart E](#), every ESG-CV grantee must develop and implement program guidelines that include:

- Policy for admission, diversion, referral, and discharge by temporary emergency shelters assisted under ESG-CV, including standards regarding length of stay limits, if any, and safeguards to meet the safety and shelter needs of victims of domestic violence, sexual assault, etc.
- Policy for admission, diversion, referral, and discharge by temporary emergency shelters including standards regarding length of stay limits, if any and safeguards to meet the safety and shelter needs of individuals and families who have the highest barriers to housing and are likely to be homeless the longest.
- Procedure for assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to Temporary Emergency Shelter.

Homelessness Prevention

To prevent households from becoming literally homeless ([24 CFR 576.103](#)).

Eligibility

Participants must meet Category 2 or 4 of the homeless definitions or Category 1 of the at-risk homeless definition, and have an annual income below 50 percent (50%) of area median income (AMI), as determined by HUD, at initial evaluation, and all re-evaluations.

Imminent Risk of Homelessness (Category 2)	Individual or family who will imminently lose their primary residence, provided that: <ul style="list-style-type: none"> • Residence will be lost within 14 days of the date of application for homeless assistance; • No subsequent residence has been identified; and • Lacks resources or support networks needed to obtain other permanent housing.
Fleeing/Attempting to Flee Domestic Violence (Category 4)	Individual or family who: <ul style="list-style-type: none"> • Is fleeing/attempting to flee domestic violence; • Has no other residence; and • Lacks resources or support networks needed to obtain other permanent housing.
At Risk (Category 1)	Individual or family who: <ul style="list-style-type: none"> • Has an annual income below 50 percent (50%) of median family income for the area; and • Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the “homeless” definition; and • Meets one of the following conditions: <ul style="list-style-type: none"> ○ Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; or ○ Is living in the home of another because of economic hardship; or ○ Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; or ○ Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; or ○ Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; or ○ Is exiting a publicly funded institution or system of care; or ○ Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient’s approved Con Plan

Eligible Activities – Housing Relocation and Stabilization Services

Costs associated with providing housing relocation and stabilization services to individuals and families, including:

Housing Search and Placement Services

Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing are eligible, including:

- Assessment of housing barriers, needs, and preferences
- Development of an action plan for locating housing
- Housing search
- Outreach to and negotiation with owners
- Assistance with submitting rental applications and understanding leases
- Assessment of housing for compliance with ESG-CV requirements for habitability, lead-based paint, and rent reasonableness
- Assistance with obtaining utilities and making moving arrangements
- Tenant counseling

Housing Stability Case Management

Assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing are eligible. This assistance cannot exceed 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. Component services and activities consist of:

- Using the centralized or coordinated assessment system as required under [24 CFR 576.400\(d\)](#) to evaluate individuals and families applying for or receiving Homelessness Prevention
- Conducting the initial evaluation required under [24 CFR 576.401\(a\)](#), including verifying and documenting eligibility, for individuals and families applying for Homelessness Prevention
- Counseling
- Developing, securing, and coordinating services and obtaining Federal, State, and local benefits
- Monitoring and evaluating program participant progress
- Providing information and referrals to other providers
- Developing an individualized housing and service plan, including planning a path to permanent housing stability
- Conducting re-evaluations required under [24 CFR 576.401\(b\)](#)
- Using the centralized or coordinated assessment system as required under [24 CFR 576.400\(d\)](#)

- Conducting the initial evaluation required under [24 CFR 576.401\(a\)](#), including verifying and documenting eligibility
- Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking
- Developing an individualized housing and service plan, including planning a path to permanent housing stability

Mediation

Paying for mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the program participant from losing permanent housing in which the program participant currently resides, is eligible.

Legal Services

Legal services are limited to those services necessary to help program participants obtain housing or keep a program participant from losing housing where they currently reside. Immigration and citizenship matters and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements are ineligible costs.

Credit Repair

Paying for credit counseling and other services necessary to assist program participants with critical financial skills are eligible, including skills related to:

- Household budgeting
- Managing money
- Accessing a free personal credit report
- Resolving personal credit problems

This assistance **DOES NOT** include the payment or modification of a debt.

Personal Protective Equipment (PPE)

In [CPD-21-08](#) HUD authorized ESG-CV funds to be used under [24 CFR 576.102\(a\)\(1\)](#) to purchase equipment used for protection from coronavirus by both Homelessness Prevention service providers and eligible clients, including:

- Face masks or shields
- Hand sanitizer
- Disposable gloves

Furniture and Household Furnishings

Buying furniture and household furnishings for use by program participants while they are receiving Homelessness Prevention assistance is eligible. These furnishings and furniture are subject to the requirements for equipment at [2 CFR 200.313](#). Upon the termination of Homelessness Prevention assistance, the program participant must return all furniture and household furnishings that were reimbursed with ESG-CV funding to the grantee. These furnishings and furniture may be reused by the grantee for multiple households, as long as those households are receiving Homelessness Prevention assistance.

Renters Insurance

Paying for renters insurance for program participants receiving Homelessness Prevention assistance is eligible. In order to pay for renters insurance for program participants, the grantee must:

1. Demonstrate that the payment of renters insurance is necessary to obtain or maintain housing (e.g., the landlord requires renters to have renters insurance to reside in the unit in the lease); and
2. Pay the renters insurance directly to the insurance company on behalf of the program participant

Childcare, Education, Employment, and Life Skills Services⁵⁵

Staffing for the provision of childcare services such as providing meals, snacks, and appropriate developmental activities are eligible. The children must be under the age of 13, unless they are disabled. Disabled children must be under the age of 18. The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.

Providing program participants with basic knowledge and skills so they can obtain and maintain housing is eligible. This education should be focused on instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, or General Educational Development (GED). These services or activities include:

- Screening, assessment and testing
- Individual or group instruction
- Tutoring
- Books and instructional material
- Counseling
- Referral to community resources

Providing employment assistance and job training for program participants is eligible. This can be through classroom, online, computer instruction, and/or on-the-job training. This employment assistance and job training should assist individuals in securing employment, acquiring learning skills,

⁵⁵ Originally eligible only under Essential Services for Standard and Temporary Emergency Shelter, [CPD-21-08](#) has made all Essential Services under [24 CFR 576.102\(a\)\(1\)](#) also eligible under the Housing Relocation and Stabilization Services subcomponent of the Homelessness Prevention component for ESG-CV.

and/or increasing earning potential. These services or activities include:

- Acquisition of vocational licenses and/or certificates
- Employment screening, assessment, and testing
- Special training and tutoring, including literacy training and prevocational training
- Books and instructional material
- Counseling or job coaching
- Referral to community resources

Teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance use, and being at-risk of homelessness is eligible. These must be skills that are necessary to assist the program participant to function independently in the community, including:

- Budgeting resources
- Managing money
- Managing a household
- Resolving conflict
- Shopping for food and needed items
- Improving nutrition
- Using public transportation
- Parenting

Health, Mental Health, and Substance Abuse Services⁵⁶

Direct outpatient treatment of medical conditions provided by licensed medical professionals (to the extent that other appropriate health services are unavailable within the community) are eligible, including:

- Assessing a program participant's health problems and developing a treatment plan
- Assisting program participants to understand their health needs
- Providing directly or assisting program participants to obtain emergency medical services
- Medication and follow-up services
- Preventive and non-cosmetic dental care

Direct outpatient treatment of mental health conditions provided by licensed medical professionals (to the extent that other appropriate health services are unavailable within the community) are eligible, including:

- Application of therapeutic processes to personal, family, situational, or occupational problems

⁵⁶ Originally eligible only under Essential Services for Standard and Temporary Emergency Shelter, [CPD-21-08](#) has made all Essential Services under [24 CFR 576.102\(a\)\(1\)](#) also eligible under the Housing Relocation and Stabilization Services subcomponent of the Homelessness Prevention component for ESG-CV.

- Crisis interventions
- Individual, family, or group therapy sessions
- Prescription of psychotropic medications
- Explanations about the use and management of medications

Substance abuse treatment services designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors that are provided by licensed or certified professionals (to the extent that other appropriate health services are unavailable within the community) are eligible, including:

- Client intake and assessment
- Outpatient treatment for up to 30 days
- Group and individual counseling and drug testing
- Inpatient detoxification and other inpatient drug or alcohol treatment **ARE NOT** eligible costs.

Transportation⁵⁷

Transportation costs of a program participant's travel to and from medical care, employment, child care, or other eligible essential services facilities are eligible,⁵⁸ including:

- Public transportation for program participants to and from permanent housing and service facilities
- Travel costs for service workers to accompany or assist program participants to use public transportation to and from permanent housing and service facilities⁵⁹
- Travel costs for service workers to visit program participants using their own vehicle⁶⁰
- Costs associated with purchasing or leasing a vehicle **ARE NOT** eligible

Services for Special Populations⁶¹

Any of the essential services listed above that have been tailored to address the special needs of youth, victims of domestic violence and related crimes/threats, and/or people living with HIV/AIDS who are at-risk of homelessness.

⁵⁷ Originally eligible only under Essential Services for Standard and Temporary Emergency Shelter, [CPD-21-08](#) has made all Essential Services under [24 CFR 576.102\(a\)\(1\)](#) also eligible under the Housing Relocation and Stabilization Services subcomponent of the Homelessness Prevention component for ESG-CV.

⁵⁸ Transportation for coronavirus testing and vaccination is eligible under Homelessness Prevention, but is billed under a separate subcomponent then other Homelessness Prevention transportation costs.

⁵⁹ This can be reimbursed using the Federal mileage rate.

⁶⁰ This can be reimbursed using the Federal mileage rate.

⁶¹ Originally eligible only under Essential Services for Standard and Temporary Emergency Shelter, [CPD-21-08](#) has made all Essential Services under [24 CFR 576.102\(a\)\(1\)](#) also eligible under the Housing Relocation and Stabilization Services subcomponent of the Homelessness Prevention component for ESG-CV.

Eligible Activities – Financial Assistance

Direct financial payments to housing owners, utility companies, and other third parties for a tenant are eligible, including:

Moving Costs

Paying for moving costs, such as truck rental or hiring a moving company are eligible. This assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving Housing Relocation and Stabilization Services under Homelessness Prevention and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears **IS NOT** eligible

Rent Application Fees

Paying for the rental housing application fee that is charged by the owner to all applicants is eligible. If the household has multiple members who are required to pay a fee, each rental application fee charged to the household can be reimbursed.

Last Month's Rent

If necessary to obtain housing for a program participant, paying the last month's rent to the owner of that housing at the time the owner is paid the security deposit and the first month's rent is eligible. This assistance must not exceed one month's rent.

Security and Utility Deposits

Paying for a standard security deposit required by the landlord for all customers is eligible. Paying for a standard utility deposit required by the utility company for all customers for the following utilities is also eligible:

- Gas
- Electric
- Water
- Sewage

Utility Payments

Paying for up to 24 months of utility payments per program participant, per service is eligible. A partial payment of a utility bill counts as one month. This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments. Eligible utility services include:

- Gas
- Electric
- Water
- Sewage

Utility Arrears

Paying up to six months of arrears, including late fees on the arrears, of utility payments per program

participant, per service is eligible. This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments. Eligible utility services include:

- Gas
- Electric
- Water
- Sewage

Eligible Activities - Rental Assistance

Direct rental payments to housing owners, landlords, and other third parties for a tenant are eligible. Rental assistance may not be provided to a program participant who has been provided with replacement housing payments under the URA during the period of time covered by the URA payments. Eligible costs include:

Short-Term Rental Assistance

Providing up to three months of rental assistance. Short-term rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance, or living in a housing unit receiving project-based rental assistance or operating assistance, through other public sources.

Medium-Term Rental Assistance

Providing between three to 24 months of rental assistance. Medium-term rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance, or living in a housing unit receiving project-based rental assistance or operating assistance, through other public sources.

Rental Arrears

One-time payment of up to six months rental arrears, including late fees on the arrears.

Eligible Activities – Disease Mitigation Training

Training specifically on infectious disease prevention and mitigation for ESG-CV funded staff working directly to prevent, prepare for, and respond to coronavirus among persons who are at risk of homelessness with Homelessness Prevention activities.

Eligible Activities – Hazard Pay

Hazard pay for staff working directly to prevent, prepare for, and respond to coronavirus among persons who are at-risk of homelessness with Homelessness Prevention activities. This includes any staff who are putting themselves in proximity to persons with coronavirus or working in locations with a high likelihood of contracting coronavirus for Homelessness Prevention activities. Hazard pay should only be provided to staff for the hours in which they putting themselves at risk while providing Homelessness Prevention services. This time should be tracked separately on timesheets from time spent providing these same services without putting themselves at risk. The maximum amount that can be provided to staff for Hazard Pay is 50 percent (50%) of their hourly wage (or equivalent) in addition to their regular wage. The

regular wage should be billed under Housing Relocation and Stabilization Services, while the bonus of up to 50 percent (50%) of their hourly wage (or equivalent) should be charged under Hazard Pay.

Eligible Activities – Volunteer Incentives

Providing reasonable incentives for volunteers who are currently helping to provide necessary Homelessness Prevention during the coronavirus outbreak. Incentives can be provided for volunteering done in the past by an individual (within the grant period), but only if they are continuing to volunteer after the payment of the incentive. Timesheets or sign-in sheets should be kept to track the volunteer's involvement. Eligible incentives include:

- Cash
- Gift cards
- Meals immediately before, during, or immediately after the time spent volunteering
- Other⁶²

Eligible Activities – Landlord Incentives

Providing reasonable and necessary incentives for landlords to obtain housing for individuals and families at risk of homelessness is eligible. However, a recipient may not use ESG-CV funds to pay the landlord incentives in an amount that exceeds three times the rent charged for the unit. These incentives must be agreed upon between the grantee and the landlord prior to the program participant being housed and included in the rental assistance agreement to be eligible under ESG-CV. These incentives include:

- Signing bonuses equal to up to two months of rent
- Security deposits equal to up to three months of rent⁶³
- Repair costs for damages incurred by the program participant not covered by the security deposit or that are incurred while the program participant is still residing in the unit
- Cleaning and maintenance costs for the unit or appliances

Eligible Activities – Vaccine Incentives

Making direct, cash payments of up to \$50.00 per dose to Homelessness Prevention eligible clients as an incentive for receiving a coronavirus vaccine, for a max of \$100.00 in total cash payments per client. For single-dose vaccines, the client can receive one cash payment of \$50.00. For two-dose vaccines, the client can receive two separate cash payments of \$50.00 each.⁶⁴ Clients must present an official COVID-19 Record Card as proof that they received the dose. ESG-CV funds may only be used for vaccine

⁶² Other forms of incentives may be use if approved beforehand by the ESG-CV Grant Specialist.

⁶³ These are separate from the costs of security deposits under the Financial Assistance subcomponent of Homelessness Prevention.

⁶⁴ These cash payments can only be made to clients after they receive the dose. Clients who are scheduled to receive a dose may not be paid in advance for that dose.

incentives to the extent that other vaccine incentives are inaccessible or unavailable to people at-risk of homelessness within the community. Grantees must certify that the client has not received any other vaccine incentive for each dose that the client is receiving a cash payment for using the CV-218 Vaccine Incentive Documentation form. Clients receiving no ESG-CV services other than Vaccine Incentives, Vaccine and Testing Transportation, or both do not need to fill out the CV-104 to certify their at-risk of homelessness status. These clients can certify their at-risk of homelessness status using the CV-218 instead.

Eligible Activities - Vaccine and Testing Transportation

Transportation costs specifically for the transportation of Homeless Prevention eligible clients to and from coronavirus testing and vaccination sites is eligible as a separate subcomponent under Homeless Prevention, including:

- Costs of transporting individuals and families using vehicles owned by the grantee to and from coronavirus testing and vaccination sites⁶⁵
- Cost of public transportation for individuals and families to and from coronavirus testing and vaccination sites
- Cost for staff to accompany or assist participants to use public transportation to and from coronavirus testing and vaccination sites
- Costs associated with purchasing or leasing a vehicle **ARE NOT** eligible

Clients receiving no ESG-CV services other than Vaccine Incentives, Vaccine and Testing Transportation, or both do not need to fill out the CV-104 to certify their at-risk of homelessness status. These clients can certify their at-risk of homelessness status using the CV-218 instead.

Forms of Rental Assistance

Rental Assistance can come in one-of-three forms:

Tenant-Based Rental Assistance

A program participant may select a housing unit in which to live and may move to another unit or building and continue to receive rental assistance, as long as the program participant continues to meet the program requirements. The recipient may require that all program participants live within a particular area for the period in which the rental assistance is provided. There must be a lease between the owner and the program participant. Prior to assistance, the grantee and the owner must have a rental assistance agreement. The rental assistance agreement must terminate and no further rental assistance payments under that agreement may be made if:

1. The program participant moves out of the housing unit for which the program participant has a

⁶⁵ This can be reimbursed using the Federal mileage rate.

lease; or

2. The lease terminates and is not renewed; or
3. The program participant becomes ineligible to receive ESG-CV rental assistance under Homelessness Prevention.

Project-Based Rental Assistance

The grantee may enter into a rental assistance agreement with the owner of an ESG-CV eligible permanent housing unit to reserve the unit and subsidize its rent prior to a program participant moving into the unit. The rental assistance agreement may cover one or more permanent housing units in the same building. Each unit covered by the rental assistance agreement may only be occupied by ESG-CV eligible program participants. The following rules apply to all project-based rental assistance:

- The grantee may pay up to 100 percent (100%) of the first month's rent, provided that a program participant signs a lease with the owner and moves into the unit before the end of the month for which the first month's rent is paid.
- The rent paid before a program participant moves into the unit must not exceed the rent to be charged under the program participant's lease and must be included when determining that program participant's total rental assistance.
- The grantee may make monthly rental assistance payments only for each whole or partial month an assisted unit is leased to a program participant, except that if a program participant moves out of an assisted unit before expiration of the agreement.
- The grantee may use ESG-CV funds to cover up to 100 percent (100%) of the rent for the unit for up to 30 days from the end of the month in which the unit was vacated while the grantee attempts to house another eligible program participant in that unit.
- The previously listed payment will not count toward the total rental assistance provided to the next program participant housed in the unit, unless the program participant moves in during the first half of the month that is paid using this flexibility.
- This payment will not prevent paying up to 100 percent (100%) of the first month's rent for the new program participant as long as the payments are made for different months.

The program participant's lease must not condition the term of occupancy to the provision of rental assistance payments. If the program participant is determined ineligible or reaches the maximum number of months over which rental assistance can be provided, the grantee must suspend or terminate the rental assistance payments for the unit. If the payments are suspended, the individual or family may remain in the assisted unit as permitted under the lease, and the grantee may resume payments if the individual or family again becomes eligible and needs further rental assistance. If the payments are terminated, the rental assistance may be transferred to another available unit in the same building, provided that the other unit meets all ESG-CV requirements.

The rental assistance agreement between the grantee and the owner must have an initial term of no less than one year. When a new program participant moves into an assisted unit, the term of the rental assistance agreement may be extended to cover the initial term of the program participant's lease. If the program participant's lease is renewed, the rental assistance agreement may be renewed or extended, as needed, up to the maximum number of months for which the program participant remains eligible.

Sponsor-Based Rental Assistance

The grantee must execute a sponsor-based rental assistance agreement with a separate government agency, instrumentality, or nonprofit organization ("sponsor") to subsidize the rent of program participants who are referred to be housed in units owned or leased by the sponsor. The rental assistance agreement may cover one or more permanent housing units owned or leased by the sponsor. Each unit covered by the rental assistance agreement may only be occupied by program participants. The following rules apply to all sponsor-based rental assistance:

- The grantee may pay up to 100 percent (100%) of the rent for the first month that the sponsored unit becomes available for rent to a new program participant, provided that a program participant signs a lease or sublease and moves into the unit before the end of the month for which that first month's rent is paid.
- The rent paid before a program participant moves into the unit must not exceed the rent to be charged under the new program participant's lease or sublease, and unless the program participant moves in during the last half of the month that is paid, this payment must be included when determining that program participant's total rental assistance.
- The previously listed payment be at the beginning of the agreement or after the payment permitted in the following paragraph, as long as payments are made for different months.
- The grantee may make monthly rental assistance payments only for each whole or partial month a sponsored unit is leased or subleased to a program participant, except that if a program participant moves out of a sponsored unit before expiration of the rental assistance agreement.
- The grantee may use ESG-CV funds to cover up to 100 percent (100%) of the rent for the unit for up to 30 days from the end of the month in which the unit was vacated while the grantee work together with the sponsor to house another eligible program participant in that unit.
- The previously listed payment will not count toward the total rental assistance provided to the next program participant housed in the unit, unless the program participant moves in during the first half of the month that is paid using this flexibility.
- The grantee may require that the program participant rent a unit owned by the sponsor to benefit from sponsor-based rental assistance. However, in no case may a grantee execute a sponsor-based rental assistance agreement with itself or its parent or subsidiary organization.

In all other respects, sponsor-based rental assistance must be administered in accordance with the same

requirements that apply to tenant-based and project-based rental assistance under [24 CFR 576](#), the waivers and alternative requirements in [CPD-21-08](#), and the ESG-CV Desk Guide; except that:

- The references to “owner” and “housing owner” will be understood to refer to the “sponsor,” when those terms appear in when those terms appear in the [24 CFR 576.105](#), [24 CFR 576.106](#), [24 CFR 576.409](#), and [24 CFR 576.500\(h\)](#);
- The references to “lease” will be understood to refer to the lease or sublease (as applicable) between the program participant and the sponsor for the “sponsored unit” in which the program participant will reside when those terms appear in [24 CFR 576.105](#), [24 CFR 576.106](#), [24 CFR 576.409](#), and [24 CFR 576.500\(h\)](#); and
- The references to “project-based rental assistance” will be understood to refer to “sponsor-based rental assistance” when that term appears in [24 CFR 576.409](#).

Leases, Subleases, and Rental Assistance Agreements

Within this ESG-CV Desk Guide, [CPD-21-08](#), and [24 CFR 576](#) “lease” refers to a legally binding, written lease for the rental unit. This must be between the owner and the program participant. Where the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease, if the agreement gives the program participant an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented by the owner's financial records, rent ledgers, or canceled checks. For program participants living in housing with project-based rental assistance, the lease must have an initial term of no less than one year. Each lease executed on or after December 16, 2016 must include a lease 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 under [24 CFR 5.2005\(b\) and \(c\)](#). If the housing is not assisted under another “covered housing program” as defined in [24 CFR 5.2003](#), then the lease provision or lease addendum may be written to expire at the end of the rental assistance period.

In [CPD-21-08](#) HUD authorized ESG-CV funds to be used under [24 CFR 576.105](#) and [24 CFR 576.106](#) for program participants who are subleasing. Within this ESG-CV Desk Guide, [CPD-21-08](#), and [24 CFR 576](#), “sublease” refers to a legally valid sublease with the primary leaseholder for the rental unit. When a program participant chooses to sublease a unit:

- The references to “owner” and “housing owner” will be understood to refer to the “primary leaseholder” when those terms appear in the ESG-CV Desk Guide, [CPD-21-08](#), [24 CFR 576.105](#), [24 CFR 576.106](#), [24 CFR 576.409](#), and [24 CFR 576.500\(h\)](#); and
- The references to “lease” will be understood to refer to the sublease, when that term appears in the ESG-CV Desk Guide, [CPD-21-08](#), [24 CFR 576.105](#), [24 CFR 576.106](#), [24 CFR 576.409](#), and [24 CFR 576.500\(h\)](#).

Within this ESG-CV Desk Guide, [CPD-21-08](#), and [24 CFR 576](#) “rental assistance agreement” refers to a documented agreement between the grantee providing rental assistance and the owner of the unit. This agreement establishes the terms under which rental assistance will be provided. It also requires the owner to provide a copy of any notice provided to program participants to vacate the housing unit or any complaint used under State or local law to evict the program participant to the agency providing ESG-CV rental assistance.⁶⁶ This is not a legally-binding agreement and is not the same as a lease or sublease.

Housing Stability Case Management

While providing Homelessness Prevention, the case manager must develop a plan to assist the program participant to retain permanent housing after the ESG-CV assistance ends, taking into account all relevant considerations such as the participant’s current or expected income and expenses; other public or private assistance for which the participant will be eligible and likely to receive; and the relative affordability of available housing in the area. Assistance cannot exceed 60 days during the period the program participant is seeking permanent housing.

Using Rental Assistance with Other Subsidies

Rental assistance cannot be provided to program participants receiving tenant-based rental assistance or living in a housing unit receiving project-based rental assistance or operating assistance through other public sources for the same time period. Rental arrears can be provided to households receiving rental subsidies.

Rent Restrictions

Rental units must comply with rent reasonableness ([24 CFR 982.507](#)). Rent for unit assisted with ESG-CV must not exceed the rent reasonableness standard. Rent must be reasonable when compared to other units of similar location, type, size, and amenities within the community. Requirements do not apply for households not receiving ESG-CV rental assistance. Compliance with this requirement can be documented using the CV-206 Rent Reasonableness form.

Lead-Based Paint and Minimum Habitability Standards

All housing occupied by ESG-CV program participants must be inspected for lead-based paint in accordance with [24 CFR 35](#). ESG-CV funds must be used to help participants obtain or maintain housing that meets either the minimum habitability standards from [24 CFR 576.403](#) or the Housing Quality Standards (HQS) under [24 CFR 982.401](#).⁶⁷

⁶⁶ MHDC has a “Sample Rental Assistance Agreement” located [here](#).

⁶⁷ When certifying HQS, [24 CFR 982.401\(j\)](#) need only be applied to housing occupied by program participants receiving tenant-based rental assistance.

Records to Maintain - Program Participants

Record	Criteria
Homelessness Status and Eligibility Certification	<ul style="list-style-type: none"> Form CV-104⁶⁸
Income Worksheet, as applicable	<ul style="list-style-type: none"> Form CV-201
Supporting Documentation of Sources of Income	<ul style="list-style-type: none"> Third-party verification of proof of gross annual income is needed for all members of the household age 18 and over Minimum of two pay stubs reflecting frequency of pay and current within 30 days Pay stubs, SSI/SSDI award letter/printout, child support statement, EBT statement for TANF If income source documents are unobtainable, CI-112 Income Verification form may be completed. Agencies must document their efforts to obtain income source documents first
Photo Identification	<ul style="list-style-type: none"> Needed for all members of the household age 18 and over Driver's license, State ID, temporary ID/license, school ID with photo, passport-U.S. or foreign, U.S. passport card, permanent resident card, etc. If proof of ID is unavailable upon entry, agencies must adequately document efforts to obtain these and follow up in case management notes when ID has been received
Initial Consultation Documentation	<ul style="list-style-type: none"> Agency Intake Documentation
Case Management Documentation	<ul style="list-style-type: none"> Assessing, arranging, coordinating, and monitoring delivery of services to facilitate housing stability Notes must be dated and detail housing goals, plans, referrals
Proof of Need	<ul style="list-style-type: none"> Documentation provided by participant to determine amounts/types of assistance needed for the household to gain stability in permanent housing Utility bills, lease, arrears, and/or eviction documentation
Proof of Payment for ESG-CV reimbursement	<ul style="list-style-type: none"> Canceled check or bank statement showing payments cleared highlighted and/or returned checks log
Rental Assistance Agreement	<ul style="list-style-type: none"> Agreement between the landlord and ESG-CV grantee Applicable only to households receiving ongoing rental assistance (N/A for arrears)
Lease or Sublease	<ul style="list-style-type: none"> Lease between program participant and landlord or sublease between the program participant and the lease holder Households assisted with ongoing rental assistance must have a written lease or sublease for the rental unit
Habitability Inspection	<ul style="list-style-type: none"> Form ESG-205 (PH version) or HQS certification
Lead-based Paint Inspection	<ul style="list-style-type: none"> Form ESG-207, ESG-208
Rent Reasonableness Certification	<ul style="list-style-type: none"> Form CV-206

⁶⁸ Not necessary for clients who are receiving no ESG-CV services other than Vaccine Incentives, Vaccine and Testing Transportation, or both. These clients can certify their homelessness status using the CV-218.

Consent Form	<ul style="list-style-type: none"> Form CI-108 or CI-108-DV
Social Security Identification	<ul style="list-style-type: none"> Card/number needed for all members of the household Social Security Card, printout from social security office If proof of ID is unavailable upon entry, agencies must adequately document efforts to obtain these and follow up in case management notes when ID has been received
Vaccine Incentive Documentation	<ul style="list-style-type: none"> Form CV-218 (only necessary for clients who receive Vaccine Incentives)

Homelessness Prevention Financial Process

After incurring Homelessness Prevention expenses, grantees may submit for payment using MHDC's [grant interface](#). Using the following forms,⁶⁹ agencies are expected to completely fill out the online form, and then attach a pdf that includes the following documents:

- CV-212 (Completely fill out the Homelessness Prevention expense detail tab)
 - If you do not have any indirect expenses (such as caseworker salaries) it is not necessary to fill out or attach this form.
 - Do **NOT** outline direct services on the expense detail form.
- Homeless Prevention HMIS Report (list that outlines the client ID, service type, service date, vendor paid, and amount paid.)

Common reasons that Homelessness Prevention payment requests are discarded:

- Housing services or direct assistance expenses are incurred outside of the eligible funding period.
- Amount requested is greater than the amount remaining in the grant balance.
- Expenses included on the Homelessness Prevention Expense Detail are not listed as eligible in the ESG-CV Desk Guide or HUD's Consolidated Federal Regulations (CFR).
- HMIS report does not provide client-specific data.

Program Guidelines

Standards for what should be included in Homelessness Prevention program guidelines can be found at <https://www.endhomelessnessmo.org/gceh-policies> and on MHDC's [website](#). Per [24 CFR 576 Subpart E](#), every ESG-CV grantee must develop and implement program guidelines that include:

- Procedure for determining and prioritizing which eligible individuals and families will receive Homeless Prevention and which eligible individuals and families will receive Rapid Rehousing assistance.
- Procedure for determining what percentage or amount of rent and utilities cost each program

⁶⁹ The CV-212 can be accessed [here](#)

participant must pay while receiving Homelessness Prevention assistance.

- Procedure for determining how long a program participant will be provided rental assistance and whether and how the amount of that assistance will be adjusted over time.
- Procedure for determining the type, amount, and duration of housing stabilization and/or relocation services to provide, including the limits, if any, on the Homelessness Prevention assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months in the program, or the maximum number of times the program participant may receive assistance.
- Policy for addressing the needs of ineligible applicants.

Rapid Rehousing

To move literally homeless individuals and families ([24 CFR 576.104](#)) quickly into permanent housing and achieve stability in that housing.

Eligibility

Participants must meet Category 1 or 4 of the homeless definition which must be determined upon initial evaluation. Upon annual re-evaluation, the individual or family must have an annual income that is at or below 50 percent (50%) of the area median income (AMI), as determined by HUD.

Literally Homeless (Category 1)	Individual or family who lacks a fixed, regular, and adequate nighttime residence: <ul style="list-style-type: none"> • Has a primary nighttime residence that is a public or private place not meant for human habitation; • Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, hotels/motels paid for by charitable organizations or federal, state, and local government programs; or • Is exiting an institution where he/she has resided for 120 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.
Fleeing/Attempting to Flee Domestic Violence (Category 4)	Individual or family who: <ul style="list-style-type: none"> • Is fleeing/attempting to flee domestic violence; • Has no other residence; and • Lacks resources or support networks needed to obtain other permanent housing.

Eligible Activities – Housing Relocation and Stabilization Services

Costs associated with providing services to individuals and families, including:

Housing Search and Placement Services

Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing are eligible, including:

- Assessment of housing barriers, needs, and preferences
- Development of an action plan for locating housing
- Housing search
- Outreach to and negotiation with owners
- Assistance with submitting rental applications and understanding leases
- Assessment of housing for compliance with ESG-CV requirements for habitability, lead-based paint, and rent reasonableness
- Assistance with obtaining utilities and making moving arrangements
- Tenant counseling

Housing Stability Case Management

Assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing are eligible. This assistance cannot exceed 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. Component services and activities consist of:

- Using the centralized or coordinated assessment system as required under [24 CFR 576.400\(d\)](#) to evaluate individuals and families applying for or receiving Rapid Rehousing
- Conducting the initial evaluation required under [24 CFR 576.401\(a\)](#), including verifying and documenting eligibility, for individuals and families applying for Rapid Rehousing
- Counseling
- Developing, securing, and coordinating services and obtaining Federal, State, and local benefits
- Monitoring and evaluating program participant progress
- Providing information and referrals to other providers
- Developing an individualized housing and service plan, including planning a path to permanent housing stability
- Conducting re-evaluations required under [24 CFR 576.401\(b\)](#)
- Using the centralized or coordinated assessment system as required under [24 CFR 576.400\(d\)](#)
- Conducting the initial evaluation required under [24 CFR 576.401\(a\)](#), including verifying and documenting eligibility
- Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking
- Developing an individualized housing and service plan, including planning a path to permanent housing stability.

Mediation

Paying for mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the program participant from losing permanent housing in which the program participant currently resides, is eligible.

Legal Services

Legal services are limited to those services necessary to help program participants obtain housing or keep a program participant from losing housing where they currently reside. Immigration and citizenship

matters and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements are ineligible costs.

Credit Repair

Paying for credit counseling and other services necessary to assist program participants with critical financial skills are eligible, including skills related to:

- Household budgeting
- Managing money
- Accessing a free personal credit report
- Resolving personal credit problems

This assistance **DOES NOT** include the payment or modification of a debt.

Personal Protective Equipment (PPE)

In [CPD-21-08](#) HUD authorized ESG-CV funds to be used under [24 CFR 576.102\(a\)\(1\)](#) to purchase equipment used for protection from coronavirus by both Rapid Rehousing service providers and eligible clients, including:

- Face masks or shields
- Hand sanitizer
- Disposable gloves

Furniture and Household Furnishings

Buying furniture and household furnishings for use by program participants while they are receiving Rapid Rehousing assistance is eligible. These furnishings and furniture are subject to the requirements for equipment at [2 CFR 200.313](#). Upon the termination of Rapid Rehousing assistance, the program participant must return all furniture and household furnishings that were reimbursed with ESG-CV funding to the grantee. These furnishings and furniture may be reused by the grantee for multiple households, as long as those households are receiving Rapid Rehousing assistance.

Renters Insurance

Paying for renters insurance for program participants receiving Rapid Rehousing assistance is eligible. In order to pay for renters insurance for program participants, the grantee must:

1. Demonstrate that the payment of renters insurance is necessary to obtain or maintain housing (e.g., the landlord requires renters to have renters insurance to reside in the unit); and
2. Pay the renters insurance directly to the insurance company on behalf of the program participant.

Childcare, Education, Employment, and Life Skills Services⁷⁰

Staffing for the provision of childcare services such as providing meals, snacks, and appropriate developmental activities are eligible. The children must be under the age of 13, unless they are disabled. Disabled children must be under the age of 18. The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.

Providing program participants with basic knowledge and skills so they can obtain and maintain housing is eligible. This education should be focused on instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, or General Educational Development (GED). These services or activities include:

- Screening, assessment and testing
- Individual or group instruction
- Tutoring
- Books and instructional material
- Counseling
- Referral to community resources

Providing employment assistance and job training for program participants is eligible. This can be through classroom, online, computer instruction, and/or on-the-job training. This employment assistance and job training should assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. These services or activities include:

- Acquisition of vocational licenses and/or certificates
- Employment screening, assessment, and testing
- Special training and tutoring, including literacy training and prevocational training
- Books and instructional material
- Counseling or job coaching
- Referral to community resources.

Teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance use, and being homeless is eligible. These must be skills that are necessary to assist the program participant to function independently in the community, including:

- Budgeting resources
- Managing money
- Managing a household
- Resolving conflict
- Shopping for food and needed items
- Improving nutrition

⁷⁰ Originally eligible only under Essential Services for Standard and Temporary Emergency Shelter, [CPD-21-08](#) has made all Essential Services under [24 CFR 576.102\(a\)\(1\)](#) also eligible under the Housing Relocation and Stabilization Services subcomponent of the Rapid Rehousing component for ESG-CV.

- Using public transportation
- Parenting

Health, Mental Health, and Substance Abuse Services⁷¹

Direct outpatient treatment of medical conditions provided by licensed medical professionals (to the extent that other appropriate health services are unavailable within the community) are eligible, including:

- Assessing a program participant's health problems and developing a treatment plan
- Assisting program participants to understand their health needs
- Providing directly or assisting program participants to obtain emergency medical services
- Medication and follow-up services
- Preventive and non-cosmetic dental care

Direct outpatient treatment of mental health conditions provided by licensed medical professionals (to the extent that other appropriate health services are unavailable within the community) are eligible, including:

- Application of therapeutic processes to personal, family, situational, or occupational problems
- Crisis interventions
- Individual, family, or group therapy sessions
- Prescription of psychotropic medications
- Explanations about the use and management of medications

Substance abuse treatment services designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors that are provided by licensed or certified professionals (to the extent that other appropriate health services are unavailable within the community) are eligible, including:

- Client intake and assessment
- Outpatient treatment for up to 30 days
- Group and individual counseling and drug testing
- Inpatient detoxification and other inpatient drug or alcohol treatment **ARE NOT** eligible costs.

⁷¹ Originally eligible only under Essential Services for Standard and Temporary Emergency Shelter, [CPD-21-08](#) has made all Essential Services under [24 CFR 576.102\(a\)\(1\)](#) also eligible under the Housing Relocation and Stabilization Services subcomponent of the Rapid Rehousing component for ESG-CV.

Transportation⁷²

Transportation costs of a program participant's travel to and from medical care, employment, child care, or other eligible essential services facilities are eligible,⁷³ including:

- Public transportation for program participants to and from permanent housing and service facilities
- Travel costs for service workers to accompany or assist program participants to use public transportation to and from permanent housing and service facilities⁷⁴
- Travel costs for service workers to visit program participants using their own vehicle⁷⁵
- Costs associated with purchasing or leasing a vehicle **ARE NOT** eligible

Services for Special Populations⁷⁶

Any of the essential services listed above that have been tailored to address the special needs of homeless youth, victims of domestic violence and related crimes/threats, and/or people living with HIV/AIDS who are homelessness.

Eligible Activities – Financial Assistance

Direct financial payments to housing owners, utility companies, and other third parties for a tenant are eligible, including:

Moving Costs

Paying for moving costs, such as truck rental or hiring a moving company are eligible. This assistance may include payment of temporary storage fees for up to three months, provided that the fees are accrued after the date the program participant begins receiving Housing Relocation and Stabilization Services under Rapid Rehousing and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.

Rent Application Fees

Paying for the rental housing application fee that is charged by the owner to all applicants is eligible. If the household has multiple members who are required to pay a fee, each rental application fee charged to the household can be reimbursed.

⁷² Originally eligible only under Essential Services for Standard and Temporary Emergency Shelter, [CPD-21-08](#) has made all Essential Services under [24 CFR 576.102\(a\)\(1\)](#) also eligible under the Housing Relocation and Stabilization Services subcomponent of the Rapid Rehousing component for ESG-CV.

⁷³ Transportation for coronavirus testing and vaccination is eligible under Rapid Rehousing, but is billed under a separate subcomponent than other Rapid Rehousing transportation costs.

⁷⁴ This can be reimbursed using the Federal mileage rate.

⁷⁵ This can be reimbursed using the Federal mileage rate

⁷⁶ Originally eligible only under Essential Services for Standard and Temporary Emergency Shelter, [CPD-21-08](#) has made all Essential Services under [24 CFR 576.102\(a\)\(1\)](#) also eligible under the Housing Relocation and Stabilization Services subcomponent of the Rapid Rehousing component for ESG-CV.

Last Month's Rent

If necessary to obtain housing for a program participant, paying the last month's rent to the owner of that housing at the time the owner is paid the security deposit and the first month's rent is eligible. This assistance must not exceed one month's rent.

Security and Utility Deposits

Paying for a standard security deposit required by the landlord for all customers is eligible. Paying for a standard utility deposit required by the utility company for all customers for the following utilities is also eligible:

- Gas
- Electric
- Water
- Sewage

Utility Payments

Paying for up to 24 months of utility payments per program participant, per service is eligible. A partial payment of a utility bill counts as one month. This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments. Eligible utility services include:

- Gas
- Electric
- Water
- Sewage

Utility Arrears

Paying up to six months of arrears, including late fees on the arrears, of utility payments per program participant, per service is eligible. This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments. Eligible utility services include:

- Gas
- Electric
- Water
- Sewage

Eligible Activities - Rental Assistance

Direct rental payments to housing owners, landlords, and other third parties for a tenant are eligible. Rental assistance may not be provided to a program participant who has been provided with replacement housing payments under the URA during the period of time covered by the URA payments. Eligible costs include:

Short-Term Rental Assistance

Providing up to three months of rental assistance. Short-term rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance, or living in a housing unit receiving

project-based rental assistance or operating assistance, through other public sources.

Medium-Term Rental Assistance

Providing between three to 24 months of rental assistance. Medium-term rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance, or living in a housing unit receiving project-based rental assistance or operating assistance, through other public sources.

Rental Arrears

One-time payment of up to six months rental arrears, including late fees on the arrears.

Eligible Activities – Disease Mitigation Training

Training specifically on infectious disease prevention and mitigation for ESG-CV funded staff working directly to prevent, prepare for, and respond to coronavirus among persons who are homeless with Rapid Rehousing activities.

Eligible Activities – Hazard Pay

Hazard pay for staff working directly to prevent, prepare for, and respond to coronavirus among persons who are homeless with Rapid Rehousing activities. This includes any staff who are putting themselves in proximity to persons with coronavirus or working in locations with a high likelihood of contracting coronavirus for Rapid Rehousing activities. Hazard pay should only be provided to staff for the hours in which they putting themselves at risk while providing Rapid Rehousing services. This time should be tracked separately on timesheets from time spent providing these same services without putting themselves at risk. The maximum amount that can be provided to staff for Hazard Pay is 50 percent (50%) of their hourly wage (or equivalent) in addition to their regular wage. The regular wage should be billed under Housing Relocation and Stabilization Services, while the bonus of up to 50 percent (50%) of their hourly wage (or equivalent) should be charged under Hazard Pay.

Eligible Activities – Volunteer Incentives

Providing reasonable incentives for volunteers who are currently helping to provide necessary Rapid Rehousing during the coronavirus outbreak. Incentives can be provided for volunteering done in the past by an individual (within the grant period), but only if they are continuing to volunteer after the payment of the incentive. Timesheets or sign-in sheets should be kept to track the volunteer's involvement. Eligible incentives include:

- Cash
- Gift cards
- Meals immediately before, during, or immediately after the time spent volunteering

- Other⁷⁷

Eligible Activities – Landlord Incentives

Providing reasonable and necessary incentives for landlords to obtain housing for homeless individuals and families is eligible. However, a recipient may not use ESG-CV funds to pay the landlord incentives in an amount that exceeds three times the rent charged for the unit. These incentives must be agreed upon between the grantee and the landlord prior to the program participant being housed and included in the rental assistance agreement to be eligible under ESG-CV. These incentives include:

- Signing bonuses equal to up to two months of rent
- Security deposits equal to up to three months of rent⁷⁸
- Repair costs for damages incurred by the program participant not covered by the security deposit or that are incurred while the program participant is still residing in the unit
- Cleaning and maintenance costs for the unit or appliances

Eligible Activities – Vaccine Incentives

Making direct, cash payments of up to \$50.00 per dose to Rapid Rehousing eligible clients as an incentive for receiving a coronavirus vaccine, for a max of \$100.00 in total cash payments per client. For single-dose vaccines, the client can receive one cash payment of \$50.00. For two-dose vaccines, the client can receive two separate cash payments of \$50.00 each.⁷⁹ Clients must present an official COVID-19 Record Card as proof that they received the dose. ESG-CV funds may only be used for vaccine incentives to the extent that other vaccine incentives are inaccessible or unavailable to people experiencing homelessness within the community. Grantees must certify that the client has not received any other vaccine incentive for each dose that the client is receiving a cash payment for using the CV-218 Vaccine Incentive Documentation form. Clients receiving no ESG-CV services other than Vaccine Incentives, Vaccine and Testing Transportation, or both do not need to fill out the CV-104 to certify their homelessness status. These clients can certify their homelessness status using the CV-218 instead.

Eligible Activities - Vaccine and Testing Transportation

Transportation costs specifically for the transportation of Rapid Rehousing eligible clients to and from coronavirus testing and vaccination sites is eligible as a separate subcomponent under Rapid Rehousing, including:

- Costs of transporting individuals and families using vehicles owned by the grantee to and from

⁷⁷ Other forms of incentives may be use if approved beforehand by the ESG-CV Grant Specialist.

⁷⁸ These are separate from the costs of security deposits under the Financial Assistance subcomponent of Rapid Rehousing.

⁷⁹ These cash payments can only be made to clients after they receive the dose. Clients who are scheduled to receive a dose may not be paid in advance for that dose.

coronavirus testing and vaccination sites⁸⁰

- Cost of public transportation for individuals and families to and from coronavirus testing and vaccination sites
- Cost for staff to accompany or assist participants to use public transportation to and from coronavirus testing and vaccination sites
- Costs associated with purchasing or leasing a vehicle **ARE NOT** eligible

Clients receiving no ESG-CV services other than Vaccine Incentives, Vaccine and Testing Transportation, or both do not need to fill out the CV-104 to certify their homelessness status. These clients can certify their homelessness status using the CV-218 instead.

Forms of Rental Assistance

Rental Assistance can come in one-of-three forms:

Tenant-Based Rental Assistance

A program participant may select a housing unit in which to live and may move to another unit or building and continue to receive rental assistance, as long as the program participant continues to meet the program requirements. The recipient may require that all program participants live within a particular area for the period in which the rental assistance is provided. There must be a lease between the owner and the program participant. Prior to assistance, the grantee and the owner must have a rental assistance agreement. The rental assistance agreement must terminate and no further rental assistance payments under that agreement may be made if:

1. The program participant moves out of the housing unit for which the program participant has a lease; or
2. The lease terminates and is not renewed; or
3. The program participant becomes ineligible to receive ESG-CV rental assistance under Rapid Rehousing

Project-Based Rental Assistance

The grantee may enter into a rental assistance agreement with the owner of an ESG-CV eligible permanent housing unit to reserve the unit and subsidize its rent prior to a program participant moving into the unit. The rental assistance agreement may cover one or more permanent housing units in the same building. Each unit covered by the rental assistance agreement may only be occupied by ESG-CV eligible program participants. The following rules apply to all project-based rental assistance:

- The grantee may pay up to 100 percent (100%) of the first month's rent, provided that a program participant signs a lease with the owner and moves into the unit before the end of the

⁸⁰ This can be reimbursed using the Federal mileage rate.

month for which the first month's rent is paid.

- The rent paid before a program participant moves into the unit must not exceed the rent to be charged under the program participant's lease and must be included when determining that program participant's total rental assistance.
- The grantee may make monthly rental assistance payments only for each whole or partial month an assisted unit is leased to a program participant, except that if a program participant moves out of an assisted unit before expiration of the agreement.
- The grantee may use ESG-CV funds to cover up to 100 percent (100%) of the rent for the unit for up to 30 days from the end of the month in which the unit was vacated while the grantee attempts to house another eligible program participant in that unit.
- The previously listed payment will not count toward the total rental assistance provided to the next program participant housed in the unit, unless the program participant moves in during the first half of the month that is paid using this flexibility.
- This payment will not prevent paying up to 100 percent (100%) of the first month's rent for the new program participant as long as the payments are made for different months.

The program participant's lease must not condition the term of occupancy to the provision of rental assistance payments. If the program participant is determined ineligible or reaches the maximum number of months over which rental assistance can be provided, then the grantee must suspend or terminate the rental assistance payments for the unit. If the payments are suspended, the individual or family may remain in the assisted unit as permitted under the lease, and the grantee may resume payments if the individual or family again becomes eligible and needs further rental assistance. If the payments are terminated, the rental assistance may be transferred to another available unit in the same building, provided that the other unit meets all ESG-CV requirements.

The rental assistance agreement between the grantee and the owner must have an initial term of no less than one year. When a new program participant moves into an assisted unit, the term of the rental assistance agreement may be extended to cover the initial term of the program participant's lease. If the program participant's lease is renewed, the rental assistance agreement may be renewed or extended, as needed, up to the maximum number of months for which the program participant remains eligible.

Sponsor-Based Rental Assistance

The grantee must execute a sponsor-based rental assistance agreement with a separate government agency, instrumentality, or nonprofit organization ("sponsor") to subsidize the rent of program participants who are referred to be housed in units owned or leased by the sponsor. The rental assistance agreement may cover one or more permanent housing units owned or leased by the sponsor. Each unit covered by the rental assistance agreement may only be occupied by program participants. The following rules apply to all sponsor-based rental assistance:

- The grantee may pay up to 100 percent (100%) of the rent for the first month that the sponsored unit becomes available for rent to a new program participant, provided that a program participant signs a lease or sublease and moves into the unit before the end of the month for which that first month's rent is paid.
- The rent paid before a program participant moves into the unit must not exceed the rent to be charged under the new program participant's lease or sublease, and unless the program participant moves in during the last half of the month that is paid, this payment must be included when determining that program participant's total rental assistance.
- The previously listed payment be at the beginning of the agreement or after the payment permitted in the following paragraph, as long as payments are made for different months.
- The grantee may make monthly rental assistance payments only for each whole or partial month a sponsored unit is leased or subleased to a program participant, except that if a program participant moves out of a sponsored unit before expiration of the rental assistance agreement.
- The grantee may use ESG-CV funds to cover up to 100 percent (100%) of the rent for the unit for up to 30 days from the end of the month in which the unit was vacated while the grantee work together with the sponsor to house another eligible program participant in that unit.
- The previously listed payment will not count toward the total rental assistance provided to the next program participant housed in the unit, unless the program participant moves in during the first half of the month that is paid using this flexibility.
- The grantee may require that the program participant rent a unit owned by the sponsor to benefit from sponsor-based rental assistance. However, in no case may a grantee execute a sponsor-based rental assistance agreement with itself or its parent or subsidiary organization.

In all other respects, sponsor-based rental assistance must be administered in accordance with the same requirements that apply to tenant-based and project-based rental assistance under [24 CFR 576](#), the waivers and alternative requirements in [CPD-21-08](#), and the ESG-CV Desk Guide; except that:

- The references to “owner” and “housing owner” will be understood to refer to the “sponsor” when those terms appear in when those terms appear in the [24 CFR 576.105](#), [24 CFR 576.106](#), [24 CFR 576.409](#), and [24 CFR 576.500\(h\)](#);
- The references to “lease” will be understood to refer to the lease or sublease (as applicable) between the program participant and the sponsor for the “sponsored unit” in which the program participant will reside when those terms appear in [24 CFR 576.105](#), [24 CFR 576.106](#), [24 CFR 576.409](#), and [24 CFR 576.500\(h\)](#); and
- The references to “project-based rental assistance” will be understood to refer to “sponsor-based rental assistance” when that term appears in [24 CFR 576.409](#).

Leases, Subleases, and Rental Assistance Agreements

Within this ESG-CV Desk Guide, [CPD-21-08](#), and [24 CFR 576](#) “lease” refers to a legally binding, written lease for the rental unit. This must be between the owner and the program participant. Where the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease, if the agreement gives the program participant an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented by the owner's financial records, rent ledgers, or canceled checks. For program participants living in housing with project-based rental assistance, the lease must have an initial term of no less than one year. Each lease executed on or after December 16, 2016 must include a lease 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 under [24 CFR 5.2005\(b\) and \(c\)](#). If the housing is not assisted under another “covered housing program” as defined in [24 CFR 5.2003](#), the lease provision or lease addendum may be written to expire at the end of the rental assistance period.

In [CPD-21-08](#) HUD authorized ESG-CV funds to be used under [24 CFR 576.105](#) and [24 CFR 576.106](#) for program participants who are subleasing. Within this ESG-CV Desk Guide, [CPD-21-08](#), and [24 CFR 576](#), “sublease” refers to a legally valid sublease with the primary leaseholder for the rental unit. When a program participant chooses to sublease a unit:

- The references to “owner” and “housing owner” will be understood to refer to the “primary leaseholder” when those terms appear in the ESG-CV Desk Guide, [CPD-21-08](#), [24 CFR 576.105](#), [24 CFR 576.106](#), [24 CFR 576.409](#), and [24 CFR 576.500\(h\)](#); and
- The references to “lease” will be understood to refer to the sublease, when that term appears in the ESG-CV Desk Guide, [CPD-21-08](#), [24 CFR 576.105](#), [24 CFR 576.106](#), [24 CFR 576.409](#), and [24 CFR 576.500\(h\)](#).

Within this ESG-CV Desk Guide, [CPD-21-08](#), and [24 CFR 576](#), “rental assistance agreement” refers to a documented agreement between the grantee providing rental assistance and the owner of the unit. This agreement establishes the terms under which rental assistance will be provided, and it requires the owner to provide a copy of any notice provided to program participants to vacate the housing unit or any complaint used under State or local law to evict the program participant to the agency providing ESG-CV rental assistance.⁸¹ This is not a legally-binding agreement and is not the same as a lease or sublease.

Housing Stability Case Management

While providing Rapid Rehousing, the case manager must develop a plan to assist the program participant to retain permanent housing after the ESG-CV assistance ends, taking into account all relevant considerations such as the participant’s current or expected income and expenses; other public or private

⁸¹ MHDC has a “Sample Rental Assistance Agreement” located [here](#).

assistance for which the participant will be eligible and likely to receive; and the relative affordability of available housing in the area. Assistance cannot exceed 60 days during the period the program participant is seeking permanent housing.

Using Rental Assistance with Other Subsidies

Rental assistance cannot be provided to program participants receiving tenant-based rental assistance or living in a housing unit receiving project-based rental assistance or operating assistance through other public sources for the same time period. Rental arrears can be provided to households receiving rental subsidies for the tenant portion of the rent.

Rent Restrictions

Rental units must comply with rent reasonableness ([24 CFR 982.507](#)). Rent for unit assisted with ESG-CV must not exceed the rent reasonableness standard. Rent must be reasonable when compared to other units of similar location, type, size, and amenities within the community. Requirements do not apply for households not receiving ESG-CV rental assistance. Compliance with this requirement can be documented using the CV-206 Rent Reasonableness form.

Lead-Based Paint and Minimum Habitability Standards

All housing occupied by ESG-CV program participants must be inspected for lead-based paint in accordance with [24 CFR 35](#). ESG-CV funds must be used to help participants obtain or maintain housing that meets either the minimum habitability standards from [24 CFR 576.403](#) or the Housing Quality Standards (HQS) under [24 CFR 982.401](#)⁸².

Records to Maintain – Program Participants

Record	Criteria
Homelessness Status and Eligibility Certification	<ul style="list-style-type: none"> Form CV-104⁸³
Income Worksheet, as applicable	<ul style="list-style-type: none"> Form CV-201
Supporting Documentation of Sources of Income at annual recertification	<ul style="list-style-type: none"> Third-party verification of proof of gross annual income is needed for all members of the household age 18 and over Minimum of two pay stubs reflecting frequency of pay and current within 30 days Pay stubs, SSI/SSDI award letter/printout, child support statement, EBT statement for TANF If income source documents are unobtainable, CI-112 Income Verification form may be completed. Agencies must document their attempts to obtain

⁸² When certifying HQS, [24 CFR 982.401\(j\)](#) need only be applied to housing occupied by program participants receiving tenant-based rental assistance.

⁸³ Not necessary for clients who are receiving no ESG-CV services other than Vaccine Incentives, Vaccine and Testing Transportation, or both. These clients can certify their homelessness status using the CV-218.

Photo Identification	<ul style="list-style-type: none"> • Needed for all members of the household age 18 and over • Driver's license, State ID, temporary ID/license, school ID with photo, passport-U.S. or foreign, U.S. passport card, permanent resident card, etc. • If proof of ID is unavailable upon entry, agencies must adequately document efforts to obtain these and follow up in case management notes when ID has been received
Initial Consultation Documentation	<ul style="list-style-type: none"> • Agency Intake Documentation
Case Management Documentation	<ul style="list-style-type: none"> • Assessing, arranging, coordinating, and monitoring delivery of services to facilitate housing stability • Notes must be dated and detail housing goals, plans, referrals
Proof of Need	<ul style="list-style-type: none"> • Documentation provided by participant to determine amounts/types of assistance needed for the household to gain stability in permanent housing • Utility bills, lease, arrears, and/or eviction documentation
Proof of Payment for ESG-CV reimbursement	<ul style="list-style-type: none"> • Canceled check or bank statement showing payments cleared highlighted and/or returned checks log
Rental Assistance Agreement	<ul style="list-style-type: none"> • Agreement between the landlord and ESG-CV grantee • Applicable only to households receiving ongoing rental assistance
Lease or Sublease	<ul style="list-style-type: none"> • Lease between program participant and landlord or sublease between the program participant and the lease holder • Households assisted with ongoing rental assistance must have a written lease or sublease for the rental unit
Habitability Inspection	<ul style="list-style-type: none"> • Form ESG-205 (PH version) or HQS certification
Lead-based Paint Inspection	<ul style="list-style-type: none"> • Form ESG-207, ESG-208
Rent Reasonableness Certification	<ul style="list-style-type: none"> • Form CV-206
Consent Form	<ul style="list-style-type: none"> • Form CI-108 or CI-108-DV
Social Security Identification	<ul style="list-style-type: none"> • Card/number needed for all members of the household • Social Security Card, printout from social security office • If proof of ID is unavailable upon entry, agencies must adequately document efforts to obtain these and follow up in case management notes when ID has been received
Non-Identifying Identification Certification	<ul style="list-style-type: none"> • Form (CI-110) can be requested for use by Victim Service Providers (VSPs) by emailing the ESG-CV Grant Specialist
Vaccine Incentive Documentation	<ul style="list-style-type: none"> • Form CV-218 (only necessary for clients who receive Vaccine Incentives)

Rapid Rehousing Financial Process

After incurring Rapid Rehousing expenses, grantees may submit for payment using MHDC's [grant interface](#). Using the following forms,⁸⁴ agencies are expected to completely fill out the online form, and

⁸⁴ The CV-212 can be accessed [here](#).

then attach a pdf that includes the following documents:

- CV-212 (Completely fill out the Rapid Rehousing expense detail tab)
 - If you do not have any indirect expenses (such as caseworker salaries) it is not necessary to fill out or attach this form.
 - Do **NOT** outline direct assistance expenses on the expense detail form.
- Rapid Rehousing HMIS Report (list that outlines the client ID, service type, service date, vendor paid, and amount paid.)

Common reasons that Rapid Rehousing payment requests are discarded:

- Housing services or direct assistance expenses are incurred outside of the eligible funding period.
- Amount requested is greater than the amount remaining in the grant balance.
- Expenses included on the Rapid Rehousing Expense Detail are not listed as eligible in the ESG-CV Desk Guide or HUD's Consolidated Federal Regulations (CFR).
- HMIS report does not provide client-specific data.

Program Guidelines

Standards for what should be included in Rapid Rehousing program guidelines can be found at <https://www.endhomelessnessmo.org/gceh-policies> and on MHDC's [website](#). Per [24 CFR 576 Subpart E](#), every ESG-CV grantee must develop and implement program guidelines that include:

- Procedure for determining and prioritizing which eligible individuals and families will receive Homeless Prevention and which eligible individuals and families will receive Rapid Rehousing assistance.
- Procedure for determining what percentage or amount of rent and utilities cost each program participant must pay while receiving Rapid Rehousing assistance.
- Procedure for determining how long a program participant will be provided rental assistance and whether and how the amount of that assistance will be adjusted over time.
- Procedure for determining the type, amount, and duration of housing stabilization and/or relocation services to provide, including the limits, if any, on the Rapid Rehousing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months in the program, or the maximum number of times the program participant may receive assistance.
- Policy for addressing the needs of ineligible applicants.

HMIS

Homeless Management Information System (HMIS) or comparable database participation is a requirement of receiving ESG-CV funds. Therefore costs associated with contributing data to the HMIS or comparable database are eligible for reimbursement ([24 CFR 576.107](#)) for agencies funded under the HMIS component. Activities must comply with HUD's standards on participation, data collection and reporting, including compliance with HUD's [2022 HMIS Data Dictionary](#) and [2022 HMIS Data Standard Manual](#). In addition, the [2020 ESG Program HMIS Manual](#) addresses the use of HMIS for ESG, to complement and support data collection and reporting efforts of HMIS users⁸⁵.

Eligible Activities – HMIS

In response to coronavirus, HUD has waived the limitations on eligible activities provided in section 415(a) of the McKinney-Vento Act and [24 CFR 576 Subpart B](#) are waived to the extent necessary to authorize ESG-CV funds to be used under [24 CFR 576.107](#) to pay for HMIS costs beyond where they are related to collecting data on ESG-CV program participants and ESG-CV program activities to the extent they are necessary to help the geographic area prevent, prepare for, and respond to coronavirus. Additionally, [24 CFR 576.107](#) that limits recipients to paying for the costs at [24 CFR 576.107\(b\)](#) has been waived to allow recipients that are not the HMIS Lead, as designated by the CoC, to pay for costs at [24 CFR 576.107\(b\)](#), either directly or by sub-granting to the HMIS Lead if the HMIS Lead is an eligible subrecipient to the extent that the HMIS costs are necessary to help the geographic area prevent, prepare for, and respond to coronavirus. Therefore, the following costs are eligible for all grantees funded with HMIS:

- Hardware, equipment and software costs:
 - Purchasing or leasing computer hardware
 - Purchasing software or software licenses
 - Purchasing or leasing equipment, including telephones, taxes, and furniture
- Staffing:
 - Salaries for operating the HMIS
 - Data collection and reporting
 - Completing data entry
 - Monitoring and reviewing data quality
 - Completing data analysis
- Training staff on using the HMIS or comparable database:
 - Implementing and complying with HMIS requirements

⁸⁵ See [Appendix D](#) for additional HMIS resources.

- Training and overhead
- Obtaining technical support
- Leasing office space
- Paying charges for electricity, gas, water, phone service and high-speed data transmission necessary to operate or contribute data to the HMIS
- Paying costs of staff to travel to and attend HUD-sponsored and HUD-approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act⁸⁶
- Paying staff travel costs to conduct intake
- Paying participant fees charged by the HMIS lead agency
- Hosting and maintaining HMIS software or data
- Backing up, recovering, or repairing HMIS software or data
- Administering the HMIS system
- Reporting to providers, the CoC, HUD, and MHDC
- Conducting training on using the system or a comparable database, including travel
- Assessing if victim services providers databases are HMIS comparable and providing verification to MHDC

Eligible Activities – Disease Mitigation Training

Training specifically on infectious disease prevention and mitigation for ESG-CV funded staff working directly to prevent, prepare for, and respond to coronavirus among persons who are homeless or at risk of homelessness with HMIS activities.

Records to Maintain – Administration

Activity	Acceptable Forms of Documentation (both Cost Incurred and Proof of Payment are required)	
	Cost Incurred	Proof of Cleared Payment
<ul style="list-style-type: none"> ● Bills paid ● Services performed ● Materials purchased 	<ul style="list-style-type: none"> ● Invoice ● Receipt 	<ul style="list-style-type: none"> ● Canceled checks or bank statement with ESG-CV payments highlighted

⁸⁶ Grantees must verify with MHDC that the ESG-CV training is HUD-sponsored prior to requesting reimbursement for any costs associated with attending them

<ul style="list-style-type: none"> • Travel costs 	<ul style="list-style-type: none"> • Travel request which includes date(s) of travel, from/to, purpose of travel, supporting documentation 	<ul style="list-style-type: none"> • Canceled checks, bank with ESG-CV payments highlighted
<ul style="list-style-type: none"> • Employee Compensation 	<ul style="list-style-type: none"> • Timesheets signed by supervisor and employee detailing eligible ESG-CV activities • Pay stub or payroll report from a third party listing pay periods, employee listed, last four digits of SSN 	<ul style="list-style-type: none"> • Copy of pay stub or payroll report from third party • Bank statement with ESG-CV payments highlighted

HMIS Financial Process

After incurring HMIS expenses, grantees may submit for payment using MHDC's [grant interface](#). Using the following forms,⁸⁷ agencies are expected to completely fill out the online form, and then attach a pdf that includes the following documents:

- CV-212 (Completely fill out the HMIS expense detail tab)⁸⁸

Common reasons that HMIS payment requests are discarded:

- Expenses are incurred outside of the eligible funding period.
- Amount requested is greater than the amount remaining in the grant balance.
- Expenses included on the HMIS Expense Detail are not listed as eligible in the ESG-CV Desk Guide or HUD's Consolidated Federal Regulations (CFR).

⁸⁷ The CV-212 can be accessed [here](#).

⁸⁸ An HMIS report is not required when submitting for HMIS grant types.

Administration

The Administration component is intended to support ESG-CV Grantees' costs incurred to meet the grant requirements ([24 CFR 576.108](#)). As permitted by the CARES Act, ESG-CV grantees may receive up to 10 percent (10%) of a grant award for administrative costs if funded under the Administration component. Staff and overhead costs directly related to carrying out Street Outreach, Standard Emergency Shelter, Temporary Emergency Shelter, Homelessness Prevention, Rapid Rehousing, and HMIS activities are not eligible to be reimbursed under Administration.

Eligible Activities

General Management, Oversight, and Coordination

Salaries, wages, and related costs of the recipient's staff, the staff of subrecipients, or other staff engaged in program administration. In charging costs to this category, the recipient may use one of the following methods:

1. Include the entire salary, wages, and related costs allocable to the program of each person whose primary responsibilities with regard to the program involve program administration assignments; or
2. Include the pro rata share of the salary, wages, and related costs of each person whose job includes any program administration assignments.

The recipient may use only one of these methods for each fiscal year grant. Program administration assignments include the following:

- Preparing program budgets and schedules, and amendments to those budgets and schedules
- Developing systems for assuring compliance with program requirements
- Developing interagency agreements and agreements with contractors to carry out program activities
- Monitoring program activities for progress and compliance with program requirements
- Preparing reports and other documents directly related to the program for submission to HUD
- Coordinating the resolution of audit and monitoring findings
- Evaluating program results against stated objectives
- Managing or supervising persons whose primary responsibilities with regard to the program include such assignments as those described above

Administrative services performed under third party contracts or agreements are also eligible, including:

- General legal services
- Accounting services

- Monitoring services
- Audit services

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

Training on ESG-CV Requirements

- Costs of providing training on ESG-CV requirements
- Costs of attending HUD-sponsored ESG-CV trainings⁸⁹

Records to Maintain – Administration

Activity	Acceptable Forms of Documentation (both Cost Incurred and Proof of Payment are required)	
	Cost Incurred	Proof of Cleared Payment
<ul style="list-style-type: none"> • Bills paid • Services performed • Materials purchased 	<ul style="list-style-type: none"> • Invoice • Receipt 	<ul style="list-style-type: none"> • Canceled checks or bank statement with ESG-CV payments highlighted
<ul style="list-style-type: none"> • Travel costs 	<ul style="list-style-type: none"> • Travel request which includes date(s) of travel, from/to, purpose of travel, supporting documentation 	<ul style="list-style-type: none"> • Canceled checks, bank with ESG-CV payments highlighted
<ul style="list-style-type: none"> • Employee Compensation 	<ul style="list-style-type: none"> • Timesheets signed by supervisor and employee detailing eligible ESG-CV activities • Pay stub or payroll report from a third party listing pay periods, employee listed, last four digits of SSN 	<ul style="list-style-type: none"> • Copy of pay stub or payroll report from third party • Bank statement with ESG-CV payments highlighted

Administration Financial Process

After incurring Administration expenses, grantees may submit for payment using MHDC's [grant interface](#).

⁸⁹ Grantees must verify with MHDC that the ESG-CV training is HUD-sponsored prior to requesting reimbursement for any costs associated with attending them.

Using the following forms,⁹⁰ agencies are expected to completely fill out the online form, and then attach a pdf that includes the following documents:

- CV-212 (Completely fill out the Admin expense detail tab)⁹¹

Common reasons that Administration payment requests are discarded:

- Expenses are incurred outside of the eligible funding period.
- Amount requested is greater than the amount remaining in the grant balance.
- Expenses included on the HMIS Expense Detail are not listed as eligible in the ESG-CV Desk Guide or HUD's Consolidated Federal Regulations (CFR).

Ineligible Activities

Ineligible activities include, but are not limited to:

- Damage costs outside of the security deposit
- Mortgage payments
- Late fees accrued by the grantee
- Grantee employee salary advances
- Renovations
- Vehicles
- Travel to CoC Meetings or trainings

⁹⁰ The CV-212 can be accessed [here](#).

⁹¹ An HMIS report is not required when submitting for Administration expenses.

Other Federal Requirements

Involuntary Family Separation

Per [24 CFR 578.93](#), HUD-funded shelters and assisted housing are prohibited from causing involuntary family separation. The age and gender of a child under age 18 must not be used as a basis for denying any family's admission to a project that receives funds under this part. There are exceptions for housing for specific subpopulations, grantees should review the full rule to ensure full compliance.

Equal Access in Accordance with an Individual's Gender Identity

In accordance with [24 CFR 5.105](#), providers that operate single-sex projects using funds awarded through the HUD's Office of Community Planning and Development will now be required to provide all individuals, including transgender individuals and other individuals who do not identify with the sex they were assigned at birth, with access to programs, benefits, services, and accommodations in accordance with their gender identity without being subjected to intrusive questioning or being asked to provide documentation. This requirement includes tenant selection and admission preferences. Grantees must establish, amend, or maintain program admissions, occupancy, and operating policies and procedures (including policies and procedures to protect individuals' privacy and security), so that equal access is provided to individuals based on their gender identity.

Violence Against Women Act

The Violence Against Women Act (VAWA) prohibits denial of or termination of assistance solely due to an individual or family being a victim of domestic violence, dating violence, stalking, or sexual assault. VAWA also establishes program participants' right to emergency transfers for victims who are in fear for their life and safety to move to housing that they deem safe. This act requires housing providers/programs that administers ESG-CV rental assistance to notify all program participants of their rights under VAWA using HUD's Notification of Occupancy Rights at application, denial, or termination of assistance and at notification of eviction. Providers must also adopt HUD's model emergency transfer plan. Victims have a right to expressly request a relocation if they reasonably believe they are in imminent harm if they remain in the same dwelling. Program participants only need to self-certify using HUD's VAWA Protections and Certification Form. Providers must document requests and outcomes for emergency transfer requests which are required to be reported to MHDC and HUD. ESG-CV funds may be used to pay amounts owed for breaking lease to effect an emergency transfer; these costs are not subject to the 24 month limit on rental assistance. All rental assistance agreements between the landlord and the housing provider must specify that landlord will provide copy of notice to vacate/eviction proceedings to the ESG-CV program. The VAWA Lease Addendum, HUD-91067, is available on the MHDC website [here](#).

APPENDIX

Appendix A – Grant Documents

Grant Documents consist of:

- Grant Agreement
- Site Contact Form
- Attachment B: Federal Funding Accountability and Transparency Act
- CI-101 Authorized Signature Card
- CI-100 Direct Deposit Form and Voided Blank Check
- CV-200 Program Guidelines Certification
- CV-215 Temporary Emergency Shelter Status Verification⁹²
- Program Guidelines
- E-Verify Memorandum of Understanding (MOU)
- Certificate of Liability Insurance (COI)
- United Way 2-1-1 Registration

Before any funds can be released, all required grant documents must be completed and received by MHDC. All documents must be submitted in the [Grant Interface](#). Grantees with multiple ESG-CV grants must submit required documentation for each grant (i.e., agencies cannot submit one of each required document for multiple ESG-CV grants).

Grant Agreement

Description

The grant agreement is required for all grantees. The grant agreement specifically details the requirements and expectations for the administration of the grant. It is the grantee's responsibility to know and adhere to all provisions set forth in the grant agreement.

Completion Instructions

The following sections of the grant agreement must be completed by grantee:

⁹² Only required for grantees who are awarded funds for the Temporary Emergency Shelter component.

- Signature page (requires signature)
- Rider B (requires signature)
- Exhibit 1: Workforce Eligibility Affidavit (check one box, requires signature)
- Exhibit 2: Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion (requires signature)
- Exhibit 3: ESG-CV Program Certifications (requires signature)

All signatures must be original and by an authorized signatory as designated in the Authorized Signature Card. The entire original signed and notarized agreement must be returned to MHDC to be considered complete. If any pages of the grant agreement are missing, the grant agreement will be considered incomplete. Failure to submit a fully complete, properly executed grant agreement can result in recapture of the grant.

Site Contact Form

Description

The Site Contact Form includes all necessary information for MHDC to be in correspondence with the grantee. It is originally completed by the grantee prior to the completion and submission of the grant agreement. After the initial submission, it is the grantee's responsibility to contact MHDC and edit the form if any of the information needs to be updated.

Completion Instructions

Grantee can access the form through the Grant Interface. Grantee should complete all fields on the form and submit it electronically through the Grant Interface.

Attachment B: Federal Funding Accountability and Transparency Act

Description

Attachment B requires information for federal grants over \$25,000 be made available to the public via a single website.

Completion Instructions

Grantee should complete all fields on the form, and it must be signed with an original signature as designated on the Authorized Signature Card.

Authorized Signature Card (CI-101)

Description

This form designates all authorized signatories for each grant. All documents that are required to be signed by grantee must be signed by authorized signatories only. If an unauthorized person signs a document, the document will be rejected. It is the responsibility of the grantee to update this form as needed.

Completion Instructions

Form must designate at least two authorized signatories. The form must have original signatures from all designated signatories (i.e., no signature stamps should be used). Please note the authorizing official must sign in the Authorizing Official box as well as at the bottom of the form.

Direct Deposit Form (CI-100) and Blank Check

Description

All disbursements from MHDC to grantee will occur using an Electronic Funds Transfer (EFT). This Direct Deposit Form provides MHDC with the grantee's banking information for the electronic transfer. A blank voided check from the indicated banking institution is also required to be submitted with the Direct Deposit form. If the agency does not have access to a blank voided check, a letter from the bank confirming the account and routing number will be accepted. Please note that by default your agency banking information will be updated for **ALL** MHDC accounts. If the banking information provided is for Emergency Solutions or one grant **ONLY**, then it must be indicated on the Direct Deposit form.

Completion Instructions

Form must be signed with original signatures by authorized signatory.

Program Guidelines Certification (CV-200) and Program Guidelines

Description

This form ensures that ESG-CV grantees have created and implemented program guidelines that address all applicable requirements specified in [24 CFR 576.400\(e\)](#).

Completion Instructions

Place a checkmark next to each applicable standard, signed by authorized signatory, submitted with a copy of all required program guidelines.

Temporary Emergency Shelter Status Verification (CV-215)

Description

This form is necessary to verify that a temporary emergency shelter has been determined by State or local health officials to be necessary to prevent, prepare for, and respond to coronavirus in their community.

This form is only required for grantees who were awarded funding for the Temporary Emergency Shelter component and should be included in the grant agreement submission.

Completion Instructions

This form needs to be filled out and signed by two parties: an employee from the funded organization and a State or local health official. The staff member must fill in the basic information about the shelter at the top of the page and answer the two “Shelter Description” questions. The answers to the two essay questions should be very detailed and address every aspect of the question. The staff member must then sign and date the form. A public health official must sign, date, and fill out the bottom portion of the form. They must be a qualified public health official and will certify that the shelter is necessary to prevent, prepare for, and respond to coronavirus in their community. This certification should be based on the information provided by the staff member in the form. They are not required to visit the physical location, view pictures of the site/structure, or take any other measures in order to certify the shelter validly, although taking such measures are not prohibited and are up to the sole discretion of the public health official.

E-Verify Memorandum of Understanding (MOU)

Description

The E-Verify MOU is an agreement between the Department of Homeland Security (DHS) and Grantee stating that grantee agrees to participate in the Employment Eligibility Verification Program (E-Verify).

Completion Instructions

Grantee with no prior ESG history shall submit a copy of the full and complete MOU generated from DHS’ online E-Verify system. Providing only the signature page will not be acceptable.

Certificate of Liability Insurance (COI)

Description

The Certificate of Insurance is a one page summary of current Liability Insurance held by grantee. The insurance held by grantee may include: General Liability, Automobile Liability Umbrella Liability, Excess Liability, Worker’s Compensation and Employers’ Liability. The Certificate of Liability Insurance must be current. If coverage lapses during the grant year, grantee must provide MHDC with an updated Certificate.

Completion Instructions

Submit with grant documents, submit updated coverage as needed via [Grant Interface](#) software.

United Way 2-1-1 Registration

Description

United Way 2-1-1 is a phone number that individuals can call in order to receive needed resources in their area. In order to be a reliable resource for households in need, organization's need to submit updated information as changes arise.

Completion Instructions

Grantees are required to register/update their organization's information on the United Way's website, and print the webpage showing the organization's information is available. Additional instructions are located on the United Way's website at: <http://www.211helps.org/agency/get-listed>.

Appendix B – Client File Forms

Client File Forms consist of:

- CV-201 - Income Eligibility Worksheet
- CI-112 - Income Verification Worksheet
- CI-103 - Self-Declaration of Income
- CI-108 or CI-108-DV - Consent Form
- CV-104 - Homeless Certification
- ESG-205 - Habitability Standards Checklist
- CV-206 - Rent Reasonableness Certification
- ESG-207 - Lead Screening Worksheet
- ESG-208 - Property Owner Lead Certification Form
- CV-209 - Recertification Form
- CV-218 – Vaccine Incentive Form
- VAWA Lease Addendum

All forms can be found at: <http://mhdc.com/ci/CARES/ESGCV.htm>

Income Eligibility Worksheet (CV-201)

Applicable Components: Homelessness Prevention and Rapid Rehousing

Required: Yes

Description

This form is intended to be used to verify income eligibility for ESG-CV Rapid Rehousing or Homelessness Prevention.

Due Date

Income eligibility must be certified at initial intake for Homelessness Prevention, and re-certified every 180 days thereafter. Income eligibility does not need to be certified at program intake for Rapid Rehousing participants. It must be certified once the participant has received ESG-CV assistance for one year, and it should be re-certified at least annually thereafter. At each income eligibility certification, proof of income must be current within 30 days.

Completion Instructions:

Collect Supporting Documentation of Income

Service provider should collect and include the supporting documentation of all household income to be referred to when completing this form (e.g., check stubs, SSI/SSDI award letter/printout, child support statement, EBT statement for TANF, etc.). If supporting documentation cannot be provided by client, please utilize Income Verification form (CI-112).

Household Members

Complete Household information for all members of the household. The “Total Household Members” will automatically calculate depending on the number of persons listed in the Household Members section. The number of members in the household is important in determining the correct Area Median Income (AMI) for the county and household size; therefore, it is very important that all members of the household are included in that section.

50 percent (50%) of Area Median Income (AMI) for Household Size

List the current 50 percent (50%) of Area Median Income (AMI) amount applicable to the county where the household is sheltered or housed. These income limits are provided on the MHDC [website](#).

Sources of Income

This section the various sources of income that may be applicable to the household. Income will need to be detailed for all members 18 and older. The current gross income amount, frequency of pay, and number of payments per year need to be listed to calculate the annual gross income. All amounts detailed will total in the “Total Annual Gross Income from all Sources” field.

Determination of Income Eligibility

The service provider can then compare the “Total Annual Gross Income from all Sources” to the “50 percent AMI for Household Size” for the county of service to determine if household meets income eligibility requirements.

Submission / Retention

Retained in client file for every certification and re-certification

Income Verification Worksheet (CI-112)

Applicable Components: Homelessness Prevention and Rapid Rehousing

Required: Yes, if client has income but cannot provide documentation of income

Description

This form is intended to be completed by an employee of the place of employment or payment source representative to verify the individual’s income.

Due Date

Income eligibility must be certified at initial intake for Homelessness Prevention, and re-certified every 180 days thereafter. Income eligibility does not need to be certified for Rapid Rehousing participants until they have received ESG-CV assistance for one year, and it should be re-certified at least once annually thereafter. At each income eligibility certification, proof of income must be current within 30 days.

Completion Instructions

Grantee will complete the top section of the form detailing where the form should be returned. The individual seeking assistance will sign and date the form authorizing the employer or payment source representative to release the individual's income information. The employer/payment source representative will then complete the bottom half of the form, listing the client's income information, as well as the contact information and signature.

Submission Instructions

Retained in client file

Self-Declaration of Income (CI-103)

Applicable Components: Homelessness Prevention and Rapid Rehousing

Required: Yes – All members of household, 18 and over

Description

A Self-Declaration of Income form must be completed and signed by all recipients of the household, age 18 and over.

Due Date

Income eligibility must be certified at initial intake for Homelessness Prevention, and re-certified every 180 days thereafter. Income eligibility does not need to be certified for Rapid Rehousing participants until they have received ESG-CV assistance for one year, and it should be re-certified at least once annually thereafter. At each income eligibility certification, proof of income must be current within 30 days.

Completion Instructions

All members of household, 18 and over must sign a Self-Declaration of Income. The date of the form must be within 30 days of the instance of assistance. The original, signed form should be retained in the client file.

Consent Form (CI-108 or CI-108-DV)

Applicable Components: Standard Emergency Shelter, Temporary Emergency Shelter, Homelessness Prevention, and Rapid Rehousing

Description

The consent form must be completed and signed by head of household at each certification.

Completion Instructions

The head of household must sign the Grant Recipient's Consent to Release Information. The head of household must also check one of the boxes at the bottom of the consent form certifying whether or not housing is safe, decent, and sanitary. If a box is not checked then the form is not considered complete. If recipient checks the "IS NOT" box, please address agency's efforts to remedy the housing conditions in the participant's file. The original signed form retained in client file. If the client notifies agency at any time after signing the Consent Form, that they do not feel their housing is safe, decent and sanitary, then they need to address these concerns with the program participant.

CI-108-DV

Clients of domestic violence providers should list their initials in order to protect confidentiality.

Homeless Certification (CV-104),

Applicable Components: Street Outreach, Standard Emergency Shelter, Temporary Emergency Shelter, Homeless Prevention, and Rapid Rehousing

Required: Yes, required to document household's homeless status

Description

Grantee must verify the homeless status of all individuals and families seeking ESG-CV assistance. Grantees must attempt to gather housing status documentation in order of HUD's preferences as mentioned above under "Documenting Homeless Status".

Habitability Standards Checklist (ESG-205)

Applicable Components: Standard Emergency Shelter, Homeless Prevention, and Rapid Rehousing

Required: Yes, for any Standard Emergency Shelter assisted with ESG-CV funds or any permanent housing unit assisted with ESG-CV funds that has not been certified to meet the Housing Quality Standards (HQS).

Description

Standard emergency shelters should verify that all standards listed on ESG-205 Minimum Standards for Standard Emergency Shelters checklist are met. Grantees using ESG-CV funds for Homelessness Prevention or Rapid Rehousing must conduct inspections of housing units to ensure they meet standards detailed on ESG-205 Minimum Standards for Permanent Housing, unless the unit has already been certified to meet Housing Quality Standards (HQS).

Rent Reasonableness Certification (CV-206)

Applicable Components: Homeless Prevention- Rental Assistance and Rapid Rehousing- Rental Assistance

Required: Yes

Description

Rent for unit assisted with ESG-CV must not exceed the Rent Reasonableness standard. Rent must be reasonable when compared to other units of similar location, type, size, and amenities within the community.

Lead Screening Worksheet (ESG-207)

Applicable Components: Homeless Prevention and Rapid Rehousing

Required: Yes, [24 CFR 576.403\(a\)](#)

Description

Housing occupied by program participants must be visually inspected for lead-based paint in order to certify compliance with ESG-CV's shelters and housing occupied by program participants. Instructions for completion are detailed on the form.

Property Owner Lead Certification Form (ESG-208)

Applicable Components: Standard Emergency Shelter, Temporary Emergency Shelter, Homeless Prevention and Rapid Rehousing

Required: Yes, if visual assessment reveals problems with paint surfaces. ESG-CV assistance cannot be provided to a unit with paint surface issues unless issues are fixed as certified by this form.

Description

To be completed by property owners/managers to certify that paint surfaces have been repaired in accordance with the guidelines of [24 CFR 35](#), Parts A, B, M, and R

Recertification Form (CV-209)

Applicable Components: Homeless Prevention and Rapid Rehousing

Required: Yes

Description

Recertification form documents an individual or family's eligibility factors for continued ESG-CV assistance and tracks the assistance provided to date. Applicants for Homeless Prevention must be evaluated for eligibility at initial intake and every 180 days. Rapid Rehousing program participants must be evaluated at least once annually after one year of ESG-CV assistance.

Vaccine Incentive Form (CV-218)

Applicable Components: Street Outreach, Standard Emergency Shelter, Temporary Emergency Shelter, Homeless Prevention, and Rapid Rehousing

Required: Yes, for clients who receive Vaccine Incentives

Description

This form documents each vaccine dose program participants are receiving vaccine incentive payments for. Completion of the form is done by grantee staff and documents when the dose was received, which vaccine was administered, a certification by the staff member that they were provided proof of the dose via an official COVID-19 Record Card.

This form also allows the staff member to certify that the program participant has not received any other vaccine incentives and no other incentives are available in the community for them to receive.

Additionally, the form has a section to certify the homelessness status of the program participant. This section is not required if the program participant certifies their homelessness status with the CV-104. If the program participant is not receiving any ESG-CV services other than Vaccine Incentives, Vaccine and Testing Transportation, or both, then they do not need to fill out the CV-104 to certify their homelessness status. These clients can certify their homelessness status using the CV-218 instead.

VAWA Lease Addendum

Applicable Components: Homeless Prevention and Rapid Rehousing

Required: Yes

Description

The lease for the above reference unit is being amended to include the provisions of the Violence Against Women Act (VAWA).

Appendix C – Grant Close-Out Documents

Grant Close-Out Documents consist of:

- Homeless Participation Certification

All forms will be submitted through [Grant Interface](#).

Homeless Participation Certification

Description

Grantee must include at least one current or formerly homeless member on its board of directors or equivalent decision-making entity of the sub-grantee ([24 CFR 576.405](#)).

Completion Instructions

Signed letter from sub-grantee's Board president must be submitted, including:

- Verification that agency has at least one member that is currently or formerly homeless currently participating on the Board of Directors
- Explanation of how this individual is involved in agency policy decision-making process directly related to ESG-CV program
- Process agency and Board of Directors uses to ensure requirement is fulfilled
- If agency is not currently in compliance, include date and plan for meeting this requirement

Appendix D – Sources and Resources

[24 CFR 576](#): Code of Federal Regulations (CFR) Title 24 HUD, Part 576 for the Emergency Solutions Grants Program

[ESG-CV Income Limits](#): The 50 percent Area Median Income (AMI) Limits for Missouri

[ESG Law, Regulations, and Notices](#): HUD Exchange homepage for the ESG program

[Disease Risk and Homelessness](#): HUD Exchange homepage for coronavirus updates and resources

[ESG-CV Guidelines](#): CPD-21-08 titled “Waivers and Alternative Requirements for the Emergency Solutions Grants (ESG) Program Under the CARES Act”

[MHDC ESG-CV](#): MHDC’s webpage for the ESG-CV program

[MHDC Compliance Guidance](#): MHDC’s library of compliance resources

[2022 HMIS Standard Manual](#): HUD Exchange webpage including updated HMIS Data Standards, Data Dictionary, and more

[ESG Program HMIS Manual](#): HUD Exchange webpage for ESG specific HMIS Manual

[Housing First](#): “Home, Together: The Federal Strategic Plan to Prevent and End Homelessness”

[End Homelessness Missouri](#): Missouri Interagency Council on Homelessness

[Show Me Strong MO](#): Missouri’s “Show Me Strong Recovery Plan” to coronavirus

[Foundant](#): MHDC’s Grant Interface software

[2-1-1 Missouri](#): United Way’s database for homelessness resources in Missouri

[MO Housing Resources](#): MHDC’s webpage for renters, landlords, homeowners, and others who are seeking housing resources in the State of Missouri.

Appendix E – Definitions

Responsible Entity

With respect to the environmental responsibilities under ESG-CV, a recipient under the program. As a direct recipient of the state, MHDC will act as the Responsible Entity.

Prevent...coronavirus

An activity designed to prevent the initial or further spread of the coronavirus to people experiencing homelessness, people at risk of homelessness, recipient or subrecipient staff, or other shelter or housing residents. This includes providing Personal Protective Equipment to staff and program participants, paying for non-congregate shelter options such as hotels and motels, paying for handwashing stations and portable toilets for use by people living in unsheltered situations, and providing Rapid Rehousing or Homelessness Prevention assistance to individuals and families who are homeless or at risk of homelessness (as applicable) to reduce their risk of contracting or further spreading the coronavirus.

Prepare for...coronavirus

An activity carried out by a recipient or subrecipient prior to or during a coronavirus outbreak in their jurisdiction to plan to keep people healthy and reduce the risk of exposure to coronavirus and avoid or slow the spread of disease. This includes updating written standards to prioritize people at severe risk of contracting coronavirus for shelter and housing consistent with fair housing and nondiscrimination requirements, adapting coordinated entry policies and procedures to account for social distancing measures or increased demand, developing a strategy and recruiting landlords to provide housing to people experiencing homelessness or at risk of homelessness, training homeless providers on infectious disease prevention and mitigation, and implementing a non-congregate shelter strategy to reduce the spread of coronavirus.

Respond to coronavirus

An activity carried out once coronavirus has spread to people experiencing homelessness, provider staff, or once individuals and families lose or are at risk of losing their housing as a result of the economic downturn caused by coronavirus. This includes transporting individuals and families experiencing homelessness to medical appointments, paying for shelter to isolate individuals who have contracted coronavirus from other program participants and people experiencing homelessness, providing rental assistance to those who are at risk of losing their housing, have already become homeless, or continue to experience homelessness due to the economic downturn caused by coronavirus, and providing hazard pay to recipient or subrecipient staff who put their own health at risk to continue to provide necessary services to individuals and families experiencing and risk of homelessness.

Comparable Database

A relational database that meets all HMIS Data Standards and the minimum standards of HMIS privacy and security requirements, including HUD's most recent reporting standards and comma separated value (CSV) format specifications. The most recent standards, published April 2021, can be found [here](#).

Duplication of Benefits

When Federal financial assistance is provided to a person or entity through a program to address losses resulting from a Federally-declared emergency or disaster, and the person or entity has received (or would receive, by acting reasonably to obtain available assistance) financial assistance for the same costs from any other source (including insurance), and the total amount received exceeds the total need for those costs.

Standard and Temporary Emergency Shelter (Component)

This component includes expenses for providing essential services for families and individuals in standard emergency shelters, operating standard emergency shelters.

For the ESG-CV program, HUD introduced a new type of shelter: temporary emergency shelters. In accordance with the HMIS reporting format for ESG-CV, the Emergency Shelter component has two separate components:

- Standard Emergency Shelter
- Temporary Emergency Shelter

Organizations will apply for and be awarded these two components separately. ESG-CV awards for the Standard Emergency Shelter component may not be spent on expenses for the Temporary Emergency Shelter component, and vice-versa. For more details on which expenses are eligible under each component, please refer to the [Standard Emergency Shelter](#) and [Temporary Emergency Shelter](#) sections.

Standard and Temporary Emergency Shelters (Physical Space/Structure)

A facility, structure, or portion of a structure that serves to provide temporary shelter for the homeless that does not require any prerequisite occupancy agreements. All emergency shelters are classified as one of the following:

1. **Standard emergency shelter:** Any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements.
2. **Temporary emergency shelter:** Any structure or portion of a structure, which is used for a limited period of time because of a crisis, such as a natural disaster or public health emergency, to provide shelter for individuals and families displaced from their normal place of residence or sheltered or unsheltered locations. Must be determined by State or local health officials to be necessary to

prevent, prepare for, and respond to coronavirus in order to be defined as a temporary emergency shelter.

If an emergency shelter meets the definitions of both standard and temporary emergency shelters, it is classified EXCLUSIVELY as a temporary emergency shelter.