EMERGENCY SOLUTIONS GRANT
DESK GUIDE
2018
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Introduction

Purpose

The Emergency Solutions Grant (ESG) is intended to: (1) engage homeless individuals and families living on the street; (2) improve the number and quality of emergency shelters for homeless individuals and families; (3) help operate these shelters; (4) provide essential services to shelter residents, (5) rapidly re-house homeless individuals and families, and (6) prevent families and individuals from becoming homeless. ESG funds are intended to be used as part of a crisis response system using a low barrier, housing-focused approach to ensure that homelessness is rare, brief, and non-recurring.

Establishment of Funds

These funds are 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) which authorized the Emergency Solutions Grant (ESG) Program for the purpose of providing assistance to persons who are homeless or at risk of homelessness. The Missouri Housing Development Commission (MHDC) is responsible for administering the Missouri State Allocation of the Department of Housing and Urban Development (HUD) Emergency Solutions Grant (ESG) Program funds granted to MHDC by the Missouri Department of Social Services (DSS).

Regulations and Authority

The Missouri ESG Program is administered under the provisions of the HUD regulations at 24 CFR Part 576, as well as the agency’s executed grant agreement, and the 2018 ESG Desk Guide. Grantees are encouraged to review all HUD ESG program requirements. Resources and links to ESG law, regulations, and notices can be found at: https://www.hudexchange.info/programs/esg/. MHDC has flexibility in certain areas of administering the ESG 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 2018 Desk Guide.

Eligible Program Components

Street Outreach

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

Emergency Shelter

Intended to increase the quantity and quality of temporary shelter provided to homeless individuals and families by paying for operating and essential services expenses.
**Homelessness Prevention**
Intended to prevent households from becoming homeless through rental assistance and housing relocation and stabilization services.

**Rapid Re-housing**
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 recipients’ participation in the HMIS collection and data analysis of households that are homeless or at risk of homelessness.
GRANT ADMINISTRATION

General Information

Contacts

Below are the ESG contacts for funded agencies. Please direct all questions, concerns, updates and submission of documents to the Community Initiatives Coordinator, with the exception of Payment Requests. Payment Requests shall be submitted electronically to the Community Initiatives Department Accounting email address.

Please direct questions, concerns, and updates to:

Steve Whitson, Community Initiatives Coordinator
Missouri Housing Development Commission
920 Main, Suite 1400
Kansas City, MO 64105
(816) 759-6632
steve.whitson@mhdc.com

Please submit Payment Requests electronically to:
Community Initiatives Department Accounting
ci.accounting@mhdc.com

Website

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

Timeline

The following timeline lists the key dates for the 2018 grant year, 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 Year Begins: January 01, 2018
Quarter 1 (Q1): January 01, 2018 – March 31, 2018
Q1 Payment Request Deadline: April 02, 2018, 5:00 p.m.
*Quarter 1 CAPER Deadline: April 10, 2018
Quarter 2 (Q2): April 01, 2018 – June 30, 2018
Q2 Payment Request Deadline: July 03, 2018, 5:00 p.m.
<table>
<thead>
<tr>
<th>Quarter 2 CAPER Deadline:</th>
<th>July 10, 2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Quarter 3 (Q3):</td>
<td>July 01, 2018 – September 30, 2018</td>
</tr>
<tr>
<td>Q3 Payment Request Deadline:</td>
<td>October 02, 2018, 5:00 p.m.</td>
</tr>
<tr>
<td>*Quarter 3 CAPER Deadline:</td>
<td>October 10, 2018</td>
</tr>
<tr>
<td>Quarter 4 (Q4):</td>
<td>October 01, 2018 – December 31, 2018</td>
</tr>
<tr>
<td>Q4 Payment Request Deadline:</td>
<td>January 02, 2019, 5:00 p.m.</td>
</tr>
<tr>
<td>*Quarter 4 CAPER Deadline:</td>
<td>January 10, 2019</td>
</tr>
<tr>
<td>Quarter 5 (Q5):</td>
<td>January 01, 2019 – March 31, 2019</td>
</tr>
<tr>
<td>Last Day to Expend Funds:</td>
<td>March 31, 2019</td>
</tr>
<tr>
<td>Final Payment Request Deadline:</td>
<td>April 01, 2019, 5:00 p.m.</td>
</tr>
<tr>
<td>*Quarter 5 CAPER Deadline:</td>
<td>April 10, 2019</td>
</tr>
<tr>
<td>Close Out Deadline:</td>
<td>May 01, 2019</td>
</tr>
<tr>
<td>Final CAPER Submission Deadline:</td>
<td>May 01, 2019</td>
</tr>
</tbody>
</table>

*Submitted to MHDC by HMIS Lead Agencies for non-victim service providers  
*Victim service providers submit their own CAPER to MHDC

**Financial Processes**

**Funding Period**

All ESG funding provided to grantees must be used for expenses that are incurred and paid for on or after January 1, 2018 and before March 31, 2019.

**Request for Payment**

ESG grants are provided on a reimbursement basis only, therefore ESG funds must be expended on eligible activities for eligible program participants before funds can be requested. Before grantees can request reimbursement for FY2018, the following criteria must be met:

- All previous ESG grants must be completely closed out:
  - All previous ESG grant funds expended; and
  - Close out documentation received and approved.
- All current year grant documents are completed and received.
- All previous compliance issues are resolved (i.e., grantee is “in compliance”).

Once all of the above criteria are met and grantee has expended funds on eligible ESG activities, grantee may request FY2018 funds using the Payment Request Workbook (ESG-211) provided.

**Submission Requirements**

Funded agencies must submit Payment Requests and supporting documentation electronically by emailing the documents to the Community Initiatives Accounting email address listed below. Reimbursements are provided on a monthly basis. Payment Requests must be submitted on MHDC’s
approved payment request form (ESG-211). Agencies must submit a Payment Request no later than 5:00 p.m. on the first business day of the month in order to receive reimbursement for the funds expended. Payment Request submissions via mail or a different email address will not be accepted.

Please submit Payment Requests electronically to:
Community Initiatives Accounting: ci.accounting@mhdc.com

Required Signatories

Payment requests require a signature from an authorized signatory as detailed on the Authorized Signature Card (CI-101) required to be submitted with the grant documents and further detailed in Appendix A of this Desk Guide.

Supporting Documentation

ESG grantees are also required to submit supporting documentation, depending on the type of expenses, with the Payment Request which demonstrate how the funds were expended. Acceptable forms of documentation are detailed further under each program component section of this Desk Guide.

Quarterly Draws

Grantees must have a minimum of one disbursement of funds per quarter. Requests for Payment that result in a “discard” do not fulfill the Quarterly Draw requirements. ESG quarters and submission deadlines are detailed above under “Timeline”.

Spending Deadline

Grantees are required to spend at least 50 percent of the total granted amount on or before the end of the fourth quarter. MHDC has the discretion to recapture a portion or all remaining ESG funds as of this deadline.

Common Reasons for Discarded Payment Requests

- Certificate of insurance has expired
- Missing signatures from authorized signatories
- Missing supporting documentation
- Illegible submission
- Ineligible expenses detailed

Budget Amendments

ESG grantees may spend ESG funds on any eligible activity within a funding component (e.g. Rapid Re-housing dollars may be spent on any eligible Rapid Re-housing activity as outlined in the ESG CFR). In
certain instances, ESG grantees may request amendments to the original budget provided in the grant agreement in order to increase, decrease, or move funds to other components with MHDC approval. Grantees must submit an amendment request in writing via email to Community Initiatives Coordinator, Steve Whitson at steve.whitson@mhdc.com outlining the proposed amendment. Upon approval to move forward, an Amendment Request form (ESG-213) will be provided for completion. Amendments can only be requested and approved once per quarter. The amendment will detail the original budget, the proposed change, and the new budget and must explain why the amendment is needed. Once the form is completed and signed, it should be scanned and submitted electronically to Steve Whitson at steve.whitson@mhdc.com for final approval. If approved, a grant modification will be sent to the grantee for review and signature. The original copy must be received and executed before the budget change is finalized.

**Fixed Assets**

Grantee must provide MHDC a written request for approval of expenditures of assets including: equipment, computer equipment, software and other real and personal property that costs in excess of $5,000.00. Grantee 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 equal to or greater than $5,000.00 must be monitored by MHDC for the useful life of the asset and includes physical inspections and annual certifications.

**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 grantees are required to enter data on all persons served into the HMIS system recognized by their Continuum of Care. 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. Legal services organizations may choose to enter into a comparable database rather than a HMIS. The data must be entered into the HMIS system that represents the county of service. If the grantee serves persons with ESG funds in multiple Continua, HMIS data must be entered into the appropriate HMIS systems of those Continua. Grantees are responsible for ensuring that all data collection within HMIS and any comparable databases are in compliance with HUD HMIS Minimum Data Standards, therefore grantees should work with 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 they may have.
Reports

Quarterly Consolidated Annual Performance Evaluation Report (CAPER)

Grantees are required to generate a Consolidated Annual Performance Evaluation Report (CAPER) through a Comma Separated Value (CSV) export from their HMIS/Comparable Database for all ESG projects for which they are funded. The HMIS lead agency for each CoC will submit quarterly CAPER reports to MHDC on behalf of the agencies they serve. HMIS Lead grantees do not need to submit quarterly CAPER reports as this component does not directly serve individuals. HMIS Leads are required to submit quarterly CAPERs on the tenth day following the end of each quarter for all grantees in their CoC. Once completed, the CSV CAPER export zipped files should be emailed to steve.whitson@mhdc.com.

Agencies using HMIS comparable databases must submit their own individual CAPERS for each ESG component for which they are funded directly to MHDC.

Consolidated Annual Performance Evaluation Report (CAPER)

Grantees are required to communicate and work with their HMIS lead agency to generate data through a CAPER CSV export from their HMIS/Comparable Database for all ESG-funded projects for which they are funded. The CAPER CSV files for the period of April 1, 2018 through March 31, 2019 are due May 1, 2019. Each agency will upload the CAPER data directly into the online HUD SAGE portal via an email link sent by MHDC, as required by HUD. HMIS providers can guide users for data corrections. Each ESG-funded project must submit a CAPER CSV export. For more information, grantees may refer to: https://www.hudexchange.info/resources/documents/Sage-ESG-CAPER-Guidebook-for-ESG-funded-Programs.pdf.

Monitoring

In order to track a grantee’s program compliance, ensure accurate spending of ESG funds, prevent fraud and abuse, and to identify technical assistance needs, MHDC staff will monitor grantees’ by conducting on-site compliance reviews as well as a review of all financial documentation submitted to MHDC.

On-Site Compliance Visits

On-site compliance visits will be conducted at the location designated by the grantee. The MHDC Compliance Officer will review expenses billed to ESG that have already been reimbursed. The Compliance Officer will not review ESG expenses that have not yet been submitted for reimbursement. The information reviewed is gathered from the HMIS reports, comparable database reports and Administrative Expense Detail forms (ESG-212) submitted with the grantee’s Payment Requests. The Compliance Officer 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 kept.
The requested files are expected to be produced within fifteen (15) minutes of the Compliance Officer’s arrival. 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 grantee on the Site Contact form (CI-102).

* The only exception is if a staff member is assisting a client.

**Announced Visit**

The announced site visit is scheduled by the Compliance Officer with the grantee. If MHDC staff is unsuccessful in scheduling a site visit after three attempts have been made via telephone and/or e-mail, MHDC staff 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](http://www.mhdc.com/ci/compliance/index.htm).

**Unannounced Visit**

MHDC staff members have the right to conduct unannounced visits at the location(s) and times provided by the grantee in the Site Contact Form (CI-102). The hours of operation or closings listed in the CI-102 may be updated at any time via email to Steve Whitson. 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, agency’s prior history with ESG, concerns/deficiencies noted in grantee’s audit and/or financial statements, outcome of announced visit, and fulfilling grant requirements such as timely and accurate submission of Requests for Payment. 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 off all required documentation for compliance 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.

**Habitability Standards**

All emergency shelters funded with ESG must meet basic habitability standards as detailed in 24 CFR 576.403. Emergency shelters will be inspected during on-site compliance visits to ensure compliance with the minimum habitability standards. The Compliance Officer 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 Officer will note any deficiencies found in the post monitoring letter, and the grantee will need to provide documentation/photographs indicating that the
issues have been corrected. Agencies 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.

**Exit Interview**

At the conclusion of the site visit, the Compliance Officer 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 Officer. The Compliance Officer 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 documents any follow-up actions required by MHDC and/or grantee. The final compliance status is determined at the discretion of CI Management.

**Monitoring Letter**

After completing an on-site visit, MHDC staff 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.

**HMIS Lead Agencies**

MHDC will monitor HMIS lead agencies through a desk monitoring process requiring supporting documentation based on items selected on detail report forms submitted with payment requests by MHDC staff. 

**Compliance Violations**

**Out of Compliance**

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

If the grantee is found out of compliance they will need to 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, grantee may also be subject to a follow-up site visit 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 the CAP and/or follow-up site visit review, the Compliance Officer 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 review, the Compliance Officer will notify the grantee of their findings and funding will be suspended for all grants that the agency has been awarded through the Community Initiatives department.
**Consequences for Non-Compliance**

The following violations will be noted in grantee’s records, and points may be assessed during future application cycles:

- Grant partially or fully recaptured (i.e., funds not fully expended by the end of the grant term)
- Less than half of files reviewed at an on-site visit had missing or incomplete information
- Funds not drawn quarterly
- Grant not fully closed out by deadline
- Minimum habitability standards not met

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

- More than one-half of files reviewed during on-site compliance visit contained findings
- Files were unable to be reviewed during the site visit
- Files were not produced within 15 minute time frame
- Grantee will not schedule visit; 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

**Environmental Review**

Per 24 CFR 576.407(d), HUD-assisted projects, including ESG grantees and sub-grantees, are required to comply with the National Environmental Policy Act (NEPA) by conducting an environmental review to determine the potential environmental impacts of a project or, if applicable, by documenting its categorical exclusion or exemption from this requirement. Grantees using funds for project-based rental assistance are subject to a limited scope review. Grantees using ESG funds for essential services, shelter operations, HMIS, or tenant-based rental assistance only are considered exempt or categorically excluded. The level of environmental review increases for Grantees using ESG funds to lease office space to categorically excluded subject to Section 58.5. Grantees are required to document its compliance with environmental review as instructed by MHDC.

**Matching Funds**

Per 24 CFR 576.201, sub-grantees must match their total ESG grant award consisting of documented non-Mckinney resources. Matching funds must be used in accordance with all requirements that apply to ESG funds (e.g., documentation, participant eligibility, eligible costs). Match may include cash and/or non-cash contributions, including the value of any lease on a building, the actual value of professional
services, any salary paid to staff to carry out the program, and the value of the time and services contributed by volunteers to carry out the program. Any cash or non-cash contribution matched to ESG grant cannot have been used and will not be used to match any other Federal program’s funds nor any other grant. Failure to provide properly documented uses and sources of match at the end of the grant term will require repayment of all unmatched reimbursements.

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. Continuum of Care Attendance (Cl-107)
3. Match Certification (ESG-210) and supporting documentation

All complete and final close out information needs to be submitted electronically to Steve Whitson on or before 5:00 p.m. on May 1, 2019. Any funds that are not expended will be recaptured.

PROGRAM ADMINISTRATION

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 activities
- That the applicant has no appropriate subsequent housing options
- That the applicant lacks sufficient resources and support networks to obtain/retain housing
- Total household income is below 30 percent AMI (Homelessness Prevention only)
- That the applicant has not received more than 24 months of ESG within the past three years (Homelessness Prevention, Rapid Re-housing only)
- The minimum amount and types of assistance necessary (Homelessness Prevention, Rapid Re-housing only)

Evaluations must be conducted in accordance with the local coordinated entry process and the agency’s written standards (24 CFR 576.400) which should follow the Housing First model: https://www.usich.gov/resources/uploads/asset_library/Housing_First_Checklist_FINAL.pdf. 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 diverted.

Re-Evaluating Participation

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

- At least once every three months for Homelessness Prevention assistance
- At least once annually for Rapid Re-housing assistance

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

- Annual income household income is less than or equal to 30 percent of the AMI
- The program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance

Homeless Definitions

Individuals and families seeking assistance must be evaluated to determine their homeless eligibility for ESG. The following chart summarizes the homeless definitions; the complete homeless definitions can be found at 24 CFR 576.2.

<table>
<thead>
<tr>
<th>Literally Homeless (Category 1)</th>
<th>Individual or family who lacks a fixed, regular, and adequate nighttime residence:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• Has a primary nighttime residence that is a public or private place not meant for human habitation;</td>
</tr>
<tr>
<td></td>
<td>• 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</td>
</tr>
<tr>
<td></td>
<td>• Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Imminent Risk of Homelessness (Category 2)</th>
<th>Individual or family who will imminently lose their primary residence, provided that:</th>
</tr>
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<tbody>
<tr>
<td></td>
<td>• Residence will be lost within 14 days of the date of application for homeless assistance;</td>
</tr>
<tr>
<td></td>
<td>• No subsequent residence has been identified; and</td>
</tr>
<tr>
<td></td>
<td>• Lacks resources or support networks needed to obtain other permanent housing.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Homeless Under Other Federal Statutes (Category 3)</th>
<th>Unaccompanied youth under age 25, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• Are defined as homeless under other listed federal statutes;</td>
</tr>
<tr>
<td></td>
<td>• Have not had a lease, ownership, or occupancy agreement in permanent housing during the 60 days prior to the date of homeless assistance application;</td>
</tr>
<tr>
<td></td>
<td>• Have moved two or more times in the preceding 60 days; and</td>
</tr>
</tbody>
</table>
Can be expected to continue in such status for an extended period of time due to special needs or barriers.

Fleeing/Attempting to Flee Domestic Violence (Category 4)

Individual or family who:
- Is fleeing/attempting to flee domestic violence;
- Has no other residence; and
- Lacks resources or support networks needed to obtain other permanent housing.

The following chart summarizes who each funding component may serve:

<table>
<thead>
<tr>
<th>Component</th>
<th>Literally Homeless Individuals and Families</th>
<th>Homeless Individuals and Families at Risk of Homelessness</th>
</tr>
</thead>
<tbody>
<tr>
<td>Street Outreach</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Emergency Shelter</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Homelessness Prevention</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Rapid Re-Housing</td>
<td>X</td>
<td></td>
</tr>
</tbody>
</table>

Income

Individuals and families applying for ESG Homelessness Prevention must have incomes below 30 percent of AMI at initial evaluation. Individuals and families applying for ESG Rapid Re-housing do not need an income assessment at initial evaluation but must have incomes less than or equal to 30 percent of AMI at re-evaluation. Income requirements do not apply to program participants who are being served under Emergency Shelter or Street Outreach components. When determining the annual income of a household, the sub-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 Income Limits can be found on HUD’s website and are also posted on MHDC’s website at: [http://www.mhdc.com/ci/esg/fad/index2015.htm](http://www.mhdc.com/ci/esg/fad/index2015.htm).

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
- 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 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 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 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

Program Components and Eligible Activities

Street Outreach
ESG funds may be used for the costs of providing essential services to unsheltered homeless people (24 CFR Part 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.

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 Continuum of Care
- 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, medical professionals or other service providers during the provision of eligible street outreach services, including:

• Transporting unsheltered homeless individuals and families to emergency shelters or other service facilities
• Cost of a participant’s travel on public transit
• 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 ineligible.

Employee travel to attend CoC meetings or trainings are not eligible expenses.

**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.

**Emergency Shelter**
ESG funds may be used for the costs of operating an emergency shelter and providing essential services to homeless people in emergency shelters (24 CFR Part 576.102).

**Essential Services**

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

- Case management
- Childcare, education, employment, and life skills services
- Legal services
- Health, mental health, substance abuse services
- Transportation
- Services for special populations

**Shelter Operations**

Expenses to operate and maintain emergency shelters, including:

- Minor or routine maintenance
- Rent
- Security
- Fuel
- Insurance
- Utilities
- Food for shelter residents
- Furnishings
- Equipment
- Hotel or motel vouchers when no appropriate emergency shelter is available

**Minimum Shelter Standards**

Per 24 CFR part 576.403, emergency shelters must meet 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
Homelessness Prevention and Rapid Re-housing

*Homelessness Prevention*
To prevent households from becoming literally homeless (24 CFR Part 576.103). Participants must meet Category 2 or 4 of the homeless definitions and have an annual income below 30 percent of area median income, as determined by HUD, at initial evaluation. Households may only be assisted under this component as long as they the assistance is necessary to regain stability in permanent housing.

*Rapid Re-housing*
To move literally homeless individuals and families (24 CFR 576.104) quickly into permanent housing and achieve stability in that housing. Participants must meet Category 1 or 4 of the homeless definition which must be determined upon initial evaluation. Upon yearly reevaluation, the individual or family must have an annual income below 30 percent of the area median income, as determined by HUD.

*Eligible Activities*
Rental assistance, housing relocation and stabilization services are eligible activities under both Homelessness Prevention and Rapid Re-housing. The following are eligible costs under these eligible activities:

**Housing Relocation and Stabilization Services**
- **Financial Assistance**
  - Moving costs
  - Rent application fees
  - Last month’s rent
  - Security and utility deposits
  - Utility payments
- **Services**
  - Housing search and placement
  - Housing stability case management
  - Mediation
  - Legal services
  - Credit repair

**Rental Assistance**
- **Short-term**: up to three months
- **Medium-term**: four to 24 months
- **Rental Arrears**: One-time payment of up to six months rental arrears, including late fees on the arrears
**Housing Stability Case Management**

While providing Homelessness Prevention or Rapid Re-Housing Assistance, the case manager must:

- Attempt to meet with the participant at least once per month and document attempts to maintain contact and schedule meetings with clients, to assist the program participant in ensuring long-term housing stability (unless the grantee/sub-grantee is exempt from this requirement under the Violence Against Women Act (VAWA) or the Family Violence Prevention and Services Act which prohibit making its shelter or housing conditional on the participant’s acceptance of services); and

- Develop a plan to assist the program participant to retain permanent housing after the ESG 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 30 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:

- Fair Market Rent (FMR) limits (24 CFR Part 888)
- Rent Reasonableness (24 CFR 982.507)

Rent for unit assisted with ESG must not exceed the lesser of the Fair Market Rent or the rent reasonableness standard. Rent must be reasonable when compared to other units of similar location, type, size, and amenities within the community. Fair Market Rent (FMR) rent (including utilities) is at or below the HUD established FMR for the unit size in the area. Requirements do not apply for households not receiving ESG rental assistance.

**Lead-Based Paint and Minimum Habitability Standards**

All housing occupied by ESG program participants must be inspected for lead-based paint in accordance with 24 CFR 35. ESG funds must be used to help participants obtain or maintain housing that meets minimum habitability standards (24 CFR 576.403).

**Maximum Assistance**
The maximum period for which any program participant may receive ESG services must not exceed 24 months during any three-year period.

**Rental Assistance Agreements**

ESG grantees providing rental assistance must enter into a rental assistance agreement with the owner of the housing for which funds are being provided in accordance with 24 CFR 576.106(e). 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 rental assistance.

**HMIS**

HMIS, or HUD comparable database, participation is a requirement of receiving ESG funds, therefore costs associated with contributing data to the HMIS or comparable database are eligible for reimbursement (24 CFR 576.107) for agencies funded under the HMIS component. Additionally, costs associated with maintaining the database and training users are eligible costs to be reimbursed by the designated HMIS lead agency in each Continuum of Care. Activities must comply with HUD’s standards on participation, data collection and reporting, including compliance with HUD’s “2017 HMIS Data Dictionary” and “2017 HMIS Data Standard Manual” found at: https://www.hudexchange.info/resource/3824/hmis-data-dictionary/

**Eligible Activities for Grantees**

- **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
  - 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 Act

- Paying staff travel costs to conduct intake
- Paying participant fees charged by the HMIS lead agency

**Eligible Activities for HMIS Lead Agencies**

- 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

**Administration**

The Administration component is intended to support ESG grantees costs incurred to meet the grant requirements (24 CFR 576.108). ESG grantees may receive up to five percent of grant award for administrative costs if funded under the Administration component. Staff and overhead costs directly related to carrying out street outreach, emergency shelter, homelessness prevention, and rapid re-housing activities are not eligible to be reimbursed under Administration.

- **General Management, Oversight, and Coordination**
  - Administrative services performed under third party contracts or agreements, including general legal services, accounting services, monitoring services, and audit services
  - Other costs for goods and services required for administration of the program, including rental or purchase of equipment, insurance, utilities, office supplies, and rental and maintenance (but not purchase) of office space
  - Staff salaries, wages, and related costs of staff engaged in eligible program administration activities
  - Travel costs incurred for monitoring sub-grantees

- **Training on ESG Requirements**
  - Costs of providing training on ESG requirements
  - Costs of attending HUD-sponsored ESG trainings

- **Environmental Review**
  - Costs of carrying out environmental review responsibilities (defined at 24 CFR 576.407)

**Ineligible Activities**
Ineligible activities include, but are not limited to:

- Damage costs outside of the security deposit
- Mortgage payments
- Vehicle registration or fuel for program participant’s car
- Late fees accrued by the grantee
- Grantee employee salary advances
- Utility-only assistance where:
  - There are laws governing utility companies from shutting off power to households during winter months and that may require utility companies to offer payment plans for missed payments, and
  - There are other forms of utility assistance available to prevent shut-off, such as LIHEAP
- Renovations
- Vehicles
- Travel to CoC Meetings or trainings

Area-Wide Systems Coordination

Consultation with Continuums of Care

ESG grantees are required to attend at least 75 percent of all Continuum of Care (CoC) meetings in the Continua in which ESG funds are allocated. These meetings bring together many different agencies working toward the improvement of housing and ending homelessness in the state of Missouri. Grantees will be required to submit an attendance tracking sheet for meetings attended at the close out of the grant. It is the grantee’s responsibility to provide the CoC representative with an attendance tracking sheet provided by MHDC to complete for each meeting that is attended. MHDC acquires feedback from each CoC chair regarding the agency’s level of participation which may be assessed on future ESG applications for funding.

Coordination with Other Targeted Homeless Services

Sub-grantees must coordinate and integrate ESG 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)(c), for a full list of these programs.

Coordinated Entry System
All Missouri CoCs 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. Once developed, each ESG-funded non-victim services provider within the Continuum of Care’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 written standards. Victim services providers may choose not to use the Continuum of Care’s coordinated entry system.

Terminating Assistance

Per 24 CFR 576.402, if a program participant violates program requirements, their ESG benefits may be terminated in accordance with a formal process established by the sub-grantee that recognizes the rights of the individuals affected and allows for due process. The sub-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 sub-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 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.

https://www.usich.gov/resources/uploads/asset_library/Housing_First_Checklist_FINAL.pdf

Recordkeeping Requirements

Written Standards

Per 24 CFR 576.400, every ESG grantee must develop and implement written standards that include:

- Policies and procedures for evaluating households’ eligibility for ESG assistance
- Targeting and providing essential services related to street outreach
- Policies and procedures for admission, diversion, referral, and discharge by emergency shelters
- Policies and procedures for assessing, prioritizing, and reassessing households’ needs for essential services related to emergency shelter
• Policies and procedures for coordination among emergency shelter providers, essential services providers, homelessness prevention, and rapid re-housing assistance providers; other homeless assistance providers; and mainstream service and housing providers

• Policies and procedures for determining and prioritizing which eligible households will receive homelessness prevention and which households will receive rapid re-housing (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 re-housing 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

• 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 re-housing 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

• If the grantee’s CoC currently has a coordinated entry system, the grantee must describe how its agency will participate in the system

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 sub-grantee must maintain and follow written intake procedures to ensure compliance with homeless definitions and must include documentation required at intake to verify homeless status in order of HUD preference (1. Third-party observation, 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 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 he/she was 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:
  o Evidence that they lack financial resources to stay; or
  o A documented and verified oral statement; and
  o Certification that no subsequent residence has been identified; and
  o Self-certification or other written documentation that the household lacks financial resources and support necessary to obtain permanent housing.

**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 lacks other resources. Statement must be documented by a certification by intake worker or self-certification.

**Records to Maintain (SO, ES, HMIS, Administration)**

<table>
<thead>
<tr>
<th>Activity</th>
<th>Acceptable Forms of Documentation (both Cost Incurred and Proof of Payment are required)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Cost Incurred</td>
</tr>
<tr>
<td>Bills paid</td>
<td>• Invoice</td>
</tr>
<tr>
<td>Services performed</td>
<td>• Receipt</td>
</tr>
<tr>
<td>Materials purchased</td>
<td></td>
</tr>
<tr>
<td>Travel costs</td>
<td>• Travel request which includes date(s) of travel, from/to, purpose of travel, supporting documentation</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>Employee Compensation</td>
<td>• Timesheets</td>
</tr>
<tr>
<td></td>
<td>• Pay stub listing pay periods, employee listed, last four digits of SSN</td>
</tr>
<tr>
<td></td>
<td>• Copy of pay stub</td>
</tr>
<tr>
<td></td>
<td>• Bank statement with ESG payments highlighted</td>
</tr>
</tbody>
</table>
## Records to Maintain - Program Participants

<table>
<thead>
<tr>
<th>Record</th>
<th>Criteria</th>
<th>Applicable Components</th>
</tr>
</thead>
<tbody>
<tr>
<td>Homeless Status</td>
<td>• Documentation of individual/family's housing status</td>
<td>SO, ES, HP, RRH</td>
</tr>
<tr>
<td></td>
<td>• Form CI-104, CI-105</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Third party supporting documentation of homeless situation</td>
<td></td>
</tr>
<tr>
<td>Income Worksheet, as applicable</td>
<td>• Form ESG-201</td>
<td>HP, RRH</td>
</tr>
<tr>
<td></td>
<td>• Details household’s annual income eligibility</td>
<td></td>
</tr>
<tr>
<td>Supporting Documentation of Sources of Income</td>
<td>• Third-party verification of proof of gross annual income is needed for all members of the household age 18 and over</td>
<td>HP, RRH</td>
</tr>
<tr>
<td></td>
<td>• Pay stubs, SSI/SSDI award letter/printout, child support statement, EBT statement for TANF</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• If income source documents are unobtainable, ESG-202 Verification of Income form may be completed</td>
<td></td>
</tr>
<tr>
<td>Photo Identification</td>
<td>• Needed for all members of the household age 18 and over</td>
<td>HP, RRH</td>
</tr>
<tr>
<td></td>
<td>• 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.</td>
<td></td>
</tr>
<tr>
<td>Initial Consultation Documentation</td>
<td>• Agency Intake Documentation</td>
<td>SO, ES, HP, RRH</td>
</tr>
<tr>
<td>Case Management Documentation</td>
<td>• Assessing, arranging, coordinating, and monitoring delivery of services to facilitate housing stability</td>
<td>SO, ES, HP, RRH</td>
</tr>
<tr>
<td></td>
<td>• Notes must be dated and detail housing goals, plans, referrals</td>
<td></td>
</tr>
<tr>
<td>Proof of Need</td>
<td>• Documentation provided by participant to determine amounts/types of assistance needed for the household to gain stability in permanent housing</td>
<td>SO, ES, HP, RRH</td>
</tr>
<tr>
<td></td>
<td>• Utility bills, lease, arrears, eviction documentation</td>
<td></td>
</tr>
<tr>
<td>Proof of Payment for ESG reimbursement</td>
<td>• Canceled check/check register/bank statement showing payments cleared highlighted and/or returned checks log</td>
<td>HP, RRH</td>
</tr>
<tr>
<td>Rental Assistance Agreement</td>
<td>• Agreement between the landlord and ESG grantee</td>
<td>HP, RRH</td>
</tr>
<tr>
<td></td>
<td>• Applicable only to households receiving Rental Assistance</td>
<td></td>
</tr>
<tr>
<td>Lease</td>
<td>• Lease between program participant and landlord</td>
<td>HP, RRH</td>
</tr>
<tr>
<td></td>
<td>• Households assisted with Rental Assistance must have a written lease for the rental unit</td>
<td></td>
</tr>
<tr>
<td>Eligibility Certification</td>
<td>• Verifies client eligibility for ESG</td>
<td>SO, ES, HP, RRH</td>
</tr>
<tr>
<td></td>
<td>• Form ESG-203</td>
<td></td>
</tr>
<tr>
<td>Habitability Inspection</td>
<td>• Verifies ES and housing assisted with ESG meet minimum standards</td>
<td>ES, HP, RRH</td>
</tr>
<tr>
<td></td>
<td>• Form ESG-205 (ES or PH versions)</td>
<td></td>
</tr>
<tr>
<td>Lead-based Paint Inspection</td>
<td>• Form ESG-207, ESG-208</td>
<td>ES, HP, RRH</td>
</tr>
<tr>
<td>Rent Reasonableness and Fair Market Rent Certification</td>
<td>• Form ESG-206</td>
<td>HP, RRH</td>
</tr>
<tr>
<td></td>
<td>• Rent for unit assisted with ESG must not exceed the lesser of the Fair Market Rent or the rent reasonableness standard</td>
<td></td>
</tr>
<tr>
<td>Consent Form</td>
<td>• Form CI-108</td>
<td>SO, ES, HP, RRH</td>
</tr>
<tr>
<td></td>
<td>• Permits MHDC to review files</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Verifies safe, decent and sanitary housing</td>
<td></td>
</tr>
<tr>
<td>Social Security Identification</td>
<td>• Card/number needed for all members of the household</td>
<td>HP, RRH</td>
</tr>
<tr>
<td></td>
<td>• Social Security Card, printout from social security office</td>
<td></td>
</tr>
</tbody>
</table>
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, agencies 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. Grantee’s 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 Reauthorization Act of 2013 (“VAWA 2013”) 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 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 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 program.
Appendix A – Grant Documents

Before any funds can be released, all required initial grant documents must be completed and received by MHDC on or before 5:00 p.m. February 16, 2018. All documents must be submitted in hard-copy to MHDC’s Kansas City office. Grantees with multiple 2018 ESG grants must submit required documentation for each grant (i.e., agencies cannot submit one of each required document for multiple ESG 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 grantees:

1. Signature page – requires signature and notary
2. Rider B – requires signature
3. Exhibit 1: Workforce Eligibility Affidavit – check one box, requires signature and notary
4. Exhibit 2: Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion – requires signature
5. Exhibit 3: ESG 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, 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 before February 16, 2018 will result in recapture of the grant.

Attachment B: Federal Funding Accountability and Transparency Act
Description: The Attachment B requires information on 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.
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.

Site Contact Form (CI-102)
Description: This form ensures that MHDC has updated information for the upcoming grant year, including staff contact information, office location(s), hours of operation, and any other relevant information. Please note that the information provided will be used to conduct scheduled and unscheduled site visits.
Completion Instructions: Complete information pertaining to the grant indicated at top of form. If grant contact or hours of operation change, grantee is responsible for submitting an updated Site Contact Form or informing Steve Whitson via email.

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 grantee’s banking information will be updated for ALL MHDC accounts. If the banking information provided is for Emergency Solutions or one grant ONLY – it must be indicated on the direct deposit form.
Completion Instructions: Form must be signed with original signatures by authorized signatory.

Written Standards Certification (ESG-200) and Written Standards
Description: This form ensures that ESG grantees have created and implemented written standards 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 Written Standards.

Homeless Participation Certification
Description: Sub-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 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

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
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 email to steve.whitson@mhdc.com

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

Income Eligibility Worksheet (ESG-201)

Applicable Components: Homelessness Prevention, Rapid Re-housing

Due Date: Income eligibility must be certified at initial intake for Homelessness Prevention, and re-certified every 90 days thereafter. Income eligibility does not need to be certified for Rapid Re-housing participants until they have received ESG assistance for one year, and it should be re-certified every 90 days thereafter. At each income eligibility certification, proof of income must be current within 30 days.

Required: Yes

Submission / Retention: Retained in client file for every certification and re-certification

Description: This form is intended to be used to verify income eligibility for ESG Rapid Re-housing or Homelessness Prevention.

Completion Instructions:

1. **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 (i.e., 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 (ESG-202).

2. **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 AMI; therefore, it is very important that all members of the household are included in that section.

3. **30% of Area Median Income (AMI) for Household Size:** List the current 30 percent of area median income amount applicable to the county where the household is sheltered or housed. These income limits are provided by HUD at: [https://www.huduser.gov/portal/datasets/il.html](https://www.huduser.gov/portal/datasets/il.html).

4. **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, 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.

5. **Determination of Income Eligibility:** The service provider can then compare the “Total Annual Gross Income from all Sources” to the “30% AMI for Household Size” for the county of service to determine if household meets income eligibility requirements.

Income Verification Worksheet (ESG-202)

Applicable Components: Homelessness Prevention, Rapid Re-housing
Due Date: Income eligibility must be certified at initial intake for Homelessness Prevention, and re-certified every 90 days thereafter. Income eligibility does not need to be certified for Rapid Re-housing participants until they have received ESG assistance for one year, and it should be re-certified every 90 days thereafter. At each income eligibility certification, proof of income must be current within 30 days.

Required: Yes, if client has income but cannot provide document income

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

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, Rapid Re-housing

Due Date: Income eligibility must be certified at initial intake for Homelessness Prevention, and re-certified every 90 days thereafter. Income eligibility does not need to be certified for Rapid Re-housing participants until they have received ESG assistance for one year, and it should be re-certified every 90 days thereafter. At each income eligibility certification, proof of income must be current within 30 days.

Required: Yes – All members of household without income, 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, that do not have income.

Completion Instructions: All members of household without income, 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)

Applicable Components: Emergency Shelter, Homelessness Prevention, Rapid Re-housing

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

**Homeless or At-Risk Certification (CI-104), Staff Certification of Housing Status (CI-104), Self-Declaration of Housing Status (CI-105)**

- **Applicable Components:** Street Outreach, Emergency Shelter, Homeless Prevention, Rapid Re-housing
- **Required:** Yes, one of the three forms are required to document household’s homeless status
- **Description:** Grantee must verify the homeless status of all individuals and families seeking ESG 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:** Emergency Shelter, Homeless Prevention, Rapid Re-housing
- **Required:** Yes, for any shelter/housing assisted with ESG funds
- **Description:** Emergency Shelters should verify that all standards listed on ESG-205 Minimum Standards for Emergency Shelters checklist are met. Grantees using ESG funds for Homelessness Prevention or Rapid Re-housing must conduct inspections of housing units to ensure they meet standards detailed on ESG-205 Minimum Standards for Permanent Housing.

**Rent Reasonableness and Fair Market Rent Certification (ESG-206)**

- **Applicable Components:** Homeless Prevention- Rental Assistance, Rapid Re-housing- Rental Assistance
- **Required:** Yes, for ESG Rental Assistance payments
- **Description:** Rent for unit assisted with ESG must not exceed the lesser of the Fair Market Rent or the rent reasonableness standard. Rent must be reasonable when compared to other units of similar location, type, size, and amenities within the community. Fair Market Rent (FMR) rent (including utilities) is at or below the HUD established FMR for the unit size in the area. When determining the utility allowance for housing that does not include utilities in the rent amount, HUD’s Utility Allowance Schedule Model can be utilized.

**Lead Screening Worksheet (ESG-207)**

- **Applicable Components:** Homeless Prevention, Rapid Re-housing
- **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’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:** Emergency Shelter, Homeless Prevention, Rapid Re-housing
Required: Yes, if visual assessment reveals problems with paint surfaces. ESG 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 (ESG-209)
Applicable Components: Homeless Prevention, Rapid Re-housing
Required: Yes
Description: Recertification form documents an individual or family’s eligibility factors for continued ESG assistance and tracks the assistance provided to date. Applicants for Homeless Prevention must be evaluated for eligibility at initial intake and every 90 days. Rapid Re-housing program participants must be evaluated every 90 days after one year of ESG assistance.