



California Department of Housing and Community Development

ESG - Regular
2024 ESG Allocation Application

For any questions related to this program solicitation please contact ESGNOFA@hcd.ca.gov

[Create New Application](#) [Back to Solicitation](#)

Application Submissions

Profile ▾

[Save Changes](#)

Applicant Information

Tell us about you.

Application Contact Person

First name *

Christopher

Last name *

Salazar

Phone Number *

9095010612

Title

Housing Administrative Manager

Organization/Company *

Office of Homeless Services

Organization/Company Website

Office of Homeless Services

Address *

560 E Hospitality Ln

City *

San Bernardino

State *

California

Zip Code *

92408

Organization Information

Tell us about your organization.

Organization Name *

Office of Homeless Services

Employer Identification Number (EIN)

95-6002748

DUNS

809428316

Authorized Representative *

Marcus Dillard

Authorized Representative Title *

Chief of Homeless Services

Authorized Representative Email *

marcus.dillard@hss.sbcounty.gov

Authorized Representative Phone Number *

909-501-0610

Business/Finance Representative

Office of Homeless Services

Organization Address

Address *

560 E Hospitality Ln

Address 2

SUITE 200

City *

San Bernardino

State *

California

County

San Bernardino County

Congressional District/Region

Zip *

92408

Phone *

909-501-0612

Business/Finance Contact (if required)

Name

Lynne Abiva

Title

Budget Officer

Email

lynne.abiva@hss.sbcounty.gov

Phone

909-501-0610

Application Submissions

Applications ▾

Save Draft

Mark Complete

Close

When you are ready to submit this step, please click the blue "Save" button at the bottom of the page.

- You can save this form as a draft at any time by clicking "Save Draft" at the bottom of the page.
- When you have completed all required items, please click the "Mark Complete" button at the bottom of the page.

NOTE: When you have completed all required steps, be sure to click "Submit" on the next page.

2024 ESG Application

Application/Project Title *

2024 ESG Application

Give your application a unique name.

Check the box below if the applicant was impacted by the Los Angeles Region fires and is submitting after the March 28, 2025 application deadline. Impacted applicants have until September 28, 2025 to submit an application. Late submittal of an application does not result in a later expenditure deadline for 2024 funds. All 2024 funds must be fully expended by September 26, 2026.

Yes, I was impacted by the Los Angeles Region fires, and I am submitting my application after the application deadline.

This application is subject to the Emergency Solutions Grants (ESG) Program federal regulations established by the U.S. Department of Housing and Urban Development (HUD), any State Guidelines established by the Department of Housing and Community Development (HCD), and the 2024 ESG Notice of Funding Availability (NOFA).

For information about the Federal regulations that govern ESG funding please follow these links:

[24 CFR 576 Emergency Solutions Grant](#)

[2024 ESG NOFA](#)

[ESG Guidelines](#)

[ESG Program Website](#)

Please make sure to use the appropriate resolution template for your application.

[2024 ESG 3-Year Resolution Template](#)

[2024 ESG 1-Year Resolution Template](#)

Application Submittal

The Department will ONLY be accepting applications through the eCivis Grants Management System.

Applications and required documentation must be received by HCD via eCivis no later than 5:00 p.m. Pacific Daylight Time on Friday, March 28, 2025; applications submitted prior to this deadline are highly encouraged. Any applications received after this time will not be accepted.

All applications will be accepted through an Over-The-Counter (OTC) process. The Department will continuously evaluate, accept, and award applications until funds are exhausted.

All application forms and necessary attachments can be found in the "Files" tab in the following page: [2024 ESG Solicitation](#)

Application Threshold Requirements

As a reminder, all applications submitted MUST meet HCD's threshold requirements which includes submitting ALL information and documentation requested in this application, as well as the information noted in the [2024 ESG NOFA](#).

These items include but are not limited to the following items in the user portal:

- Profile
- Budget
- Goals

Applicants must include the applicable documentation for their organization type and specific application, including:

- Government Agency Taxpayer ID Form (TIN) as required for all government agencies (including cities and counties)
- Form 204 as required for all non profits and non-governmental organizations

- Active UEI (formerly DUNS) and active registration on [SAM.gov](#)
- Single Audit Compliance
- Authorizing Resolution ((MUST use an HCD Approved Template AND must be approved by the Applicant's governing board - HCD Approved Templates can be found on the Application Home Page.)
- Emergency Shelter (ES) Requirements as applicable
- Street Outreach (SO) Requirements as applicable
- Rapid Re-Housing (RR) Requirements as applicable
- Homelessness Prevention (HP) Requirements as applicable
- Continuum of Care (CoC) Recommendation Form (for non profits and community agencies applying on behalf of the CoC)
- Indirect Costs Certification (if applicable, please also upload evidence of a Negotiated Indirect Cost Rate approved by a cognizant federal agency or a Cost Allocation Plan)
- Match Certification
- Legislative Information
- Racial Equity
- General Certifications

You must use the certifications that are in the application, please note that if you use a prior year's certification, this will result in an automatic disqualification of your application and denial of funds to your CoC area.

A. Applicants (Applicant) must follow instructions in both the NOFA and this online application. Failure to follow instructions will result in disqualification.

B. The ESG application and all required attachments must be submitted to HCD through the eCivis Portal located at <https://portal.ecivis.com/#/login>. Applications must include all required information to be submitted.

C. The application must be complete and received by the deadline.

D. The Applicant is eligible as described in Section II (A) of the NOFA.

E. Proposed Activities are eligible pursuant to Section II (B) of the NOFA.

F. Pursuant to 24 CFR 576.408, Applicants must have adequate and documented site control for any application proposing an ES Activity.

G. The application must include a completed Authorizing Resolution (AR) on the HCD template and approved by the Applicant's governing board. The AR designates a person or persons responsible for, and authorized to execute, all documents related to the application of ESG funds, ESG award, and submittal of funds requests.

Please see the instructions for completing the required HCD AR template on the ESG website. Failure to use the required AR template provided by HCD will result in automatic disqualification. If a governing body must prepare a separate resolution concurrently that conforms to its local standard, it may do so in addition to preparing the AR form provided by HCD. In the event the Applicant's AR is not submitted by the application due date, then the entire application will be deemed untimely and thus automatically rejected in its entirety.

H. All Applicants must demonstrate to the satisfaction of the Department that it is following the financial management requirements of 2 CFR Part 200. If applicable, the Applicant must provide the Department with its most recent single audit (as submitted to the State Controller's Office), as well as the most recent year's Form 990. If the Applicant has any open single audit findings and does not have a plan or an agreement to remediate those findings, the Applicant will be deemed ineligible for funding through the State ESG program until the findings are resolved or a remediation plan or agreement is established.

I. Pursuant to 24 CFR Part 576.201 Applicants must have identified dollar-for-dollar match for the federal ESG funding with funds from other public or private sources.

An application may be deemed ineligible if the application does not meet the threshold requirements, if the application is incomplete, or if HCD cannot determine compliance with the threshold requirements.

Application Steps

Below is a list of all sections and steps within the application. Within each step, there may be multiple documents/attachments that will need to be submitted. This list is not all inclusive, and meant to give a broad overview of the application and data, therefore you will need to review your entire application as well as the 2024 ESG NOFA.

Section 1 - Profile

Section 2 - Application Section:

Step 1 - 2024 ESG Application:

- Government Agency Taxpayer ID Form (TIN)
- JPA Documents (If Applicable)
- Authorizing Resolution on HCD approved templates
 - 2024 ESG 1-Year Resolution Template
 - 2024 ESG 3-Year Resolution Template
- Active registration on Sam.gov
- Single Audit
- Street Outreach Written Policies and Procedures (If requesting SO)
- Emergency Shelter Written Policies and Procedures (If requesting ES)
- Rapid Re-Housing Written Policies and Procedures (if requesting RRH)
- Homelessness Prevention Written Policies and Procedures (If requesting HP)

Step 2 - Environmental Review Requirements

Step 3 - Legislative Contact Information

Step 4 - Racial Equity

Step 5 - Match Exemption Application (OPTIONAL)

Section 3 - Budget & Goals:

Step 1 - Create Budget

Step 2 - Write Budget Narrative

Step 3 - Complete Goals

Section 4 - Certifications & Threshold Recognition (forms are on the Files tab of the Solicitation):

1. CoC Recommendation Form
CoC Recommendation Form must be submitted if the applicant is other than the CoC. The CoC can recommend up to two subrecipients to apply directly to HCD. CoC Recommendation Form MUST be signed by the Authorized Representative of the CoC and on CoC letterhead.
2. Indirect Cost Certification
MUST be signed by the Authorized Representative (as listed in your resolution)
If your agency has an approved indirect cost rate above 15%, please upload a copy of your indirect cost rate agreement issued from a cognizant federal agency.
If your agency is claiming indirect costs, please upload the indirect cost budget worksheet.
3. Match Certification
MUST be signed by the Authorized Representative (as listed in your resolution)
4. General Certification
5. Threshold Requirements Recognition & questions to verify you are not missing anything.

All HCD funding decisions are final.

Application Information

Applicant Name *

Office of Homeless Services

Organization Name *

San Bernardino County Office of Homeless Services

Required: Select your CoC from the below list *

609 - San Bernardino City and County

Enter your Allocation amount as noted in Appendix A (2024 ESG NOFA) - OR - Application amount, if requesting less than the amount noted in Appendix A :

\$ 1,248,208

Select your Government/Agency/Organization Type *

City & County

Upload any Interagency Agreement (If applicable to this grant application) here

+ Select a file

Governing Board Resolution

Upload Resolution here *

+ Select a file

Upload Designee Letter (if applicable)

+ Select a file

RESOLUTION NO. 2025- _____

**A RESOLUTION OF THE BOARD OF SUPERVISORS OF SAN BERNARDINO COUNTY,
STATE OF CALIFORNIA, APPROVING AN APPLICATION FOR FUNDING AND THE
EXECUTION OF A GRANT AGREEMENT AND ANY AMENDMENTS THERETO FROM THE
2024 - 2027 FUNDING YEARS OF THE STATE ESG PROGRAM**

On Tuesday, March 25, 2025, on motion of Supervisor _____, duly seconded by Supervisor _____ and carried, the following resolution is adopted by the Board of Supervisors of San Bernardino County, State of California.

A. WHEREAS the State of California (the "State"), Department of Housing and Community Development ("Department") issued a Notice of Funding Availability ("NOFA") dated December 31, 2024, under the Emergency Solutions Grants ("ESG") Program ("Program" or "ESG Program"); and

B. WHEREAS San Bernardino County ("Applicant") is an approved Subrecipient or Contractor.

NOW, THEREFORE, THE BOARD OF SUPERVISORS OF SAN BERNARDINO COUNTY DOES RESOLVE AS FOLLOWS:

SECTION 1. Applicant is an approved Subrecipient or Contractor by their Continuum of Care and is hereby authorized and directed to receive an ESG Program grant, in an amount not to exceed \$2,496,416 in accordance with all applicable rules and laws.

SECTION 2. Applicant hereby affirms that if ESG Program funds remain available for allocation after the deadline for submitting an application, and if the Department advises Applicant that Applicant is eligible for an additional allocation from these remaining funds, Applicant is hereby authorized and directed to accept this additional allocation of funds ("Additional ESG Allocation") up to the amount authorized by Department but not to exceed \$2,496,416.

SECTION 3. Applicant hereby affirms that the ESG Program funds and allocation amounts published under the NOFA represent three consecutive Annual Funding Cycles; the second and third Annual Funding Cycles are estimated amounts only, and actual amounts, if any, are contingent upon the Department receiving an annual grant agreement from the United States Department of Housing and Urban Development (HUD).

SECTION 4. The Department may approve funding allocations for the ESG Program, subject to the terms and conditions of the NOFA, Program regulations, Program guidelines, and the Standard Agreement. The Applicant acknowledges compliance with all state and federal public participation requirements in the development of its applications.

SECTION 5. If Applicant receives a grant of ESG Program funds from the Department pursuant to the above referenced ESG Program NOFA, it represents and certifies that it will use all such funds in a manner consistent and in compliance with all applicable state and federal statutes, rules, regulations, laws, and guidelines, including without limitation all rules and laws regarding the ESG Program, all as may be subsequently amended from time to time, as well as any and all other contracts Applicant may have with the Department.

SECTION 6. The Applicant hereby authorizes and directs the Chief Executive Officer, the Assistant Executive Officer or the Chief of Homeless Services, to execute and deliver all applications and act on the Applicant's behalf in all matters pertaining to all such applications.

SECTION 7. If an application is approved, the Chief Executive Officer, the Assistant Executive Officer, or the Chief of Homeless Services, is authorized and directed to act on behalf of Applicant in connection with the ESG Allocation Award and any Additional ESG Allocation enter into, execute and deliver the grant agreement (*i.e.*, Standard Agreement) and any and all subsequent amendments thereto with the State of California for the purposes of the grant.

SECTION 8. If an application is approved, the Chief Executive Officer, the Assistant Executive Officer, or the Chief of Homeless Services, is authorized to sign and submit Funds Requests and all required reporting forms and other documentation as may be required by the State of California from time to time in connection with the grant.

PASSED AND ADOPTED at a regular meeting of the Board of Supervisors of San Bernardino County, State of California, held on March 25, 2025, by the following vote:

AYES: SUPERVISORS:

NOES: SUPERVISORS:

ABSENT: SUPERVISORS:

ABSTENTIONS: SUPERVISORS:

STATE OF CALIFORNIA)
)
SAN BERNARDINO COUNTY) ss.

I, LYNNA MONELL, Clerk of the Board of Supervisors of San Bernardino County, State of California, hereby certify the foregoing to be a full, true and correct copy of the record of the action taken by the Board of Supervisors, by vote of the members present, as the same appears in the Official Minutes of said Board at its meeting of March 25, 2025.

LYNNA MONELL
Clerk of the Board of Supervisors

By _____
Deputy

I, Lynna Monell, am the Clerk of the Board of Supervisors of San Bernardino County, State of California, a political subdivision of the State of California, and as such, am familiar with the facts herein and do hereby certify as follows:

1. That San Bernardino County is a political subdivision of the State of California, duly formed, validly existing and duly qualified to transact business in the State of California, with full power and authority to enter into agreements with the Department of Housing and Community Development.

LYNNA MONELL
Clerk of the Board of Supervisors



Dated: _____

UEI (formerly DUNS) and SAM.gov Registration

Evidence of an active UEI/DUNS number with the correct Applicant address is required as part of the application.

Applicants must include a copy of the search result in the application and may be obtained by searching the [System of Award Management](#).

Upload proof of active registration on SAM.gov here *

Single Audit and Form 990 Requirements

An applicant that fails to disclose any findings from their most recent program-specific or single audit will be disqualified without exception or an appeal. If an applicant has any "open" single audit findings and does not have a plan or an agreement to remediate those findings, they will be deemed ineligible for funding through the State ESG program until the findings are resolved or a remediation plan or agreement is established. All Applicants must demonstrate to the satisfaction of the Department that it is in compliance with the financial management requirements of 2 CFR § 200. The applicant must provide the Department with its most recent single audit (as submitted to the State Controller's Office), if applicable. If the applicant is a JPA and also listed as a nonprofit, they are required to submit their most recent form 990 along with their single audit. If the applicant has any open single audit findings and does not have a plan or an agreement to remediate those findings, the Applicant will be deemed ineligible for funding through the State ESG program until the findings are resolved or a remediation plan or agreement is established. Any and all single audit findings are included in this evaluation. This requirement is not limited to federal funds administered by the Department. If an applicant is not subject to single audit requirements, the Applicant is not required to submit an audit.

COUNTY OF SAN BERNARDINO Active Registration Entity Information

Unique Entity ID NN3JV1EM6HMS	CAGE/NCAGE 50EL1	Expiration Date Oct 26, 2025
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Physical Address 385 N Arrowhead AVE San Bernardino, California 92415-0103, United States	Mailing Address 560 E. Hospitality Lane STE 200 San Bernardino, California 92415-0044, United States
---	--

Purpose of Registration
All Awards

Version

BUSINESS INFORMATION

Doing Business As (blank)	URL (blank)	Registration Dates Activation Date Oct 28, 2024 Submission Date Oct 24, 2024 Initial Registration Date Mar 4, 2008
Division Name County Of San Bernardino Office Of Homeless Services	Division Number (blank)	
Congressional District California 33	State/Country of Incorporation (blank), (blank)	
Owner	CAGE	

<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Owner</th> <th>CAGE</th> <th>Legal Business Name</th> </tr> </thead> <tbody> <tr> <td>Immediate Owner</td> <td>(blank)</td> <td>(blank)</td> </tr> <tr> <td>Highest Level Owner</td> <td>(blank)</td> <td>(blank)</td> </tr> </tbody> </table>	Owner	CAGE	Legal Business Name	Immediate Owner	(blank)	(blank)	Highest Level Owner	(blank)	(blank)	Entity Dates Entity Start Date Sep 25, 2007 Fiscal Year End Close Date Jun 30
Owner	CAGE	Legal Business Name								
Immediate Owner	(blank)	(blank)								
Highest Level Owner	(blank)	(blank)								

Executive Compensation

Registrants in the System for Award Management (SAM) respond to the Executive Compensation questions in accordance with Section 6202 of P.L. 110-252, amending the Federal Funding Accountability and Transparency Act (P.L. 109-282). This information is not displayed in SAM. It is sent to USA spending.gov for display in association with an eligible award. Maintaining an active registration in SAM demonstrates the registrant responded to the questions.

In your business or organization's preceding completed fiscal year, did your business or organization (the legal entity to which this specific SAM record, represented by a Unique Entity ID, belongs) receive both of the following: 1. 80 percent or more of your annual gross revenues in U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements and 2. \$25,000,000 or more in annual gross revenues from U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements?

No

Does the public have access to information about the compensation of the senior executives in your business or organization (the legal entity to which this specific SAM record, represented by a Unique Entity ID, belongs) through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78b(a), 78b(d)) or section 6104 of the Internal Revenue Code of 1986?

Not Selected

SAM SEARCH AUTHORIZATION

I authorize my entity's non-sensitive information to be displayed in SAM public search results:

No

Applicants that fail to disclose findings on their most recent single audit will be disqualified without exception or appeal. The Single Audit requirement is triggered for agencies that spend \$1,000,000 or more of federal funds. Single Audit: A non-Federal entity that expends \$1,000,000 or more during the non-Federal entity's fiscal year in Federal awards must have a single audit conducted in accordance with 2 CFR § 200.514.

Has your Agency spent at least \$1,000,000 of federal funds in any fiscal year over the past ten years? *

Street Outreach (SO) Requirements

All Applicants that are awarded funding for the Street Outreach (SO) activity are now required to develop and implement written policies and procedures (P&Ps) to HCD at application. P&Ps must fully detail the Applicants ESG-SO operations.

At minimum, they must include the following content pieces:

- Written Standards;
- Coverage Area;
- Coordinated Entry Integration;
- Participant Eligibility;
- Suite of Services;
- Staffing Patterns;
- Housing Problem-solving;
 - Diversion

- Rapid exit
- Other Requirements;
- General Operations.

[Street Outreach Policy](#) has been developed and is available to all ESG CoCs and community members for guidance on operating their SO programs.

Are you applying for SO funding? *

Emergency Shelter (ES) Requirements

All Applicants that are awarded funding for the Emergency Shelter (ES) activity are now required to develop and implement written policies and procedures (P&Ps) to HCD at application. P&Ps must fully detail the Applicants ESG-ES operations. At minimum, they must include the following content pieces:

- Written Standards;
- Coordinated Entry Integration;
- Participant Eligibility;
- Suite of Services;
- Staffing Patterns;
- Housing Problem-solving;
 - Diversion
 - Rapid exit

- General Operations;
- Other Requirements; and
- Approval.

[Emergency Shelter Policy](#) has been developed and is available to all ESG CoCs and Stakeholders for guidance on operating their ES programs.

Are you applying for ES funding? *

Do you have written P&Ps in place for ES that meet the requirements listed above? *

Upload your written ES P&Ps here *

Rapid Re-Housing (RRH) Requirements

All Applicants that are awarded funding for the Rapid Re-Housing (RRH) activity are now required to develop and implement written policies and procedures (P&Ps) to HCD at application. P&Ps must fully detail the Applicants ESG-RRH operations.

At minimum, they must include the following content pieces:

- Participant Triage
- Coordinated Entry Integration
- Participant Eligibility
- Suite of Services
- Staffing Patterns
- Termination and Appeals
- Other Requirements
- General Operation
- Approval

[Rapid Re-Housing Policy](#) has been developed and is available to all ESG CoCs and community members for guidance on operating their RRH programs.

Are you applying for RRH funding? *

Do you have written P&Ps in place for RRH that meet the requirements listed above? *

Have your RRH P&Ps been approved by HCD-ESG Staff? *

Upload your written RRH P&Ps here *

Homelessness Prevention (HP) Requirements

All Applicants that are awarded funding for the Homelessness Prevention (HP) activity are now required to develop and implement written policies and procedures (P&Ps) to HCD at application. P&Ps must fully detail the Applicants ESG-HP operations.

At minimum, they must include the following content pieces:

- Participant Triage
- Coordinated Entry Integration
- Participant Eligibility
- Suite of Services
- Staffing Patterns
- Termination and Appeals
- Other Requirements
- General Operation

- Approval

Homelessness Prevention Policy has been developed and is available to all ESG CoCs and community members for guidance on operating their HP programs.

Are you applying for HP funding? *

No

Have your HP P&Ps been approved by HCD-ESG Staff? *

No

Upload your written HP P&Ps here *

+ Select a file

OHS ESG Policies and Procedures 2-21-2025.pdf



Reminders

Name of Organization ("Applicant") must be the same as stated in the Board Resolution and Government Agency Taxpayer ID Form (TIN). If these names do NOT match exactly then this can and will delay the processing of your application.

Budget and Goals Reminder If you have not already done so please click "Save Draft" and access the Application Budget and Goals tables on the home page. For detailed instructions please see the HCD External User Guide Reference

Have you completed your Budget? *

Yes

Have you completed your Goals? *

Yes

Additional File Upload if needed

+ Select a file



Additional File Upload if needed

+ Select a file



Additional File Upload if needed

+ Select a file



Additional File Upload if needed

+ Select a file



Budget Worksheet

View Budget Worksheet

<https://portal.ecivis.com/#/peerBudget/2D7A57FE-E0EB-47B1-B5CA-73FF614663B4>

Application Goals

View Application Goals

<https://portal.ecivis.com/#/peerGoals/F7D52CA2-6C7D-4747-90FA-4E030698640A>

Save Draft

Mark Complete

Close

Application Budget for San Bernardino County Office of Homeless Services

Program: 2024 ESG Allocation Application
Project name: 2024 ESG Application

Return to Application

Budget Stage: Pre-Award

Actions



Budget Summary

\$1,248,208.00	Total Direct Costs	\$1,248,208.00	Match / Cost Share
\$0.00	Total Indirect Costs	\$0.00	Program Income
\$1,248,208.00	Total Amount (Direct + Indirect)		

Budget Settings

Budget Items

	Ext Cost	Direct Cost	Ind Cost	Cost Share
1. Street Outreach	\$0.00	\$0.00	\$0.00	\$0.00

2. Emergency Shelter

	Ext Cost	Direct Cost	Ind Cost	Cost Share
Emergency Shelter Totals:	\$0.00	\$611,621.92	\$0.00	\$0.00

Title	Description	Units	Unit Cost	Extended Cost	Cost	GL Code	Cost Share	Item Type
Emergency Shelter Costs	Emergency Shelter Costs	2.00	\$0.00	\$0.00	\$611,621.92		<input type="checkbox"/>	Direct Cost
Indirect Costs	Emergency Shelter Indirect Costs	0.00	\$0.00	\$0.00	\$0.00		<input type="checkbox"/>	Indirect Cost

[Add Row](#)

	Ext Cost	Direct Cost	Ind Cost	Cost Share
3. Homelessness Prevention	\$0.00	\$0.00	\$0.00	\$0.00

4. Rapid Re-Housing

	Ext Cost	Direct Cost	Ind Cost	Cost Share
Rapid Re-Housing Totals:	\$0.00	\$499,283.20	\$0.00	\$0.00

Title	Description	Units	Unit Cost	Extended Cost	Cost	GL Code	Cost Share	Item Type
Rapid Re-Housing Costs	Rapid Re-Housing Costs	60.00	\$8,321.39	\$0.00	\$499,283.20		<input type="checkbox"/>	Direct Cost
Indirect Costs	Rapid Re-Housing Indirect Costs	0.00	\$0.00	\$0.00	\$0.00		<input type="checkbox"/>	Indirect Cost

[Add Row](#)

5. HMIS

	Ext Cost	Direct Cost	Ind Cost	Cost Share
HMIS Totals:	\$0.00	\$124,820.80	\$0.00	\$0.00

Title	Description	Units	Unit Cost	Extended Cost	Cost	GL Code	Cost Share	Item Type
HMIS Costs	HMIS Costs	1.00	\$0.00	\$0.00	\$124,820.80		<input type="checkbox"/>	Direct Cost
Indirect Costs	HMIS Indirect Costs	0.00	\$0.00	\$0.00	\$0.00		<input type="checkbox"/>	Indirect Cost

[Add Row](#)

6. Administration

				Ext Cost	Direct Cost	Ind Cost	Cost Share	
Administration Totals:				\$0.00	\$12,482.08	\$0.00	\$0.00	
Title	Description	Units	Unit Cost	Extended Cost	Cost	GL Code	Cost Share	Item Type
Administration Costs	Administration Costs	1.00	\$0.00	\$0.00	\$12,482.08		<input type="checkbox"/>	Direct Cost
Indirect Costs	Administration Indirect Costs	0.00	\$0.00	\$0.00	\$0.00		<input type="checkbox"/>	Indirect Cost

[Add Row](#)

Other

	Ext Cost	Direct Cost	Ind Cost	Cost Share
1. Other	\$0.00	\$0.00	\$0.00	\$0.00

Program Income

	Income
1. Program Income	\$0.00

Budget Narrative

Enter your budget narrative below.

The proposed three-year ESG budget is designed to address the immediate needs of our community's homeless population while also laying the foundation for long-term housing stability. A significant portion of the budget, \$611,621.92, will be allocated toward the establishment of both a cold weather and a warm weather emergency shelter. These shelters are urgently needed in our community to ensure that individuals experiencing homelessness have access to safe, secure, and dignified temporary housing during extreme weather conditions. The cold weather shelter will operate during the colder months, providing warmth and safety, while the warm weather shelter will serve as a vital resource during the summer, protecting individuals from heat-related risks and ensuring their well-being year-round. Both shelters can provide the necessary services to meet the growing demand in our area.

In addition, \$499,283.20 will be allocated to our Rapid Rehousing program, a key initiative aimed at helping individuals transitioning out of the emergency shelters secure permanent housing. This program will provide rental assistance, housing search support, and case management services to help individuals and families move quickly from homelessness into stable, long-term housing. By focusing on rapid rehousing, the program will reduce the time spent in shelters and help individuals regain self-sufficiency by providing them with the resources needed to secure housing and maintain it. The Rapid Rehousing program will also connect participants with community services that support their overall well-being, including employment support, mental health services, and substance abuse treatment.

A critical investment in technology, \$124,820.80 will be used to support our Homeless Management Information System (HMIS). This system plays an essential role in tracking client data, program performance, and housing outcomes, ensuring that we can make data-driven decisions and provide efficient services. The HMIS system allows for seamless coordination among service providers and ensures that resources are allocated effectively. This investment will cover the costs of system upgrades, staff training, and ongoing technical support, ensuring that the system remains efficient and secure throughout the program's duration.

Lastly, \$12,482.08 will be allocated for administrative costs, which will cover the essential functions needed to manage and oversee the implementation of these programs. These costs include staffing, reporting, compliance monitoring, and general program oversight to ensure the effective and accountable use of ESG funding. Importantly, there will be no indirect costs tied to this funding, which allows us to direct every dollar to the core services and programs that will have a direct impact on the lives of those experiencing homelessness in our community.

This comprehensive and strategically planned budget will allow us to provide immediate relief to individuals in crisis, while also offering a sustainable path to long-term housing stability.



4935 characters remaining

Application Goals for San Bernardino County Office of Homeless Services

Program: 2024 ESG Allocation Application
Project name: 2024 ESG Application

Fill out all goal categories for each component you are applying for.

Goal / Objective	Target Units	Direct Cost Expenditure	Matching Expenditure	Program Income Expenditure
Age for All Activities	460.00	\$ 0.00	\$ 0.00	\$ 0.00
Subgoals				
18-24	50.00	\$ 0.00	\$ 0.00	\$ 0.00
25 and over	360.00	\$ 0.00	\$ 0.00	\$ 0.00
Don't Know/Refused/Other	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Missing Information	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Under 18	50.00	\$ 0.00	\$ 0.00	\$ 0.00
ES - # of Beds Available (All Beds)	0.00	\$ 0.00	\$ 0.00	\$ 0.00
ES - # of Beds Provided	400.00	\$ 611,621.92	\$ 611,621.92	\$ 0.00
ES - # of Persons in Households Served	400.00	\$ 611,621.92	\$ 0.00	\$ 0.00

Subgoals				
Adults	350.00	\$ 525,000.00	\$ 0.00	\$ 0.00
Children	50.00	\$ 86,621.92	\$ 0.00	\$ 0.00
Don't Know/Refused/Other	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Missing Information	0.00	\$ 0.00	\$ 0.00	\$ 0.00
ES - # of Persons in Households Served - "Special Populations"	360.00	\$ 0.00	\$ 0.00	\$ 0.00
Subgoals				
Chronic Substance Abuse	50.00	\$ 0.00	\$ 0.00	\$ 0.00
Chronically Homeless	250.00	\$ 0.00	\$ 0.00	\$ 0.00
Elderly	50.00	\$ 0.00	\$ 0.00	\$ 0.00
HIV/AIDS	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Other Disability	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Severely Mentally Ill	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Veterans	10.00	\$ 0.00	\$ 0.00	\$ 0.00
Victims of Domestic Violence	0.00	\$ 0.00	\$ 0.00	\$ 0.00

Gender for All Activities	410.00	\$ 0.00	\$ 0.00	\$ 0.00
Subgoals				
Don't Know/Refused/Other	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Female	90.00	\$ 0.00	\$ 0.00	\$ 0.00
Male	310.00	\$ 0.00	\$ 0.00	\$ 0.00
Missing Information	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Transgender	10.00	\$ 0.00	\$ 0.00	\$ 0.00

HP - # of Persons in Households Served	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Subgoals				
Adults	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Children	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Don't Know/Refused/Other	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Missing Information	0.00	\$ 0.00	\$ 0.00	\$ 0.00
HP - # of Persons in Households Served - "Special Populations"	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Subgoals				
Chronic Substance Abuse	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Chronically Homeless	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Elderly	0.00	\$ 0.00	\$ 0.00	\$ 0.00
HIV/AIDS	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Other Disability	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Severely Mentally Ill	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Veterans	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Victims of Domestic Violence	0.00	\$ 0.00	\$ 0.00	\$ 0.00

RRH - # of Persons in Households Served	70.00	\$ 499,283.20	\$ 499,283.20	\$ 0.00
Subgoals				
Adults	60.00	\$ 499,283.20	\$ 499,283.20	\$ 0.00
Children	10.00	\$ 0.00	\$ 0.00	\$ 0.00
Don't Know/Refused/Other	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Missing Information	0.00	\$ 0.00	\$ 0.00	\$ 0.00
RRH - # of Persons in Households Served - "Special Populations"	60.00	\$ 0.00	\$ 0.00	\$ 0.00
Subgoals				
Chronic Substance Abuse	10.00	\$ 0.00	\$ 0.00	\$ 0.00
Chronically Homeless	30.00	\$ 0.00	\$ 0.00	\$ 0.00
Elderly	10.00	\$ 0.00	\$ 0.00	\$ 0.00
HIV/AIDS	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Other Disability	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Severely Mentally Ill	5.00	\$ 0.00	\$ 0.00	\$ 0.00
Veterans	5.00	\$ 0.00	\$ 0.00	\$ 0.00
Victims of Domestic Violence	0.00	\$ 0.00	\$ 0.00	\$ 0.00

SO - # of Persons in Households Served	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Subgoals				
Adults	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Children	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Don't Know/Refused/Other	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Missing Information	0.00	\$ 0.00	\$ 0.00	\$ 0.00
SO - # of Persons in Households Served - "Special Populations"	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Subgoals				
Chronic Substance Abuse	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Chronically Homeless	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Elderly	0.00	\$ 0.00	\$ 0.00	\$ 0.00
HIV/AIDS	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Other Disability	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Severely Mentally Ill	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Veterans	0.00	\$ 0.00	\$ 0.00	\$ 0.00
Victims of Domestic Violence	0.00	\$ 0.00	\$ 0.00	\$ 0.00

Environmental Review	Action Required	Open
Legislative Contacts	Action Required	Open
Racial Equity	Action Required	Open
Match Exemptions	Action Required	Open
Match Worksheet	Action Required	Open
Indirect Costs Certification	Action Required	Open
General Certifications	Action Required	Open
Budget The button will update to reflect how you can interact with this step.	Complete	Edit

Environmental Review

Legislative Contacts

Legislative Contacts ▾

Delete Save Draft **Mark Complete** Close

Legislative Contact Information

Please select ALL county(ies) in which the Applicant, Applicant's subrecipient and/or activity location will be.

- | | | | |
|------------------------------------|--------------------------------------|--|-------------------------------------|
| <input type="checkbox"/> Alameda | <input type="checkbox"/> Kings | <input type="checkbox"/> Placer | <input type="checkbox"/> Shasta |
| <input type="checkbox"/> Alpine | <input type="checkbox"/> Lake | <input type="checkbox"/> Plumas | <input type="checkbox"/> Sierra |
| <input type="checkbox"/> Amador | <input type="checkbox"/> Lassen | <input type="checkbox"/> Riverside | <input type="checkbox"/> Siskiyou |
| <input type="checkbox"/> Butte | <input type="checkbox"/> Los Angeles | <input type="checkbox"/> Sacramento | <input type="checkbox"/> Solano |
| <input type="checkbox"/> Calaveras | <input type="checkbox"/> Madera | <input type="checkbox"/> San Benito | <input type="checkbox"/> Sonoma |
| <input type="checkbox"/> Colusa | <input type="checkbox"/> Marin | <input checked="" type="checkbox"/> San Bernardino | <input type="checkbox"/> Stanislaus |

- | | | | |
|---------------------------------------|------------------------------------|--|-----------------------------------|
| <input type="checkbox"/> Contra Costa | <input type="checkbox"/> Mariposa | <input type="checkbox"/> San Diego | <input type="checkbox"/> Sutter |
| <input type="checkbox"/> Del Norte | <input type="checkbox"/> Mendocino | <input type="checkbox"/> San Francisco | <input type="checkbox"/> Tehama |
| <input type="checkbox"/> El Dorado | <input type="checkbox"/> Merced | <input type="checkbox"/> San Joaquin | <input type="checkbox"/> Trinity |
| <input type="checkbox"/> Fresno | <input type="checkbox"/> Modoc | <input type="checkbox"/> San Luis Obispo | <input type="checkbox"/> Tulare |
| <input type="checkbox"/> Glenn | <input type="checkbox"/> Mono | <input type="checkbox"/> San Mateo | <input type="checkbox"/> Tuolumne |
| <input type="checkbox"/> Humboldt | <input type="checkbox"/> Monterey | <input type="checkbox"/> Santa Barbara | <input type="checkbox"/> Ventura |
| <input type="checkbox"/> Imperial | <input type="checkbox"/> Napa | <input type="checkbox"/> Santa Clara | <input type="checkbox"/> Yolo |
| <input type="checkbox"/> Inyo | <input type="checkbox"/> Nevada | <input type="checkbox"/> Santa Cruz | <input type="checkbox"/> Yuba |
| <input type="checkbox"/> Kern | <input type="checkbox"/> Orange | | |

Provide the Legislative and Congressional information for the applicant, applicant's subrecipient AND each activity location, (if different than applicant location), included in this application.

To locate or verify the Legislative and Congressional information, click on the respective links below and enter the Applicant's location zip code, the activity location site zip code(s) (i.e. zip code(s) where activities are performed), and any additional activity location site(s), as applicable.

California State Assembly

[California State Assembly](#)

Assembly Members (Check ALL that apply)

- District 1 - Heather Hadwick
- District 2 - Chris Rogers
- District 3 - James Gallagher
- District 4 - Cecilia Aguiar-Curry
- District 5 - Joe Patterson
- District 6 - Maggy Krell
- District 7 - Josh Hoover
- District 8 - David Tangjpa
- District 9 - Heath Flora
- District 10 - Stephanie Nguyen
- District 11 - Lori D. Wilson
- District 12 - Damon Connolly
- District 13 - Rhodesia Ransom
- District 14 - Buffy Wicks
- District 15 - Anamarie Avila Farias
- District 16 - Rebecca Bauer-Kahan
- District 17 - Matt Haney

- District 18 - Mia Bonta
- District 19 - Catherine Stefani
- District 20 - Liz Ortega
- District 21 - Diane Papan
- District 22 - Juan Alanis
- District 23 - Marc Berman
- District 24 - Alex Lee
- District 25 - Ash Kalra
- District 26 - Patrick J. Ahrens
- District 27 - Esmeralda Soria
- District 28 - Gail Pellerin
- District 29 - Robert A. Rivas
- District 30 - Dawn Addis
- District 31 - Dr. Joaquin Arambula
- District 32 - Vacant
- District 33 - Alexandra M. Macedo
- District 34 - Tom Lackey
- District 35 - Jasmeef Bains

- District 36 - Jeff Gonzales
- District 37 - Gregg Hart
- District 38 - Steve Bennett
- District 39 - Juan Carrillo
- District 40 - Pilar Schiavo
- District 41 - John Harabedian
- District 42 - Jacqui Irwin
- District 43 - Celeste Rodriguez
- District 44 - Nick Schultz
- District 45 - James C. Ramos
- District 46 - Jesse Gabriel
- District 47 - Greg Wallis
- District 48 - Blanca Rubio
- District 49 - Mike Fong
- District 50 - Robert Garcia
- District 51 - Rick Chavez Zbur
- District 52 - Jessica M. Caloza
- District 53 - Michelle Rodriguez

California State Senators

[California State Senate](#)

Senators (Check ALL that apply)

- District 1 - Megan Dahle
- District 2 - Mike McGuire
- District 3 - Christopher Cabaldon
- District 4 - Marie Alvarado-Gil
- District 5 - Jerry McNerny
- District 6 - Roger W. Niello
- District 7 - Jesse Arreguin
- District 8 - Angelique V. Ashby
- District 9 - Tim Grayson
- District 10 - Aisha Wahab
- District 11 - Scott Wiener
- District 12 - Shannon Grove
- District 13 - Josh Becker
- District 14 - Anna M. Caballero
- District 15 - Dave Cortese
- District 16 - Melissa Hurtado
- District 17 - John Laird

- District 18 - Steve Padilla
- District 19 - Rosilicie Ochoa Bogh
- District 20 - Caroline Menjivar
- District 21 - Monique Limon
- District 22 - Susan Rubio
- District 23 - Suzette Martinez Valladares
- District 24 - Benjamin Allen
- District 25 - Sasha Renee Perez
- District 26 - Maria Elena Durazo
- District 27 - Henry Stern
- District 28 - Lola Smallwood-Cuevas
- District 29 - Eloise Gomez Reyes
- District 30 - Bob Archuleta
- District 31 - Sabrina Cervantez
- District 32 - Kelly Seyarto
- District 33 - Lena Gonzalez
- District 34 - Thomas Umberg
- District 35 - Laura Richardson

- District 36 - Vacant
- District 37 - Steven Choi
- District 38 - Catherine Blakespear
- District 39 - Akliah Weber Pierson
- District 40 - Brian W. Jones

US House of Representatives

[US House of Representatives](#)

Representatives (Check ALL that apply)

- District 1 - Doug LaMalfa
- District 2 - Jared Huffman
- District 3 - Kevin Kiley
- District 4 - Mike Thompson
- District 5 - Tom McClintock
- District 6 - Ami Bera
- District 7 - Doris Matsui
- District 8 - John Garamendi
- District 9 - Josh Harder
- District 10 - Mark DeSaulnier
- District 12 - Lateefah Simon
- District 13 - Adam Gray
- District 14 - Eric Swalwell
- District 15 - Kevin Mullin
- District 16 - Sam Liccardo
- District 17 - Ro Khanna
- District 18 - Zoe Lofgren

- District 19 - Jimmy Panetta
- District 20 - Vince Fong
- District 21 - Jim Costa
- District 22 - David Valadao
- District 23 - Jay Obernolte
- District 24 - Salud Carbajal
- District 25 - Raul Ruiz
- District 26 - Julia Brownley
- District 27 - George Whitesides
- District 28 - Judy Chu
- District 29 - Luz Rivas
- District 30 - Laura Friedman
- District 31 - Gilbert Cisneros
- District 32 - Brad Sherman
- District 33 - Pete Aguilar
- District 34 - Jimmy Gomez
- District 35 - Norma Torres
- District 36 - Ted Lieu

- District 37 - Sydney Kamlager
- District 38 - Linda Sanchez
- District 39 - Mark Takano
- District 40 - Young Kim
- District 41 - Ken Calvert
- District 42 - Robert Garcia
- District 43 - Maxine Waters
- District 44 - Nanette Barragan
- District 45 - Derek Tran
- District 46 - Luis Correa
- District 47 - Dave Min
- District 48 - Darrell Issa
- District 49 - Mike Levin
- District 50 - Scott Peters
- District 51 - Sara Jacobs
- District 52 - Juan Vargas

- District 54 - Mark Gonzalez
- District 55 - Isaac G. Bryan
- District 56 - Lisa Calderon
- District 57 - Sade Elhawary
- District 58 - Leticia Castillo
- District 59 - Phillip Chen
- District 60 - Corey A. Jackson
- District 61 - Tina Simone McKinnor
- District 62 - Jose Luis Solache Jr.
- District 63 - Bill Essayli
- District 64 - Blanca Pacheco
- District 65 - Mike A. Gipson
- District 66 - Al Muratsuchi
- District 67 - Sharon D. Quirk-Silva
- District 68 - Avelino Valencia
- District 69 - Josh Lowenthal
- District 70 - Tri Ta
- District 71 - Kate Sanchez

- District 72 - Diane B. Dixon
- District 73 - Cottie Petrie-Norris
- District 74 - Laurie Davies
- District 75 - Carl DeMaio
- District 76 - Darshanna R. Patel
- District 77 - Tasha Boerner
- District 78 - Christopher Ward
- District 79 - LaShae Sharp-Collins
- District 80 - David A. Alvarez

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[Mark Complete](#)
[Close](#)

Racial Equity

Racial Equity

It is a Department priority to ensure that ESG programs are implemented in a way that addresses racial disparities in the homeless population and creates equitable outcomes. The Department requests that you, as the subrecipient for the Continuum of Care (CoC), analyze the racial inequities that may exist within your systems and work to address them. Answers in this section will not serve to qualify or disqualify applicants but rather will serve as a measure of the current state of each applicant's disparities, and guide future efforts to address them.

1. Please download the "HMIS – CoC Outcomes by Race and Ethnicity 2024 (CoC).xlsx" file from the Files tab in the 2024 ESG Allocation Application solicitation in eCivis Grants Management System.
2. Please refer to the NOFA Appendix A for your designated CoC number.
3. After downloading the tool, please follow the instructions on the instruction tab to insert HMIS data into the tool.
4. Save the file and upload below.

Upload the HMIS – CoC Outcomes by Race and Ethnicity 2024 (CoC).xlsx for your Continuum of Care. *

If your organization has already completed an analysis of racial disparities in its homeless response system, please upload here

Did your Organization apply for funding under any of the HCD 2023 ESG NOFAs? *

Continuum of Care 2022-23 Outcomes by Race and Ethnicity

Applicant Name:	San Bernardino County		CoC Name, if different:								
Using data from your HMIS, please insert outcomes here (using the period from October 1, 2022- September 30, 2023):											
	Experiencing Homelessness		Accessing Emergency Shelters		Exiting to Permanent Housing		Length of Time Homeless		Accessing Permanent Supportive Housing		
	#	%	#	%	#	%	#	%	#	%	
Total	4336	100%	2624	100%	2927	100%	134	100%	1497	100%	
White	1129	26%	1948	74%	769	26%	144	107%	318	21%	
Black	73	2%	1205	46%	1116	38%	137	102%	558	37%	
Native American/Alaskan	52	1%	38	1%	34	1%	136	101%	7	0%	
Asian/Pacific Islander	33	1%	25	1%	23	1%	128	96%	5	0%	
Other/Multi-Racial	81	2%	98	4%	54	2%	96	72%	28	2%	
Ethnicity						0%		0%		0%	
Hispanic	1454	34%	94	4%	985	34%	121	90%	370	25%	
Non-Hispanic	2882	66%		0%	1942	66%	141	105%	1127	75%	

Did your Organization apply for funding under any of the HCD 2023 ESG NOFAs? *

- Yes
- No

Does your organization have requirements for all sub-grantees to look at data to determine racial disparities in their programs? *

- Yes
- No

Does your organization have requirements for all sub-grantees to put a plan in place to address racial disparities if they exist? *

- Yes
- No

Describe how underserved and marginalized communities learn about the ESG program offerings. What marketing and communication strategies are used to increase equitable access? Check all that apply. *

- Formal partnerships such as MOUs or subrecipient agreements with organizations serving underserved and marginalized communities.
- Informal partnerships with organizations serving underserved and marginalized communities.

Coordinated Entry Access Points in underserved and marginalized communities

Materials in multiple languages and accessible on CoC website:

Communication campaigns on social media, radio, television, or flyers targeted to underserved and marginalized communities.

Other

None

Please provide a narrative and links for the Formal Partnerships selection: *

We have established formal partnerships through Memoranda of Understanding (MOUs) and subrecipient agreements with community-based organizations that serve underserved and marginalized populations. These partnerships ensure that ESG program information is directly shared with communities that are most at risk of homelessness, including communities of color, LGBTQ+ individuals, and people with disabilities. Through these agreements, organizations act as trusted intermediaries, assisting in the dissemination of information and connecting clients to available ESG services.

Please provide a narrative and links for the Informal Partnerships selection: *

In addition to formal partnerships, we also engage in informal collaborations with local groups that serve marginalized communities. These partnerships help foster relationships within neighborhoods that may not traditionally be reached through more formalized channels. Informal partnerships involve leveraging the networks of grassroots organizations, faith-based groups, and local advocates to spread awareness about ESG offerings, ensuring that information reaches those who are most in need.

Please provide a narrative and links for the Coordinated Entry Access Points selection: *

To further increase equitable access, ESG program information is available at Coordinated Entry Access Points located in areas frequented by underserved and marginalized communities. These access points serve as centralized locations where individuals can learn about available ESG resources and receive assistance with accessing emergency shelter, rapid re-housing, and homelessness prevention services. By placing these entry points within communities that face higher rates of homelessness, we ensure that more individuals have the opportunity to connect with ESG services.

Please provide a narrative and links for the Communication Campaigns selection *

We implement targeted communication campaigns to raise awareness of the ESG program through multiple channels. These campaigns include social media outreach, the distribution of flyers in community centers, food pantries, and local businesses within marginalized neighborhoods. By utilizing a mix of traditional and digital media, we increase the reach and visibility of the ESG program among those who may be disconnected from mainstream communication channels. Our campaigns are designed to be culturally relevant and sensitive to the specific needs of underserved communities, ensuring that all individuals are informed about the resources available to them.

If your organization has done none of these, please describe what concrete steps it will take to build equitable access and outcomes for ESG programs and other homeless services in the coming program year: *

N/A

If your organization has only done a couple of these, please describe what concrete steps it will take to build equitable access and outcomes for ESG programs and other homeless services in the coming program year: (If not applicable please type N/A) *

N/A

Does your grant making process prioritize programs that address the disproportionate impacts of homelessness and on communities of color, particularly Black, Latinx, Asian, Pacific Islander, Native and Indigenous communities? *

- Yes
- No

Please describe what steps your organization will take to prioritize programs that address the disproportional impacts of homelessness on communities of color in the

coming program year.

(Narrative) Describe: *

organizations led by people of color, as these organizations are often best equipped to create solutions that meet the specific needs of underserved racial and ethnic groups. Additionally, our grant-making process is data-driven, using demographic data to assess racial disparities in homelessness and ensure resources are distributed equitably. By prioritizing these strategies, we will ensure that ESG funding directly supports efforts to reduce the disproportionate impacts of homelessness on communities of color.

(Narrative) Describe:

Please answer the following questions in regards to whether the voices of Black, Latinx, Asian, Pacific Islander, Native and Indigenous communities and those who have lived experience of homelessness is being centered in a meaningful, sustained way in creating effective approaches to reducing and ending homelessness; And whether they are involved in the funding decision making processes.

Does your Organizational governance structure include permanent seats for individuals with lived experience of homelessness? *

- Yes
- No

Does your Organizational governance structure include seats for representatives from Black, Latinx, Asian, Pacific Islander, Native and Indigenous communities? *

- Yes
- No

Does your ESG Grantee funding application review panel/body include permanent seats for individuals with lived experience of homelessness? *

- Yes
- No

Does your ESG Grantee funding applications review panel/body include permanent seats for representatives from Black, Latinx, Asian, Pacific Islander, Native and indigenous communities? *

- Yes
- No

Does your Organization utilize other policies or methods of centering voices of Black, Latinx, Asian, Pacific Islander, Native and Indigenous communities and those with lived experience of homelessness? *

- Yes
- No

Please describe these policies or methods: *

programs. We also hold regular listening sessions and community meetings in partnership with local organizations to hear directly from these communities about their needs and experiences. To ensure our staff can effectively engage with diverse communities, we provide ongoing cultural competency training and collaborate with experts from these communities. We also prioritize working with organizations led by people of color to make sure that the services we offer are culturally relevant and accessible. Additionally, we advocate for policies that focus on the needs of marginalized groups and ensure that their voices are heard in local and national discussions about homelessness. Finally, we collect feedback and data on the effectiveness of our programs, making sure that these communities continue to have a voice in shaping our services. Through these actions, we strive to create programs that are truly responsive to the needs of those most impacted by homelessness.

(Optional) Please upload the Policy for centering voices of Black, Latinx, Asian, Pacific Islander, Native and Indigenous communities and those with lived experience of homelessness

(Optional) Please reference the applicable page number in the Policy.

Does your organization have other advisory bodies that provide input and recommendations around your homeless response system? *

- Yes
- No

Please list and include the Name of advisory body: *

local government, and community organizations. In addition to the CoC board, we also engage individuals with lived experience of homelessness, representatives from community-based organizations, and experts working with marginalized groups, including people of color, LGBTQ+ individuals, and those with disabilities. Their input is essential in ensuring that our services are effective, inclusive, and responsive to the real needs of the communities we serve. By incorporating their recommendations, we can continuously improve our approach to ending homelessness and provide the best support to those in need.

Does this body include permanent seats for (Check all that apply): *

- Individuals with lived experience of homelessness
- Representatives from Black, Latinx, Asian, Pacific Islander, Native and Indigenous communities

Are there additional advisory bodies? *

- Yes
- No

Are ESG funds being made accessible to smaller and non-traditional organizations that have historically served communities of color but may not have previously participated formally in the CoC or be a part of the homeless provider community? *

- Yes
- No

Attach communications, memo, resolution, policies, procedures or guidelines your CoC has developed to ensure access to ESG funds for these smaller and non-traditional organizations. *

+ Select a file [input field]

What steps has your organization taken to ensure these funds address the organizational capacity of organizations that are led by Black, Latinx, Asian, Pacific Islander, Native and Indigenous people that support the goal of making homelessness rare, brief and non-recurring? (Please Describe): *

Our organization is committed to ensuring that funds address the organizational capacity of organizations led by Black, Latinx, Asian, Pacific Islander, Native, and Indigenous people, all while supporting the goal of making homelessness rare, brief, and non-recurring. To achieve this, we prioritize targeted capacity-building support, offering training, technical assistance, and funding for infrastructure development to strengthen the ability of these organizations to provide effective services. We also offer dedicated funding opportunities to organizations led by and serving these communities, helping them expand their programs and improve their impact in preventing and ending homelessness. In addition, we actively build partnerships with community organizations that have strong connections to marginalized groups, ensuring that their services are culturally relevant and effectively reach those in need. Our work includes engaging these organizations in policy development to address racial disparities in homelessness, ensuring that their unique needs are reflected in all aspects of our approach.

Attach communications, memo, resolution, policies, procedures or guidelines your CoC has developed to build capacity for these non-traditional organizations. *

+ Select a file [input field]

What steps will your Organization take in the coming program year to ensure these funds address the organizational capacity of organizations that are led by Black, Latinx, Asian, Pacific Islander, Native and Indigenous people that support the goal of making homelessness rare, brief, and non-recurring. *

Additionally, we plan to facilitate partnerships between these organizations and larger service networks, ensuring that they have the resources and collaborative support necessary to grow and improve. We will continue to involve organizations led by Black, Latinx, Asian, Pacific Islander, Native, and Indigenous people in policy and decision-making processes, ensuring their voices are central to shaping effective, culturally competent responses to homelessness. Through these actions, we aim to build the organizational capacity of culturally specific groups, equipping them to play a leading role in ending homelessness and achieving the goal of making homelessness rare, brief, and non-recurring in the coming year.

Attach communications, memo, resolution, policies, procedures or guidelines your CoC has developed to build capacity for these non-traditional organizations. *

+ Select a file [input field]

Partner Organizations Addressing Racial Equality

Do you have partner organizations that are addressing racial equity in the housing and homeless response system? *

- Yes
- No

Submission Date

03/28/2025 [input field]

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Match Exemptions – N/A

Match Exemptions

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Match Exemption Application (Optional)

N/A [input field]

ESG is currently accepting Match Exemption Applications towards the 2024 ESG awards. Total maximum match exemption award available is \$100,000. All match exemption applications must be submitted simultaneously with your 2024 ESG application, no later than Friday March 28, 2025, by 5:00 p.m.

If you would like us to consider your organization for this exemption request, please read the following information below to also include specific questions and instructions for submittal.

a. General Requirement HCD requires each ESG Subrecipient to provide match equal to 100% of the ESG funds that HCD awards. The only exception is outlined in Section III.C.2 of the HCD ESG Match Policy.

Please note: The exemption request is only valid for the 2024 ESG applications/awards; no other funding year will apply under this application. Information noted below is not all inclusive. For specific HCD ESG policy information please read the full document listed on our webpage here: [ESG Match Policy](#)

b. Match Exemption Under each fiscal year's (FY's) annual ESG allocation, HCD is not required to match the first \$100,000 allocated. HCD is required to pass this benefit to the Subrecipient or Subrecipients who are least able to provide match.

HCD uses its annual Subrecipient ESG application process to determine which Subrecipient(s) will receive the match exemption via the following process:

- Each Subrecipient's application will receive a 'match exemption score'
- The 'match exemption score' (**up to a maximum of 10 points**) is calculated as follows:

2 points are allocated to the following Subrecipients, which are considered rural and therefore disproportionately likely to be under-resourced:

- Marin County CoC
- Napa City & County CoC
- Vallejo/Solano County CoC
- Watsonville/Santa Cruz City & County
- Davis/Woodland/Yolo County CoC
- El Dorado County CoC
- Imperial County CoC
- Inyo, Mono, Alpine Counties CoC
- Merced City & County CoC
- Roseville/Rocklin/Place County CoC
- Santa Maria/Santa Barbara County CoC
- Visalia, Kings, Tulare Counties CoC
- Nevada County CoC
- Amador, Calaveras, Tuolumne, and Mariposa Counties CoC

- Chico/Paradise/Butte County CoC
- Colusa, Glenn, Trinity Counties CoC
- Humboldt County CoC
- Lake County CoC
- Mendocino County CoC
- Redding/Shasta, Siskiyou, Lassen, Plumas, Del Norte, Modoc, Sierra Counties CoC
- Tehama County CoC
- Yuba City & County/Sutter County CoC

3 points are allocated to Subrecipients that meet either of the following criteria:

- During the annual monitoring process, HCD reported a concern or finding related to the Subrecipient's difficulty producing the necessary level of match; or
- During the previous year, the Subrecipient provided 75% or less of its match requirements

Up to 5 points are allocated to Subrecipients who indicate as part of their application that they would like to receive the match exemption; points will be awarded based on a short narrative in which Subrecipients will be asked to explain the circumstances that qualify them as unable to meet the match requirement, with more points being allocated to Subrecipients reporting greater relative need.

If one Subrecipient receives the highest 'match exemption score,' that Subrecipient will receive the full \$100,000 match exemption; if multiple Subrecipients receive the highest 'match exemption score,' the match exemption will be divided among **no more than two of the highest-scoring Subrecipients** at HCD's discretion.

HCD has final decision on which Subrecipient(s) benefit from the match exemption and its decision cannot be appealed.

Please select your CoC

609 - San Bernardino City & County CoC

Question 1 - During the most recent annual monitoring process, did HCD report a Concern or Finding related to your organization's difficulty producing the necessary level of match?

- No
- Yes

Question 2 - Did your organization provide 75% or less of its match requirements during the previous year?

- No
- Yes

Question 3 - Explain the circumstances that qualify your agency as least able to meet the match requirement?

We will not be applying for an exemption. Filling out per application.

Question 4 - Why do you think your agency's need is most relative?

We will not be applying for an exemption. Filling out per application.

CERTIFICATION

Must be signed by the Authorized Representative named in your Resolution **

Please print or pdf this form and either provide an original signature, printed name, title and date, using blue ink -OR- you may electronically sign by using a form of eSign software. Once the document has been signed, please upload the signed copy in the below file upload button labeled "Upload signed copy here"

Name and Title of Authorized Representative

Marcus Dillard - Chief of Homeless Services

Authorized Representative's Signature

Date

3/5/2025

Upload signed copy here

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Select a file
?

Match Worksheet

Match Worksheet ▾

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MATCH CERTIFICATION - 2024 ESG Allocation

Match requirements

Funded applicants must make matching contributions that equal 100% of federal ESG funds awarded. HCD will request documentation as part of its monitoring to determine the sources and amounts used to meet the federal ESG matching requirements in accordance with [24 CFR § 576.201](#).

Eligible Types of Match

Match can be provided in the form of either:

- Cash match, which is be cash expended for allowable costs by the recipient or subrecipient;
- In-kind match (also called noncash match), which is the value of any real property, equipment, goods, services, or donated building contributed by the recipient or

subrecipient's ESG project, provided that, if the contribution had been paid for with ESG funds, the cost would have been allowable.

Match requirements can be met with any combination of cash match and in-kind match provided that the combined value of all provided match meets the minimum match requirement established by the relevant grant agreement.

More information about the eligible types of match can be found in the ESG Program interim rule at [24 CFR § 576.201\(d\)](#).

Eligible Sources of Match

Funds and contributions from any source other than the ESG Program are eligible for use as match, including but not limited to other federal funds, local/state government funds, and private donations of cash, property, and labor, provided that they meet the following criteria:

- They meet the requirements under [2 CFR § 200.306](#), excluding the expenditure limits in [24 CFR § 576.100](#);
- The match source is not prohibited from matching the ESG Program, HUD programs, or federal funds in general;
- The contribution would have been an allowable cost under the ESG Program if paid for using ESG funds.

For more information about match, please see [HCD/ESG's Match Policy](#)

Instructions:

- Enter your Organization's Name
- Enter the proposed ESG application amount

Organization Name (As listed in your Profile and Resolution) *

San Bernardino County

Enter Estimated HCD allocation amount for your Service Area found in Appendix A of the 2024 ESG NOFA. *

\$ 1,248,208

Please list all Matching Funds as well as sources of Match you are going to use. You must itemize each source of Match separately.

NOTE: The total match funds must equal the total federal ESG grant amount.

CASH MATCH

Instructions:

- Select a Match Source from the drop-down list
- For Description, enter the name of the specific program or other relevant descriptor for the source of match
- Enter the amount of cash match for each source listed.

NOTE: If there is more than one program providing match from a specific source, list each out separately.

Considering the instructions above, how many sources/descriptions of "Cash Match" do you need to enter? *

1

Source of Cash Match #1 (Select a value from the drop-down list)

State Government

Description of Cash Match Funds #1

HHAP Grant

Cash Match Amount #1

\$ 1,248,208

IN-KIND MATCH

Instructions:

- In the Source box, list the organization or entity providing the in-kind match.
- In the Description box, enter a description of the in-kind resource (e.g., volunteer hours, donated supplies, etc.).
- In the Amount box, enter the value of the in-kind resource, calculated pursuant to 2 CFR 200.

NOTE: If there is more than one program providing match from a specific source, list each out separately.

Considering the instructions above, how many sources/descriptions of "In-Kind Match" do you need to enter? *

0

CERTIFICATION

Must be signed by the Authorized Representative named in your Resolution **
Please print or pdf this form and either provide an original signature, printed name, title and date, using blue ink -OR- you may electronically sign by using a form of eSign software. Once the document has been signed, please upload the signed copy in the below file upload button labeled "Upload signed copy here"

By signing below, I certify on behalf of my Organization that all of the above information is accurate, true and complete to the best of my knowledge. I am also aware that HCD has the right to request proof of all information provided to verify accuracy and maintain the integrity of the program.

Name and Title of Authorized Representative

Marcus Dillard - Chief of Homeless Services

Signature of Authorized Representative

Date

3/5/2025

Upload Signed Copy Here

+ Select a file

Indirect Costs Certification

Indirect Costs Certification ▾

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Indirect Costs Certification

Applicant/Organization Name *

San Bernardino County

Will your Organization seek reimbursement for indirect costs for the 2024 ESG funds? *

Yes

No

Are you requesting more than the 15% De Minimis rate? *

No

Yes

***If claiming more than the 15% De Minimis Indirect Cost Rate, you will need to upload either a copy of your Negotiated Indirect Cost Rate Agreement, or your Cost Allocation Plan.

Upload a copy of the Negotiated Indirect Cost Rate Agreement (NICRA) from a Federal Cognizant Agency, which shows the "Approved Indirect Cost Rate Percentage"

+ Select a file

Upload a Cost Allocation Plan

+ Select a file

****Please note: If you do not upload one of the above listed items, HCD will not consider your agency as being approved for a higher rate than the 15% De Minimis.**

I certify under penalty of perjury that:

1. To the best of my knowledge and belief that the form is true, complete, and accurate, an the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the ESG program.

2. I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims or otherwise. [18 U.S.C. § 1001](#), [31 U.S.C. § 3729](#), [31 U.S.C. § 3730](#), and [31 U.S.C. § 3801-3812](#).

3. If the applicant will seek reimbursement for any indirect costs, the applicant must:

- Comply with all OMB requirements and standards including [2 CFR § 200.403](#), [2 CFR § 200.415](#), and [Appendix IV to Part 200](#),
- Certify that the applicant and/or any subcontractor seeking reimbursement for indirect costs at the de minimis rate do not meet the definition of a major nonprofit organization as defined by OMB [2 CFR § 200.414](#), and
- Maintain records including evidence of the Modified Total Direct Cost (MTDC) [2 CFR § 200.68](#) calculations, indirect cost limits, and supporting documentation for actual direct cost billing.

I further certify that I am aware that there are penalties for willfully and knowingly giving false information on an application for federal or State funds that may include immediate repayment of all federal or State funds received. I understand that the information submitted is subject to verification by federal or State personnel as part of compliance monitoring.

CERTIFICATION

Must be signed by the Authorized Representative named in your Resolution**

Please print or pdf this form and either provide an original signature, printed name, title and date, using blue ink -OR- you may electronically sign by using a form of eSign software. Once the document has been signed, please upload the signed copy in the below file upload button labeled "Upload signed copy here"

Name and Title of Authorized Representative

Marcus Dillard - Chief of Homeless Services

Signature of Authorized Representative

Date

3/5/2025

Please upload signed copy here

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General Certifications

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General Certifications

San Bernardino County

General Certifications

MUST be completed by the Authorized Representative as stated in the resolution

In accordance with the applicable statutes and the regulations governing the ESG Program, the Applicant must certify to the following:

Affirmatively Further Fair Housing - As required under 24 CFR 576.407(b), the Applicant will make known that use of the facilities, assistance and services are available to all on a nondiscriminatory basis. If it is unlikely that the procedures that the recipient or subrecipient intends to use to make known the availability of the facilities, assistance and services will reach persons of any particular race, color, religion, sex, age, national origin, familiar status or disability who may qualify for those facilities and services, the recipient of subrecipient must establish additional procedures that ensure that those persons are made aware of the facilities.

not limited to, adopting procedures that will make available to interested persons information concerning the location of assistance, services and facilities that are accessible to persons with disabilities. Consistent with Title VI and Executive Order 13166, recipients and sub-recipients are also required to take reasonable steps to ensure meaningful access to programs and activities for limited English proficiency (LEP) persons.

Anti-displacement and Relocation Plan - As required under 24 CFR 576.408, the Applicant will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended and implementing regulations at 49 CFR 24, and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME Programs.

Drug Free Workplace - As required by 24 CFR 576.407(a) and detailed in 24 CFR part 21, the Applicant will provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession or use of a controlled substance is prohibited in the Applicant's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about:
 - o The dangers of drug abuse in the workplace;
 - o The grantee's policy of maintaining a drug-free workplace;
 - o Any available drug counseling, rehabilitation and employee assistance programs; and
 - o The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.
 1. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
 2. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will:
 - o Abide by the terms of the statement; and
- o Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction.
 1. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4b, from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
 2. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4b, with respect to any employee who is so convicted:
 - o Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended, or
 - o Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State or local health, law enforcement or other appropriate agency, and,
 1. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

Anti-Lobbying - As required and detailed in 24 CFR part 87, to the best of the Applicant's knowledge and belief:

No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement and the extensions, continuation, renewal, amendment or modification of any Federal contract, grant, loan or cooperative agreement.

If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a member of Congress, an officer or employee of Congress or an employee of a Member of Congress in connection with this Federal contract, grant, loan or

cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying", in accordance with its instructions; and * It will require that the language of paragraphs 1 and 2 of this anti-lobbying certification be included in the award documents for all sub awards at all tiers (including subcontracts, subgrants and contracts under grants, loans and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction - The consolidated plan is authorized under State and local law (as applicable) and the Applicant possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Section 3 - As required by 24 CFR 576.407(a), the Applicant will comply with section 3 of the Housing and Urban Development Act of 1968 and implementing regulations at 24 CFR Part 135.

Participation in CoC HMIS and Compliance with Participation Requirements - As required by 24 CFR 576.400(f), the Applicant will collect and enter data on all persons served and all activities assisted under ESG into the applicable community-wide Homeless Management Information System (HMIS) in the area in which those persons and activities are located or a comparable database, in accordance with HUD's standards on participation, data collection and reporting under a local HMIS and local CoC HMIS policies, procedures and participation requirements.

Participation in CoC Planning and Governance - The Applicant participates in local CoC planning, governance, performance evaluation and management process. Consult the CoC for planning and governance related to determining how to allocate ESG funds each program year; developing the performance standards for and evaluating the outcomes of, projects and activities assisted by ESG funds; and developing funding, policies and procedures for the administration and operation of the HMIS.

Participation in CoC Coordinated Entry System - As required by 24 CFR 576.400(d), the Applicant participates in the local CoC's Coordinated Entry System (CES) in accordance with HUD requirements. If the CoC has not yet established a CES, the Applicant will participate after their respective CoC has devised and implemented such as assessment system.

Matching Funds - As required by 24 CFR 576.201, the Applicant will obtain required matching amounts.

Minority Business Enterprises and Women's Business Enterprise (M/WBE) - As required by Executive Order 11625, the Applicant must annually compile and report data on M/WBE activity for submission to the Minority Business Development Agency of the Department of Commerce.

Confidentiality - As required by 24 CFR 91.325(c)(3) and federal ESG Regulations (24 CFR 576.500(x)) the Applicant has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family-violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family-violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Compliance - The Department may require information from an Applicant that demonstrates compliance with any of the program requirements and shall provide such information when requested.

Religious Compliance - The Applicant agrees to provide all eligible activities under this Program in a manner that is in accordance with 24 CFR 576.406:

1. It will not discriminate against any employee or applicant for employment on the basis of religion and will not limit employment or give preference in employment to persons on the basis of religion;
2. It will not discriminate against any person applying for shelter or any of the eligible activities under this part on the basis of religion and will not limit such housing or other eligible activities or give preference to persons on the basis of religion; and,
3. It will provide no religious instruction or counseling, conduct no religious workshop or services, engage in no religious proselytizing and exert no other religious influence in the provision of shelter and other eligible activities under this Project.

Homeless Persons Involvement - As required by 24 CFR 91.325(c)(4)(vii), to the maximum extent practicable, the Applicant will involve, through employment, volunteer services or otherwise homeless individuals and families in constructing, renovating, maintaining and operating facilities assisted under the ESG program, in providing services assisted under the ESG program and in providing services for occupants of facilities assisted under the program.

Consolidated Plan - All activities the Applicant undertakes with assistance under ESG are consistent with the State's Consolidated Plan.

Discharge Policy - The Applicant will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or youth facilities or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Environmental Requirements - As required by 24 CFR 576.407(d), all activities the Applicant undertakes with assistance under ESG will be consistent with the environmental review responsibilities as described under 24 CFR 576.407(d). As required by 24 CFR 576.404(a) and (b), the Applicant will keep records to show compliance with the Organizational and Individual Conflicts-of-Interest requirements as described under 24 CFR 576.404(a).

Build America, Buy America Act - The applicant certifies it will comply with the Build America, Buy America Act included in the Infrastructure Investment and Jobs Act (Pub. L. 117-58) and implementing regulations (2 CFR Part 184).

Recordkeeping and Reporting Requirements - As required by 24 CFR 576.500, the Applicant has policies and procedures to ensure HUD's requirements for recordkeeping and reporting are met. The policies and procedures must be established in writing and implemented by the Applicant to ensure that ESG funds are used in accordance with these requirements.

Essential Services and Operating Costs - As required under 24 CFR 91.325(c)(4)(iv), in the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the Applicant will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long as the Applicant serves the same type of person (e.g., families with children, unaccompanied youth, disabled individuals or victims of domestic violence) or persons in the same geographic area.

Supportive Services - As required under 24 CFR 91.325(c)(4)(vi), the Applicant will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision and other services essential for achieving independent living) and

other federal, State, local and private assistance available for such individuals.

Accessibility of Services - As required under 24 CFR 576.407(b) the Applicant's Procedures meets the regulatory requirements relating to:

Access/Transportation - communicating with and ensuring that persons with disabilities have access to the location of assistance, services and facilities.

Disability Accommodations - requests for Reasonable Accommodations.

Linguistic Needs - ensuring meaningful access to programs and activities for LEP persons. Include a separate description for each Activity, if different.

Emergency Shelter

Program Fees - Applicant does not deny assistance to Program Participants due to an inability pay Occupancy Fees and/or Contributions.

Leases/Occupancy Agreements - As required under 24 CFR 576.2, an Applicant does not require a Program Participant to sign a lease or an occupancy agreement.

Day Shelters - A day shelter must meet the criteria in the Emergency Shelter definition, 24 CFR 576.2. The primary purpose of a day shelter must be to provide temporary shelter for persons experiencing homelessness. Facilities such as multi-purpose centers or stand-alone soup kitchens do not qualify as Emergency Shelters. Day shelters must target to people who are sleeping on the streets or in an emergency shelter. Clients experiencing homelessness must be permitted to stay at the day shelter all hours it is open.

Prohibition Against Involuntary Family Separation - As required by 24 CFR 576.102(b), the age of a child under age 18 must be used as a basis for denying any family admission to an emergency shelter that uses ESG funding or services and provides shelter to families with children under age 18.

STATEMENT OF CERTIFICATIONS

Must be signed by the Authorized Representative named in your Resolution**

Please print or pdf this form and either provide an original signature, printed name, title and date, using blue ink -OR- you may electronically sign by using a form of eSign software. Once the document has been signed, please upload the signed copy in the below file upload button labeled "Upload signed copy here"

Applicant Name ("The Applicant")

San Bernardino County

By checking the box "I Agree, Acknowledge and Certify" as well as signing below, I am confirming that I have read all of the above General Certifications and certify that we, "The Applicant" will adhere to and follow all of the above in accordance with all applicable statutes and regulations governing the ESG Program.

I Agree, Acknowledge and Certify

Name and Title of Authorized Representative

Marcus Dillard, Chief of Homeless Services

Signature of Authorized Representative

Marcus Dillard

Date

2/28/2025

***Upload signed copy here**

+ Select a file



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Mark Complete

Close

**County of San Bernardino
Office of Homeless Services (OHS)**



**Emergency Solutions Grant (ESG)
and ESG-COVID 19 (ESG-CV)
Policies and Procedures Manual**

560 E. Hospitality Lane, Suite 200
San Bernardino, CA 92408-0044
(909) 501-0600
www.SBCounty.gov

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I. Program Summary

A. Purpose

ANNUAL ESG

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) amended the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11371 – 11378), revising the Emergency Shelter Grants Program in significant ways and renaming it the Emergency Solutions Grants (ESG) program. The ESG Interim Rule took effect on January 4, 2012. The second allocation of FY 2011 ESG funding and future years are all subject to the ESG regulations. The first allocation of FY 2011 ESG funding and prior years are subject to the Emergency Shelter Grants Program regulations, (24 CFR Parts 91 and 576). ESG provides federal funds to assist individuals and families to quickly regain stability in permanent housing after experiencing a housing crisis or homelessness. ESG funds are available for five program components: street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and data collection through the Homeless Management Information System; as well as administrative activities.

ESG-CV

The Coronavirus Aid, Relief, and Economic Security Act of 2020 (CARES Act) provided for supplemental appropriation of Homeless Assistance Grants under the Emergency Solutions Grant (ESG). The limitations on Emergency Solutions Grant COVID-19 (ESG-CV) funds are to be used only to **prevent, prepare for and respond** to the Coronavirus pandemic.

Those definitions are:

- Prevent coronavirus: means an activity designed 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.
- Prepare for coronavirus: means 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 the disease.
- Respond to coronavirus: means 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 the coronavirus.

ESG-CV funds are subject to the following flexibilities and conditions provided by the CARES Act. These changes from general ESG guidelines apply **only** to ESG-CV grants:

- The funds may be used to cover or reimburse allowable costs incurred by a State or locality before the award of funding (including prior to the signing of the CARES Act) to prevent, prepare for, and respond to COVID-19;
- The funds are not subject to the spending cap on emergency shelter and outreach under 24 CFR 576.100(b)(1);
- The funds are exempt from the ESG match requirements, including 24 CFR 576.201.
- The funds are not subject to the consultation and citizen participation requirements that otherwise apply to the Emergency Solutions Grants, however each recipient must publish

how its allocation has and will be used, at a minimum, on the Internet at the appropriate Government web site or through other electronic media (In accordance with Section F.2.b of CPD Notice 21-08); AND

- The funds may be used to provide homelessness prevention assistance (as authorized under 24 CFR 576.103 or subsequent HUD notices) to any individual or family who does not have income higher than HUD's Very Low-Income Limit for the area and meets the criteria in paragraphs (1)(ii) and (1)(iii) of the "at risk of homelessness" definition in 24 CFR 576.3.

Some of the same flexibilities and conditions may be extended to annual ESG funding through a waiver process. Waivers must be applied for via a request process, upon receipt and approval by HUD the requested/approved waiver provisions may be applied to certain years of the annual ESG allocations provided the use of funds are to prevent, prepare for and respond to the coronavirus.

The deadline to expend ESG-CV funds is **September 30, 2022**. See spending timeline requirements in Section 2.2.5.

Projects funded with ESG-CV **must be** low barrier with a housing first orientation. Per HUD guidance, there is a prohibition on prerequisite activities, individuals and families assisted with these funds **must not be required** to receive treatment or perform any other prerequisite activities as a condition for receiving shelter, housing, or other services for which these funds are used, notwithstanding housing stability case management.

Program regulations are established in [24 CFR §576](#), the HUD ESG Interim Rule ([ESG Program and Consolidated Plan Conforming Amendment of 24 CFR Parts 91 and 576, Docket No. FR 5474-I-01, RIN 2506-AC29](#)), ESG-CV Notice CPD-21-05 issued April 14, 2021 and the [ESG-CV Notice](#) issued July 19, 2021.

In these policies and procedures, the term "grantee" refers to the lead ESG-CV grantee of the County of San Bernardino and any subgrantees. While reading the HUD ESG Interim Rule it is important to note the "recipient" in this case is County and the "subrecipient" is the ESG grantee (also referred to as subrecipients) of County. Not every section in the HUD ESG Interim Rule applies to County -administered ESG-CV. The County ESG-CV Guidelines define eligible activities and populations to be served which are subsets of what is listed in the ESG Interim Rule. HUD has a [quick reference guide](#) for use in determining eligible activities and costs under the ESG program.

All other applicable ESG guidelines still apply, unless otherwise indicated.

These policies and procedures will be updated, as necessary.

B. Application and Funding

1. Who May Apply?

The County of San Bernardino receives ESG funding from HUD as a formula allocation as a direct entitlement Grantee. The County is responsible for determining how the funds will best be apportioned to recipients. A competitive application process is used to ensure a balanced and fair distribution. Units of general local government or private non-profit organizations may apply for these funds.

2. Application Process

The County Funds allocated to the County from the HUD are made available to interested applicants through a Notice of Funding Availability (NOFA), which is typically issued once

every five years to coincide with the County's 5-Year Consolidated Plan (Con Plan). The agreements are for a one-year period with a provision to be extended for up to five years without a new NOFA process or board approval, providing in monetary increases in contract value do not exceed the procurement thresholds. The NOFA is published in local newspapers with substantial reach to ensure the public is adequately informed.

Instructions on how to apply for these funds are provided in the notice. The contact person from the grant programs department is listed in the notice for the benefit of interested parties who may have questions about the program. The updated NOFA, which includes application materials, may be downloaded from the County's website, with the appropriate website address provided at the time of release, prospective applicants can also register in the County's electronic procurement system at <https://epro.sbcounty.gov/bsa/> to be notified when the NOFAs are released.

Instructions and timelines for the receipt of application materials are clearly identified. Applicants are responsible for submitting materials on time to be considered. The application consists of four parts. The application narrative presents the basic elements of the threshold score, the project budget is scored as part of the application, and the cover sheet and HMIS/Comparable database are required to complete the application. Using defined rating criteria, the applications are reviewed and rated by an Independent Review Panel (IRP) composed of professionals and community members with knowledge and experience in homelessness issues. Scores from each application are averaged and the score reflects the IRP's determination of the merit of the project and ensuring the project aligns with CoC Written Standards, CoC performance goals, funding preferences, as established by the CoC, etc.

Methods of Procurement

During states of emergencies, pandemics or other instances of exigencies, procurement by non-competitive proposals may be utilized, as defined by 2 CFR Part §200.320(f):

(a) Procurement by noncompetitive proposals. Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one source and may be used only when one or more of the following circumstances apply:

- (1) The item is available only from a single source;
- (2) The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;
- (3) The Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the non-Federal entity; or
- (4) After solicitation of a number of sources, competition is determined inadequate.

If an exigency necessitates the deviation from procurement standards, then alternative written procurement standards must be established, and documentation maintained

regarding the alternative procurement standards used to safeguard against fraud, waste, and abuse in the procurement of goods and services to prevent, prepare for, and respond to coronavirus. In the event of a deviation from procurement standards, debarment and suspension regulations at 2 CFR part 180 and 2 CFR part 2424 will still apply as written.

Subrecipient/Contractor Determination

In accordance with Section 200.331 the County must make Subrecipient and contractor determinations prior to awarding funds. The non-Federal entity may concurrently receive Federal awards as a recipient, a subrecipient, and a contractor, depending on the substance of its agreements with Federal awarding agencies and pass-through entities. Therefore, a pass-through entity must make case-by-case determinations whether each agreement it makes for the disbursement of Federal program funds casts the party receiving the funds in the role of a subrecipient or a contractor. The Federal awarding agency may supply and require recipients to comply with additional guidance to support these determinations provided such guidance does not conflict with this section.

(a) Subrecipients. A subaward is for the purpose of carrying out a portion of a Federal award and creates a Federal assistance relationship with the subrecipient. See definition for Subaward in § 200.1 of this part. Characteristics which support the classification of the non-Federal entity as a subrecipient include when the non-Federal entity:

- (1) Determines who is eligible to receive what Federal assistance;
- (2) Has its performance measured in relation to whether objectives of a Federal program were met;
- (3) Has responsibility for programmatic decision-making;
- (4) Is responsible for adherence to applicable Federal program requirements specified in the Federal award; and
- (5) In accordance with its agreement, uses the Federal funds to carry out a program for a public purpose specified in authorizing statute, as opposed to providing goods or services for the benefit of the pass-through entity.

(b) Contractors. A contract is for the purpose of obtaining goods and services for the non-Federal entity's own use and creates a procurement relationship with the contractor. See the definition of contract in § 200.1 of this part. Characteristics indicative of a procurement relationship between the non-Federal entity and a contractor are when the contractor.

(c) Use of judgment in making determination. In determining whether an agreement between a pass-through entity and another non-Federal entity casts the latter as a subrecipient or a contractor, the substance of the relationship is more important than the form of the agreement. All of the characteristics listed above may not be present in all cases, and the pass-through entity must use judgment in classifying each agreement as a subaward or a procurement contract.

3. Awards and Written Agreements

Prior to awarding an agreement, the County will request from a prospective subrecipient a Due Diligence Documents Request (Attachment A) to ensure compliance with regulations. After careful review and approval of all due diligence documents, an Approval Notification letter (Attachment B) and draft Subrecipient agreement (Attachment C), including approved project budgets and performance measures, will be sent to subrecipients for approval.

The County will prepare the agreements in accordance with 24 CFR 576.407 and 2 CFR 200.331(a), and 24 CFR 200.332. The agreements will contain the following data elements, as identified on the ESG Written Agreement Checklist (Attachment D) pertaining to the subaward:

- Federal award identification;
- Subrecipient name;
- Subrecipient unique entity identifier;
- HUD award identification number;
- Federal Award date, as defined in 2 CFR 200.39 (date HUD signed award to grantee);
- Subaward period of performance start and end date;
- Total amount of the Federal award committed to the subrecipient by the recipient;
- Amount of Federal funds obligated by this action by the recipient to the subrecipient;
- Total amount of Federal funds obligated to the subrecipient by the recipient, including the current obligation;
- Federal Award project description, as required to be responsive to the Federal Funding Accountability and Transparency Act (FFATA);
- HUD's name, the name of the recipient, and contact information for the awarding official of the recipient;
- Catalog of Federal Domestic Assistance (CFDA) number and name of the HUD program under which the award is made;
- Identification of whether the award is Research & Development (R&D), if applicable
- Indirect cost rate for the HUD award to the recipient;
- Indirect cost rate for the subaward, if applicable (which must be an approved Federally- recognized indirect cost rate negotiated between the subrecipient and the Federal government or, if no such rate exists, either a rate negotiated between the recipient and the subrecipient (in compliance with 2 CFR part 200), or a de minimis indirect cost rate as defined in 24 CFR 200.414(f));
- All requirements imposed by the recipient on the subrecipient so that the subaward is used in accordance with the Federal statutes, regulations, and the terms and conditions of the HUD award to the recipient;
- Any additional requirements imposed by the recipient on the subrecipient for the recipient to meet its own responsibility to HUD, including identification of any required financial or performance reports; requirement that the subrecipient permit the recipient and auditors to have access to the subrecipient's records and financial statements as necessary for the recipient to meet its requirements under 2 CFR part 200;
- Appropriate terms and conditions concerning closeout of the subaward.

All finalized agreements must be taken to the San Bernardino County Board of Supervisors for approval. Upon Board approval of the Subrecipient agreement, County staff will: coordinate obtaining executed agreements from Subrecipients; verify budgets project activities and performance goals and measures; set-up each in Subrecipient project folder; set up the Subrecipient projects/activities in the HUD grant management system, Integrated Disbursement Information System (IDIS) and

the County's funds management System HDS, which requires the completion of the ESG Allocation/Set-up/Transform form (Attachment T).

Due Diligence Period

In accordance with federal, state, and local regulations, OHS must complete its due diligence/ organization evaluation prior to entering a legally binding contract to include collection but not limited to collection of the following:

1. Current IRS Exemption Ruling
2. Articles of Incorporation and Bylaws
3. Current Organizational Chart must also identify positions/titles that will be funded by ESG
4. Cost Allocation Plan, if applicable
5. Corporate Resolution designating Signature Authority
6. Operating Budget for CONTRACTOR and **all** subcontractors
7. Contracts and/or MOUs between all subcontractors, please ensure the language specifies that the funding is subject to all ESG rules and regulations
8. Franchise Tax Board Letter of Good Standing dated within the last year
9. Status of Domestic Corporation – Secretary of State of California
10. DUNS ID Certificate
11. Most recent **Audited Financial Report with Results/ Findings**
12. **Single Audit**, if more than \$750,000 of federal funds were expended during your last fiscal year
13. Proof of General Liability, Auto, and Workers Compensation Insurance, naming County of San Bernardino as Additional Insured
14. List of Board of Directors (Name, Position Held, and Contact Information),
15. Most recent Board Minutes
16. Copies of Board Member Resumes
17. Capacity of Organization and Statement of geographic areas served
18. Statements and resumes from key staff, consultants (if applicable), subcontractor's direct partners and as well as staff job descriptions
19. Staff Core Competencies
20. Proof of Registration in Systems for Award Management ("SAM") and
21. Proof of Registration in Homeless Management Information Systems ("HMIS").
22. Completed Lead-Based Paint and Habitability Requirements Inspection Emergency Shelter(s) with full clearances of any deficiencies. (if applicable).

During the due diligence process, the assigned ESG Program Manager will perform a precontracting Risk Assessment (Attachment U) of the Provider to determine the risk level and level of monitoring/oversight required to manage the subrecipient contract.

In accordance with 2 CFR 200.331(b), as part of the due diligence process and prior to making an award the County will evaluate the subrecipient's risk of noncompliance with Federal

Statutes, regulations and the terms of and conditions of the subaward to determine if the subrecipient will be identified for an award. OHS Program Manager shall complete (Attachment U) ESG Monitoring Risk Assessment to complete the necessary analysis. The risk of noncompliance will also be used to determine the level of monitoring required during the current year for the previous year’s performance period. The risk scoring system is as follows:

Risk Score	Risk Factor	Monitoring Requirement
0-5 points	Low	Yes, with less stringent reviews and frequency
6+ points	High	Yes, with more stringent reviews and greater frequency

See Section X. Monitoring in this handbook for additional information on monitoring.

As part of the risk assessment process, the Program Manager shall also review the subgrantee’s most recent certified audited financial statement/report or Form 990 tax filings with all applicable schedules and supporting expenditure documentation to determine if each subrecipient’s Federal award expended during the respective fiscal year equaled to exceed the threshold set forth in 2CFR 200.501. In accordance with 2 CFR 200.501 (b), if the entity is a non-Federal entity that expends \$750,000 or more in Federal awards during the non-Federal entity’s fiscal year, a single audit must be conducted in accordance with 2 CFR 200.514. The review must consider not only the amount of federal funds received directly from federal agencies, but also funds received from pass-through entities (subrecipients). The information obtained from the audited financials will also be used as part of the subrecipient’s risk assessment and scoring.

Should it be determined that the subrecipient has met the Single Audit threshold, notification will be provided to the subrecipient requesting a copy of a completed audit report be submitted to the County within 10 calendar days. If determined that the audit is required and it was not completed, the subrecipient will not be eligible for award of contract. If is determined that the single audit was not required, the County will continue to the standard pre-contracting procedures.

Any identified deficiencies outlined in the single audit will be required to be resolved within 30 days after the audit report issuance date. The subrecipient should also have a corrective action plan in place to respond to any identified deficiencies.

The audit cost should be charged to the federal award which is being conducted. If the single audit is conducted to more than one federal award with the subrecipient, the audit cost must be reasonably proportionate and shared among these Federal award § 200.506 § 200.425(a).

C. Written Standards

Subrecipients must establish and consistently apply written standards for providing ESG assistance. Standards must be established for each area covered by the subrecipient, including

the area over which the services are coordinated and provided to program participants. Subrecipients are required to submit copies of these standards in their annual funding application. Additionally, the County and ESG Subrecipients are required to comply with the Department of Housing and Urban Development (HUD) minimum standards relevant to ESG that are required by their Continuum of Care (COC). The standards must provide guidance related to the provision of ESG assistance and must be consistently applied to all program participants. The following minimum program standards are required for delivering the ESG program as outlined in 24 CFR Part 576:

1. Evaluating Eligibility for Assistance

Per the U.S. Department of Housing and Urban Development (HUD), Subrecipients are required to participate and comply with the COC coordinated entry process, also identified by HUD as the Coordinated Entry System (CES). The system identifies, assesses and prioritizes homeless individuals and families for housing and services based on vulnerability and severity of need. CES is designed to:

- Ensure that people experiencing homelessness receive the right housing intervention, and
- Prioritize people who need supportive housing the most to be able to access it as quickly as possible.

Without CES, people experiencing homelessness often face long wait times to receive assistance or are screened out altogether. Some of the most vulnerable people experiencing homelessness do not have the functional ability to check in routinely on wait lists, and to apply at multiple housing sites, necessary under a “first come, first served” process of accessing housing and services, and so are the least likely to be able to access housing without a CES process in place.

Coordinated entry is a community-wide approach that moves a homeless response system from a collection of independent housing and Subrecipients who employ their own referral policies and wait lists, to a comprehensive approach intended to coordinate all housing and service resources. In CES, providers work collectively to match people experiencing homelessness to an appropriate housing placement based on vulnerability and need.

CES simplifies the process by which homeless persons access housing and helps to ensure the right housing intervention is paired with the most appropriate participant. It is a data-driven process that allows communities to provide access to housing resources, to assess each individual or family who enters the homeless response system for their vulnerabilities and needs, to assign housing interventions based on client need, and to create a framework of accountability Subrecipients may choose to utilize a different intake and written system for victims of domestic violence, veterans or any other special population identified by HUD.

The minimum eligibility process will include an initial phone or in person screening to determine whether the applicant meets one of HUD’s categorical definitions of homeless or at risk of homelessness. An initial Pre-screening will be conducted by all CES Partners, then an intake and assessment will be completed by first entering persons who are homeless into the Homeless Management Information System (HMIS) which will include administering the Vulnerability Index - Service Prioritization Decision Assistance Tool (VI-SPDAT) as the assessment tool to assess and prioritize single individuals experiencing homelessness (the family version of the assessment, the F-VI-SPDAT, will be

used for families). Prioritization is based on vulnerability across five factors:

- (a) history of housing and homelessness
- (b) risks
- (c) socialization and daily functioning
- (d) wellness – including chronic health conditions, substance usage, mental illness, and trauma, and;
- (e) family unit (if applicable).

Referrals and Matching Services

The score on the VI-SPDAT helps guide the housing coordinator in making appropriate housing recommendations and referrals. Based on an individual's assessment, the housing coordinator will determine the best match for available resources. If an assessment:

- **Scores 0-3** Individuals or families who score between 0-3 on the VI-SPDAT will receive a referral for Affordable Housing (AH), along with potential referrals to population-specific housing resources, such as senior housing or veteran housing, depending on the individual's needs. It is important to note that housing intervention is not required at this time. However, if a family or veteran scores between 0-5, they may be eligible for Rapid Rehousing (RRH) programs. Families may also qualify for additional housing resources, such as CalWORKs housing programs, No Child Left Unsheltered (NCLU), or other mainstream resources. Veterans, on the other hand, may be eligible for Supportive Services for Veterans Families (SSVF), VA benefits, and other mainstream resources.
- **Scores 4-7** Individuals who score between 4-7 and families who score between 4-8 on the VI-SPDAT will receive a referral for Rapid Re-Housing (RRH), along with referrals to the Affordable Housing (AH) program and any applicable population-specific housing resources. If they meet the criteria for Chronically Homeless status (outlined below), they may also be eligible for Permanent Supportive Housing (PSH), based on availability. Specifically, clients who score for RRH and meet the following criteria should be referred to PSH programs: they must have been continuously homeless for one year or more or have experienced four episodes of homelessness within the last three years and have a diagnosable chronic disability.
- **Scores 8+ Individuals or 9+ Families**, a Permanent Supportive Housing (PSH) referral will be provided, along with referrals to the Affordable Housing (AH) program and any applicable population-specific housing resources, provided the individual has a diagnosable disability. If eligibility is confirmed, a more comprehensive assessment will be conducted in person by Subrecipient staff to verify the applicant's homeless status and determine which ESG service components they qualify for, addressing their housing needs. Eligibility determinations must be documented in the client's file, ideally with third-party documentation. If third-party verification is unavailable, intake worker observations or participant self-certification may be used, if due diligence by both staff and client is documented in the file.

When determining income limits for ESG programs, the "Extremely Low Income (ELI)" limits do **not** apply to ESG or CoC programs. Instead of using the ELI measure, ESG relies on the 30% of Area Median Income (AMI) limits to establish eligibility. The 30% AMI tables should be used for this purpose. HUD publishes these limits annually, and they can be accessed on the HUD USER website at <https://www.huduser.gov/portal/datasets/il.html>. The limits are located under the "Data" tab, in the fifth section titled "HUD 30% Income Limit for All Areas."

NOTE: FOR THE PURPOSES OF ESG-CV, PURSUANT TO CPD NOTICE 20-08, 21-08 MAXIMUM INCOME LIMITS OF UP TO 30% AMI HAVE BEEN WAIVED AND ARE CURRENTLY BELOW 50%.

Re-evaluations of eligibility for continued receipt of homelessness prevention and rapid re-housing assistance are required—every three (3) months for prevention and annually for rapid re-housing. Minimally, each re-evaluation of eligibility must verify that the client household does not have an annual income that exceeds thirty (30) percent of HUD determined median family income for the service area **and** the household continues to lack sufficient resources and support networks needed to retain housing without ESG assistance.

NOTE: FOR THE PURPOSES OF ESG-CV, HOMELESSNESS PREVENTION RE-EVALUATION MUST OCCUR AT LEAST ONCE EVERY 6 MONTHS AND RAPID REHOUSING RE-EVALUATION MUST OCCUR AT LEAST ONCE EVERY YEAR.

2. Targeting and Providing Essential Services Related to Street Outreach

Subrecipients are required to target unsheltered homeless individuals and/or families whose primary nighttime residence is a public or private place not meant for human habitation. It is recommended that preference be given to the chronically homeless and those special populations who are most vulnerable to being harmed by living in unsafe and unprotected places, i.e., victims of domestic and other forms of violence, youth, families with children, disabled, elderly, etc.

Engagement activities must include an initial assessment of needs and eligibility to prioritize the type and source of assistance required with safety and urgent health needs being the highest priority. Emergency health services, including mental health, can be funded with ESG only to the documented extent that other non-ESG funded appropriate health services are inaccessible or unavailable within the service area, or at the time of assessment. Based on need and assessment, qualifying individuals and/or families will be offered essential services beyond emergency health and other crisis intervention assistance that include case management, transportation, and housing stabilization.

3. Emergency Shelter Operations

Admission

Subrecipients must have written, standardized screening and intake criteria for determining eligibility for emergency shelter admission. These criteria must comply with Fair Housing Law and cannot require involuntary family separation by denying admission based on a child under 18. The admission process includes an initial assessment to determine the applicant's homeless status, based on HUD's four categorical definitions of homelessness (24 CFR 576.2), as well as any additional eligibility criteria set by the subrecipient. The assessment process and tools must align with the coordinated entry requirements of the service area's CoC (24 CFR 576.400(d)).

Diversion from Shelter

Based on screening results, individuals and families should be diverted when appropriate to the most stable housing available using the Housing First or Rapid Re-housing service models.

Essential Services and Referral

Emergency shelter participants must have access to essential services, either through direct service delivery by the Sub-recipient or by referral to other Subrecipients. Essential

services include, but are not limited to: case management, childcare, educational services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment, transportation, services for special populations, and access to mainstream income and health benefits when appropriate.

Length of Stay and Discharge

Essential services and shelter must be available to homeless individuals and families for the duration of time that ESG funds are providing shelter to the client. While typical stays are generally 90 days for emergency shelter and 30 days for motel vouchers, if a client requires an extended stay beyond the typical duration, case management notes must document the reason for the extended stay and provide an update to the housing plan.

Safety and Accommodations for Special Populations

Any shelter facility receiving ESG assistance for conversion, major rehabilitation, renovation, or operations must comply with all applicable federal, state, and local safety, sanitation, and accessibility standards, including the requirements outlined in 24 CFR 576.403.

Subrecipients must establish and implement written procedures and communication tools to ensure that individuals of any race, color, religion, sex (gender), national origin, familial status, or disability (mental or physical) who qualify for shelter and essential services are informed of and have access to these facilities and services. Reasonable accommodations must be provided for persons with disabilities to ensure they have an equal opportunity to utilize shelter and receive services. Some shelters may be required to meet additional accessibility standards under the Americans with Disabilities Act.

Victims of domestic violence and others in need of victim services must have access to a safe environment, with their identity protected. Subrecipients must implement procedures to maintain the confidentiality of records related to individuals receiving family violence prevention, treatment, or services. Additionally, subrecipients must certify that the address of any family or individual violence shelter will not be disclosed to the public without the shelter agency's permission.

Subrecipient emergency shelter policies and procedures must:

- Prohibit disclosing personally identifying victim information to any third party without consent of the victim;
- Ensure victim consent is reasonably time-limited, written and specific as to whom information will be shared; Identify and utilize an alternative HMIS to collect program data that will prevent the disclosure of personally identifying victim information; **and**
- Include confidentiality policies and procedures that require staff to refrain from discussing client information in public and ensure client records are secure and only accessible to authorized staff.

4. Assessing Needs for Essential Services Related to Emergency Shelter

Subrecipients are required to have a written standard assessment process and tool(s) that are applied to all eligible recipients of shelter essential services.

Shelter essential services include: case management; childcare; education services; employment assistance and job training; outpatient health services; legal services; life

skills training; mental health services; substance abuse treatment services; transportation; and services for special populations. Provision of services should be determined based on client need and in alignment with Sub-Recipient's targeted populations.

Provision of essential services and shelter must be available to shelter residents for at least the time during which the ESG funds are provided. Services do not need to be limited to a particular site if the site serves the same categories and types of homeless originally provided with essential services or serves homeless persons in the same service area where the Sub-recipient originally provided the services.

Based on the COC's centralized or coordinated assessment system, ESG the client will be assessed and prioritized using the Vulnerability Index – Service Prioritization Decision Assistance Tool (VI-SPDAT) assessment tool to determine an individual or family's need for emergency shelter or other ESG funded assistance.

The County of San Bernardino's COC developed written standards for CES pertaining to screening, assessment and referral of program participants in accordance with:

- 24 CFR Part 578 Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH Act): COC Program; Interim Final Rule;
- Emergency Solutions Grants Program (24 CFR 576);
- HUD's final rule on defining chronically homeless and homeless (24 CFR 91);
- HUD Notice CPD-14-012 on prioritizing persons experiencing chronic homelessness and other vulnerable homeless persons in permanent supportive housing and Recordkeeping Requirements for Documenting Chronic Homeless Status.

Coordinated Entry should achieve several goals:

- Make it easier for persons experiencing homelessness or a housing crisis to access the appropriate housing and service interventions;
- Prioritize persons with the longest histories of homelessness and the most extensive needs consistent with HUD Notice CPD-14-012 on prioritizing persons experiencing chronic homelessness and other vulnerable homeless persons in permanent supportive housing and Recordkeeping Requirements for Documenting Chronic Homeless Status;
- Lower barriers to entering programs or receiving assistance; and,
- Ensure that persons receive assistance and are housed as quickly as possible.

An initial intake and assessment will be completed by first entering persons who are homeless into the Homeless Management Information System (HMIS) which will include administering the VI-SPDAT as the assessment tool to assess and prioritize single individuals experiencing homelessness (the family version of the assessment, the F-VI-SPDAT, will be used for families). Prioritization is based on vulnerability across five components:

- (a) history of housing and homelessness;
- (b) risks;
- (c) socialization and daily functioning;
- (d) wellness – including chronic health conditions, substance usage, mental illness, and trauma, and;
- (e) family unit (if applicable).

5. Coordination Among Homeless Assistance Providers, Mainstream Subrecipients and Housing Providers

Continuums of Care are community-based homeless assistance program planning networks whose responsibilities include the promotion of access to and effective utilization of homeless and mainstream programs by the homeless. Subrecipients are required to be active members of their respective COC and contribute to the identification, development and coordination of resources that will promote and increase the efficiency and effectiveness of the community's homeless system.

Subrecipients must coordinate and integrate, to the extent possible, their ESG-funded assistance with other programs serving homeless and at-risk of homelessness people within their service area (refer to 24 CFR 576.400).

6. Determining and Prioritizing Eligibility for Homeless Prevention and Rapid Re-housing Assistance

Determination of eligibility for homeless prevention requires an in-person assessment (in compliance with COC coordinated entry process) to verify that applicants meet HUD's categorical definition for imminent risk of homelessness, homeless under other federal statutes, fleeing/attempting to flee domestic violence, or at-risk of homelessness **and** have an annual income below 30% of area median income (50% for ESG-CV). Homeless status and income eligibility must be documented in client files through third-party verification unless written justification is provided showing that due diligence was conducted substantiating that third-party was not available/accessible. Additionally, the assessment must indicate that prevention assistance would likely allow the applicant to regain stability in their current permanent housing or access other permanent housing and achieve stability.

Prioritization for homeless prevention assistance must comply with COC standards. Minimally, prioritization should align with vulnerable homeless and at-risk of homelessness populations identified in Sub-Recipient's service area homeless plan(s) and/or community assessment(s).

Determination of eligibility for rapid re-housing requires an initial assessment to verify that clients meet HUD's categorical definition for literally homeless or fleeing/attempting to flee domestic violence and are literally homeless. Homeless status must be documented in client files in accordance with HUD documentation standards with preference given to third-party verification where available.

Prioritization for rapid re-housing must comply with COC standards and be supported by subrecipient service area homeless plans and/or community assessment data. When appropriate, local prioritization should also align with HUD's and the County's homeless strategic plan goals for ending chronic homelessness, homelessness among Veterans, and families with children and youth homelessness, and homelessness among unaccompanied women.

7. Determining Client's Share of Rent and Utility Costs

Utility assistance is limited to 24 months within a 3-year period and can be used to pay the cost of utility deposits, utility arrears, and gas, electric, water and sewage services. Assistance can only be provided if the utility account is in the name of a member of the client household or there is documented proof of household responsibility for utility

payments.

Utility arrears assistance for homeless prevention requires a shut off notice and for rapid re-housing must result in utilities being turned on at the new permanent housing location.

8. Determining Duration and Amount of Rental Assistance Provided to Client

The duration of rental assistance is limited to twenty-four months within a 3-year time. Short-term assistance can be provided up to three (3) months and medium-term assistance is limited to twenty-four (24) months. The amount of rent assistance provided must be the least amount needed to stabilize clients in their permanent housing. Rent arrears assistance is defined as: past due rent owed to a current landlord.

9. Determining Type, Amount, and Duration of Housing Stabilization and/or Relocation Services Provided to Client

Type of Housing Stabilization and/or Relocation Services is limited to financial assistance costs and service costs, subject to the general conditions and restrictions identified under 24 CFR 576.103 and 576.104. Security deposits are limited to no more than 2 month's rent. A last month's rent must not exceed one month's rent and must be included in calculating the program participant's total rental assistance, which cannot exceed 24 months during any 3-year period. Utility payments are limited to up to 24 months per client, per service, including up to 6 months of arrears, per service. Eligible utility services are gas, electric, water, and sewage. No program participant shall receive more than 24 months of utility assistance within any 3-year period.

ESG funds may be used to pay cost of 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. This assistance cannot exceed 30 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.

Mediation services are allowable, provided that the mediation is necessary to prevent the program participant from losing the permanent housing in which the client currently resides. Legal services must be necessary to resolve a legal problem that prohibits the client from obtaining permanent housing or will likely result in the client losing the permanent housing in which they currently reside. Credit repair does not include the payment or modification of a debt.

Financial assistance cannot be provided to a client who is receiving the same type of assistance through other public sources or to a client who has been provided with replacement housing payments under the URA, during the period covered by the URA payments.

Except for housing stability case management, the total period for which any client may receive assistance must not exceed 24 months during any 3-year period. The limits on the assistance apply to the total assistance an individual receives, either as an individual or as part of a family.

D. HMIS Data Collection

All data on persons served and all activities funded with ESG must be entered into HMIS. The purpose of HMIS is to record and store client-level information about the numbers,

characteristics, and needs of homeless and at-risk homelessness persons who receive program assistance.

Domestic Violence Victim Subrecipients are prohibited from entering data in HMIS; however, they are required to maintain comparable databases of their own design which provide aggregate information and data consistent with HMIS data collection requirements. Projects serving survivors of domestic violence where the recipient is not a victim services provider are required to enter data in their HMIS.

Data entry requirements for shelters are:

Emergency or transitional shelters, day or mass shelters, or hotel/motel vouchers are required to collect data and report outcomes using the Entry/Exit method of data collection.

Shelters which meet the three criteria below may be set up in HMIS to use the Night-by-Night method of tracking shelter use:

- The shelter serves a large number of clients on a nightly basis;
- Clients are permitted to spend nights at the shelter on an irregular basis; and
- There is a high degree of client turnover.

Night-by-Night (NBN) shelters, which use a bed-night tracking method, will have a project start date for the night the client first stayed and will allow clients to re-enter as necessary without “exiting and restarting” for each stay for a specified period. Data collection involves recording, in HMIS, contacts with each person served. A contact is defined as the date of an interaction between a worker and a client designed to engage the client. All client contact must be recorded. Engagements must also be recorded. An engagement is an interaction which results in a formalized assessment or discussion. The date of engagement should be entered into HMIS at the point when the client has been engaged by the shelter worker.

With the NBN method:

- All data required to be collected, is collected at project entry; and
- The duration of each stay can be accurately aggregated to calculate each client’s total length of stay in the project.

Regardless of the method used to track shelter use, Subrecipients must be able to determine who and how many people were served by a shelter or shelter type for any given night, based on HMIS data.

For additional, detailed information about the reporting requirements, refer to the Emergency Solutions Grant Program (ESG) HMIS Program Manual at: <https://www.hudexchange.info/resources/documents/ESG-Program-HMIS-Manual.pdf>

E. Continuum of Care Coordination

Pursuant to 24 CFR 576.400, HUD requires collaboration between ESG recipients/subrecipients and Continuums of Care (COC) in planning, funding, implementing and evaluating homeless assistance and homelessness prevention programs, locally.

1. **Consultation with the COC** - The County must consult with the Continuum of Care to determine how to allocate ESG funds each program year; develop the performance standards for, and evaluate the outcomes of, projects and activities assisted by ESG funds; and develop funding, policies, and procedures for the administration and operation of the HMIS. 24 CFR 576.400(a).
2. **Coordination with other targeted homeless services** - Subrecipients are expected to coordinate and integrate, to the maximum extent practicable, ESG-funded activities with

other programs targeted to homeless people in the area covered by their COC and/or service area. These programs include (24 CFR 576.400 and 24 CFR 91.100) (d) (e) but are not exclusive to:

- (a) Supportive Housing Program
- (b) Section 8 Housing Choice Voucher Programs
- (c) Veterans Affairs Supportive Housing (VASH)
- (d) Healthcare for the Homeless
- (e) Projects for Assistance in Transition from Homelessness
- (f) Services in Supportive Housing Grants
- (g) Emergency Food and Shelter Program
- (h) Transitional Housing Assistance Grants for Victims of Sexual Assault, Domestic Violence, Dating Violence, and Stalking Program
- (i) Homeless Veterans Reintegration Program
- (j) VA Homeless Providers Grant and Per Diem Program
- (k) Health Care for Homeless Veterans Program
- (l) Supportive Services for Veteran Families Program
- (m) As well as mainstream housing, health, social services, employment, education, and youth programs for which families and individuals at risk of homelessness and homeless individuals and families may be eligible, such as:
 - (1) Public housing programs
 - (2) Housing programs receiving tenant-based or project-based assistance
 - (3) Supportive Housing for Persons with Disabilities
 - (4) HOME Investment Partnerships Program
 - (5) Temporary Assistance for Needy Families
 - (6) Health Center program
 - (7) State Children's Health Insurance Program
 - (8) Head Start
 - (9) Mental Health Services Act Programs
 - (10) Services funded under the Workforce Investment Act.

Since Subrecipients are required to be active participants in their respective COC and comply with Program Standard #5—*Coordination Among Homeless Assistance Providers, Mainstream Subrecipients and Housing Providers*. Active participation in the CoC assists with ensuring the coordination Subrecipients and is demonstrated through the provider membership in and attendance of: 1) the County's Continuum of Care (CoC) Board - which serves as the HUD-designated primary decision-making group and oversight Council for the County's CoC; and 2) the Homeless Providers Network (HPN), which provides a forum and environment where collaborative public and private non-profit Subrecipients and faith-based organization can work together to improve the current delivery of available homeless-related resources. Both entities are comprised of members of organization that provide homeless-related services, elected officials, faith-based organizations, workforce development, academic/educational institutions, etc.

To document compliance with 24 CFR 576.400, on a bi-annual basis, the County will coordinate with the CoC board to obtain membership rosters, agenda, meeting minutes, attendance logs, etc. to ensure ESG Subrecipients are actively attending and participating in CoC meetings and to document the collaboration of related to:

- Funding allocations
- Development of performance standards
- Evaluation of evaluate the outcomes of projects and activities assisted by ESG funds.
- Development of funding, policies, and procedures for the administration and operation of the HMIS and CES.

F. Homeless Participation Requirement

Pursuant to Homeless Participation 24 CFR §576.405 ESG programs must provide:

- (a) Provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policy-making entity of the recipient, to the extent that the entity considers and makes policies and decisions regarding any facilities, services, or other assistance that receive funding under Emergency Solutions Grant (ESG).
- (b) If recipient is unable to meet requirement under paragraph a, it must develop and implement a plan to consult with homeless or formerly homeless individuals in considering and making policies and decisions regarding any facilities, services, or other assistance that receive funding under Emergency Solutions Grant (ESG). The plan must be included in the annual action plan required under 24 CFR 91.220; or
- (c) To the maximum extent practicable, the recipient or ESG programs must involve homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under ESG, in providing services assisted under ESG, and in providing services for occupants of facilities assisted under ESG. This involvement may include employment or volunteer services.

The County's policy-making body and oversight for the County's Continuum of Care is the CoC Board which is the legislative unit of the CoC. The County requires its departments serving as Administrative Entities for HUD-funded programs, as well as its agencies receiving ESG funding to participate in the CoC. The CoC Board requires its board composition to be comprised of at least one current or previously homeless board member, the extent feasibly possible.

CoC Board serves as the HUD-designated primary decision-making group and oversight council for the County's CoC. CoC Board is comprised of homeless service providers, faith-based organizations, community-based organizations, etc., the CoC requires that at least one of the active Board member positions is seated by a homeless, or formerly homeless representative. The County's administration of and active participation in CoC, which is and has been comprised of at least one current or formerly homeless member, fulfills 576.405.

The CoC Board members are responsible for making policies, funding decisions, and other programmatic determinations related to HUD-funded homeless services and programs (i.e., CoC and ESG). The CoC Board meets monthly, when practically feasible, and is an open public meeting. In accordance with 576.405, the County must document its compliance. Annually, the County will document do so by obtaining a certification from by the CoC Board Chair or Vice-Chair attesting that at least one Board members met the current or former homeless requirement and identifies their dates of service as a voting member of the Board. If the Chair of Vice-Chair is unable to certify the homeless participation requirement has been met, it is at that time a plan will be developed as an alternate method of with homeless or formerly homeless individuals in considering and making policies and decisions regarding any facilities, services, or other assistance that receive funding under Emergency Solutions Grant (ESG).

In addition, with 576.405, ESG Subrecipients will be held to the same requirement, to the

extent feasible. Annually, the Subrecipients must submit a Homelessness Participation Certification (Attachment E), verifying the participation of a currently or formerly homeless (as stated in the regulation) on their board of directors or policy-making entity of their organization and the involvement of homeless individuals and families in construction, renovating, maintaining, and operating facilities assisted under ESG, in providing services assisted under ESG, and in providing services for occupants of facilities assisted under ESG. This involvement may include employment or volunteer services. If the Subrecipient is unable to certify such, they must complete the form identifying the efforts that will be taken to do so.

II. Client Eligibility

A. Assessment

All applicants must be assessed to determine eligibility for receipt of ESG funded services and assistance. The initial evaluation of participants includes the determination of the amount and types of assistance the individual or family needs to regain stability in permanent housing and the evaluation will be conducted in accordance with the coordinated assessment requirements set forth under 24 CFR 576.400 (d) and the written standards established under 24 CFR 576.400 (e).

Furthermore, assessments must include the requirements described at 24 CFR 576.401(d), which say that “The recipient and its subrecipients must assist each program participant, as needed, to obtain:

- (1) Appropriate supportive services, including assistance in obtaining permanent housing, medical health treatment, mental health treatment, counseling, supervision, and other services essential for achieving independent living; and
- (2) Other Federal, State, local, and private assistance available to assist the program participant in obtaining housing stability as described under this regulation.

Other service costs associated with applicants determined to be ineligible for ESG assistance are not allowable including follow-up and case management.

Subrecipients, upon receiving client referral from CES, must conduct a complete and comprehensive housing assessment with the household (HH). The assessment will function as the basis for creating the “Housing Plan” which serves as the foundation for resource coordination and resolution of the housing crisis. Each HH should have a copy of the screening assessment in the client file. Housing assessments may be completed through HMIS and a printed, hard copy kept in the client file.

1. Household Composition

Homeless or at-risk of homelessness households who meet one or more of HUD determined categorical homeless definitions or criteria are eligible to receive program assistance. Household composition includes an individual living alone, family with or without children, or a group of individuals who are living together as one economic unit. In all cases a household must lack sufficient resources and support networks necessary to obtain or retain housing without the provision of ESG assistance to be program eligible.

Each client file must contain documentation for all HH members when receiving assistance.

The documentation must substantiate identification and can be copies of:

- (a) Driver's license and
- (b) Social Security card
- (c) Medi-Cal Card for children (if no other identification exists)
- (d) Birth Certificate
- (e) Passport
- (f) Naturalization papers
- (g) U.S. military discharge papers (DD-214)
- (h) Adoption papers
- (i) Custody agreement
- (j) Affidavit of parentage (a written statement of parent concerning child)
- (k) Guardianship papers

2. Household Status

The type of ESG assistance for which an eligible household qualifies is determined by the stability of their current housing or their homeless status. The Subrecipient Case Manager must complete the Homeless or At-Risk of Homelessness Certification indicating current living situation and provide the appropriate documentation as indicated on the Homeless Status Certification Form (Attachment F). A copy of this certification must be retained in the client file. To receive services clients, meet one of the homeless or at risk of homeless definitions as expounded in subsections B and C of this Client Eligibility section. In addition to determining homeless status/definition category of homelessness in which the client falls MUST be identified (i.e., Category 1 – Literally Homeless; Category 2- At Risk of Homelessness, etc.)

To ensure compliance with the homeless definition in 576.2, documentation at intake of the evidence relied upon to establish and verify homeless status must be provided and retained in client file. The established order of priority for obtaining evidence is as follows every attempt, where feasible, must be made to follow this order of priority:

- (a) Third-party verification- referral from CES or a certifying letter written on letterhead from another Agency qualified to make a determination of homeless status, may be submitted as third-party verification.
- (b) Written case worker or intake worker observation- a written statement by the case worker or intake worker may be an option ONLY if third party documentation and verification are unable to be obtained.
- (c) Written observations must be well-documented including date, time and efforts made to verify homeless status (i.e., date and time homeless location was visited, where visited, observed evidence of homelessness, who/ what witnesses, if any, were interviewed to verify homeless status, etc.).
- (d) Self-Certification – a statement from the party seeking assistance may provide a well-documented statement certifying homelessness ONLY when options a) and b) above are not feasible. The statement must include dates/duration of homelessness, circumstances leading to homelessness, current place of residence (i.e., La Merc Park residing in storm drain, etc.), lack financial resources and support system, etc.
- (e) As a justification for using self-certification, case workers MUST document all attempts to obtain third-party verification and must document why they were unable to provide written observation of homeless status.

- (f) Self-certifications are last resort, not first resort. If proper documentation to verify homeless status does not exist, the client may be deemed an ineligible client and may affect the County's ability to reimburse for services rendered.

B. Categorical Homeless Definitions and Criteria

Eligible applicants for program services must meet one of the following categorical definitions of homeless or criteria for being at-risk of homelessness:

Category 1: Literally homeless --a household that lacks a fixed, regular, and adequate nighttime residence, meaning:

- Living in a primary nighttime residence that is a public or private place not designed for or ordinarily used for as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground); **or**
- Living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); **or**
- Exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering the institution.
- Eligible activities: **Emergency Shelter, Street Outreach, Rapid Rehousing, HMIS**

Category 2: Imminent risk of homelessness --a household that will imminently lose their primary nighttime residence, provided that:

- The residence will be lost within 14 days of the date of application for homeless assistance; **and**
- No subsequent residence has been identified; **and**
- The household lacks the resources or support networks needed to obtain other permanent housing.
- Eligible activities: **Emergency Shelter, Homelessness Prevention, HMIS**

Category 3: Homeless Under Other Federal Statutes -- Unaccompanied youth under 25 years of age, or family who do not otherwise qualify as literally homeless or imminent risk of homelessness, but who:

- Are defined as homeless under Section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b (h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a); **and**
- Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance; **and**
- Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; **and**
- Can be expected to continue in such status for an extended period because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the

presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.

- Eligible Activities: **Emergency Shelter, Homelessness Prevention, HMIS**

Category 4: Fleeing, or attempting to flee, domestic violence a household who:

- Is fleeing, or is 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, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence; and
- Has no other residence; **and**
- Lacks the resources or support networks to obtain other permanent housing.
- Eligible activities: **Emergency Shelter, Street Outreach, Homelessness Prevention, HMIS**

C. Criteria for At Risk of Homelessness Qualification

Applicants for program services for at-risk individuals or households must meet the following definition of At Risk of Homelessness:

- Have an annual income below 30% of median household income for the area; and
- Do 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** meet one of the following conditions:
- Has moved because of economic reasons two 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 in writing 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 two 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 (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); **or**
- Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the approved Consolidated Plan for the County of San Bernardino.

A youth who does not qualify as homeless under the above eligibility criteria, is eligible if they:

- Qualify as "homeless" under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A))m section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); **or**
- Qualify as "homeless" under section 725(2) of the McKinney-Vento Homeless Assistance

Act (42 U.S.C. 11434a (2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

- Eligible activities: **Homelessness Prevention, HMIS**

D. Criteria for Chronically Homeless Qualification

Chronically homeless means:

- (a) A “homeless individual with a disability,” as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:
 - (1) Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; **and**
 - (2) Has been homeless and living as described in paragraph (1) (I) of this definition continuously for at least 12 months or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (1) (I). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility;
- (b) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all the criteria in paragraph (1) of this definition, before entering that facility; **or**
- (c) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all the criteria in paragraph (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

Evidence of chronically homeless individuals must be kept in the program participant file to demonstrate that an individual or family met the definition of “chronically homeless” at the point of entry into a program.

E. Income Determination and Requirements

1) Income Eligibility

Homeless prevention assistance requires applicants to be below 30% AMI at time of intake. Homelessness Prevention program participants must be re-evaluated not less than once every three months **(or every six months for ESG-CV)**.

Rapid re-housing does not have income eligibility requirements at the time of intake; however, to qualify for continuation of rapid re-housing assistance, an applicant must have an annual income below 30% AMI at the time of re-evaluation **(below 50% for ESG-CV)**. There are no other initial income eligibility requirements to receive program services. Rapid Re-Housing program participants must be re-evaluated not less than once annually.

NOTE: In accordance with current waivers and alternate requirements under the CARES Act for ESG COVID notices CPD 20-08 and CPD 21-08 income limits have increase to 50% AMI for Homeless Prevention and Rapid Rehousing for applicants utilizing ESG resources to prevent, prepare for and respond to coronavirus (COVID-19).

2) Calculating Gross Annual Income

Annual Income is the gross amount of income anticipated to be received by a household during the coming year based on the household's circumstances at the time of program intake and assessment. Annual income includes, but is not limited to: the full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses and other compensation for personal services. A simple tool HUD has readily available on the HUD Exchange website is the Income Eligibility Calculator <https://www.hudexchange.info/incomecalculator/>. It is an interactive tool that makes determining the income eligibility and assistance amounts for beneficiaries easy. Annual Income determination is consistent with 24 CFR 5.609, also known as Part 5 and the HUD ESG Income Limits.

The Income Calculation Worksheet (Attachment G), must be completed and a copy kept in the client file, at intake, every three (3) months for homeless prevention and annually for rapid re-housing assistance, to determine eligibility for ESG assistance. To be eligible, the gross annual HH income must be at or below thirty percent (30%) AMI (**below 50% AMI for ESG-CV**). Income is annualized to project gross annual income in accordance.

3) Verification Tracking of Income

Case manager must record all attempts, such as phone logs, email correspondence, and copies of certified letters, etc., to obtain required verifications in the order specified on the Verification Tracking of Income form (Attachment H). Staff must provide an explanation detailing outcomes, including obstacles, on the form, if utilizing verification out of the hierarchy sequence. All sources of HH income, for all adult members, must be verified and documented at the following intervals and with the following eligibility criteria:

- Homelessness Prevention – at intake and every three (3) months (every 6 months for ESG-CV)
 - HH must be below 30% ESG income requirements for ESG. Please note: 30% income limits differ from those of 30% income limits for other HUD programs. On an annual basis, the County will provide to its Subrecipients updated ESG Income Limits, Fair Market Rents (FMR) and Utility Schedules, as they become available. However, it is recommended that Subrecipients ensure to refer to the HUD Exchange website for the most recent income limits.
 - HH must be below 50% AMI for ESG-CV.
- Rapid Re-housing – at intake and annually, at recertification.
 - There are no income restrictions at intake for rapid rehousing assistance; however, at recertification, the 30% HH income requirement applies. Recertifications must be conducted at least once per year and the under 50% AMI requirement must be met at the time of recertification for ESG-CV.
 - As with homeless status, income must be documented. The verification of tracking income form is an addendum to the Homeless Status Certification Form. Verification must be conducted in the same order of priority:
- Third-party verification
 - Some examples of common acceptable documentation:
 - Earned Income – pay stubs, previously filed taxes, bank statements, etc.
 - Unearned Income – statements from government official/agency, unemployment or disability pay stubs, most recent benefit or

disability income notice from agency

- Written observation
 - If third-party verification is not available, a case worker may verify income by calling respective agencies to obtain a verbal verification which is in turn documented.
- Self-certification
 - If income verification is not available via third-party verification or written observation then as a last resort, the client may self-certify income. THIS MUST BE A LAST RESORT. In addition to the Self-Certification, the case worker must document, in detail, all attempts made to obtain third-party or written observation verifications. The documented attempts must include dates and times of phone calls made, emails/letters/or form requests sent, who was contacted and results of contact.

When working with ESG program income limits, please be aware of the following key points:

- **Extremely Low Income vs. Area Median Income Limits** - The "Extremely Low Income (ELI)" limits do NOT apply to the ESG or CoC programs. ESG uses the 30% of Area Median Income (AMI) limits to establish eligibility, not the ELI measure. Please refer to the 30% AMI tables. If ESG recipients or subrecipients were to use the ELI standard, some applicants might incorrectly be deemed eligible for homelessness prevention assistance, even though their incomes exceed 30% AMI.

Under the ESG program, income eligibility is based on the HUD income limits in effect at the time of income verification. Income eligibility is not based on HUD income limits that correspond with the grant year under which the ESG funds were awarded.

When working with ESG-CV, the increased income limits of up to 50% AMI apply.

- **Rapid Re-Housing Income Requirements** - Please keep in mind for program participants receiving ESG and ESG- CV "Rapid Re-Housing" assistance, an income assessment is not required at initial evaluation. At re-evaluation - which must take place not less than once annually for rapid re-housing - the participant's household must have an annual income that does not exceed 30 percent of median family income for the area, as determined by HUD for ESG and 50 percent for ESG-CV.
- **Homelessness Prevention Income Requirements** – The ESG Program interim rule limits eligibility for homelessness prevention assistance to individuals and families with incomes below 30 percent of AMI at intake and incomes that do not exceed 30 percent of AMI at re-evaluation, which must take place not less than once every 3 months. However, ESG-CV is subject to waivers as implemented in CPD Notice 20-08 and 21-08 which allow incomes to not exceed 50% AMI and for re-evaluations to be conducted not less than once every six months.

When determining the annual income of a household to establish eligibility for ESG assistance, Subrecipient must count the income of all adults in the household, including nonrelated individuals, within the limitations imposed by 24 CFR 5.609. Not everyone living in the unit is considered a member of the household for the purposes of determining a household's income. Excluded persons include: foster children, foster adults, live-in aides, children of live-in aides and an unborn child. A child subject to a shared-custody agreement should be counted as a household member if the child

resides with the household at least 50 percent of the time.

Income generated by an asset, such as the interest on a savings or checking account is considered household income even if the household elects not to receive it. For example, though an applicant may elect to reinvest the interest or dividends from an asset, the interest or dividends are still counted as income anticipated to be received during the coming 12 months. Asset income is discussed in 24 CFR 5.609. Income producing assets include: bank accounts; life insurance policies; lump sum additions (legal settlement, refund, etc.); personal property held as investments; retirement/pension funds; trusts; assets disposed of for less than fair market value; and stocks, bonds or mutual funds.

F. Eligibility Documentation and Recordkeeping

Subrecipients must establish written intake procedures that indicate the order of priority for obtaining evidence of homeless status which is to include requirement of written documentation verifying eligibility for program services in accordance with the following preferred order of documentation this applies to aspects of the program requiring verifications:

Third-Party Verification — source documents provided by an outside source.

Third party documentation is the preferable form of verification and includes but is not exclusive to written statement or document from employer, landlord, public benefit worker, or agency Subrecipient. Written verification sent directly to program staff or via the applicant is preferred.

Intake/Case Manager Worker Observation—documented by subrecipient staff.

Staff documentation may include oral statements made by a social worker, case manager, or other appropriate official at an institution, shelter, or other facility and documented by the program intake worker/case manager. Use of oral statements is allowable when third- party documentation is not available.

Participant Self-certification—applicant signed document certifying eligibility.

Self-certification requires a written and signed document by the individual or head of household seeking assistance attesting to the eligibility facts for which they are certifying. A third party may be designated by a participant to sign documents on their behalf when they are unable to do so. If needed, Subrecipient must provide access to language interpretation services and assistive devices necessary for participants to understand the documents they are certifying.

Self-certification documentation is only used when documented staff efforts verify that third-party or worker observation documentation is not available. However, lack of third- party documentation must not prevent an individual or household from being immediately admitted to emergency shelter, receiving street outreach services or immediately accessing domestic violence/victim service shelter and assistance.

Documentation verifying eligibility must be available in client files or if kept electronically, available upon request. See the appendices in this manual for examples of appropriate documentation of applicant eligibility.

In accordance with the Coronavirus Aid, Relief, and Economic Security Act of 2020, youth aged 24 and under seeking assistance shall not be required to provide third party documentation to establish their homeless status. In addition, the County does not require program participants to receive treatment or perform any prerequisite activities as a condition for

receiving assistance provided by ESG-CV funds. (Notice CPD-21-08 Section III.F.12)

Households receiving Prevention or Rapid Re-Housing assistance, **must** have the following clearly noted and documented in the household's case file:

1. Eligibility Determination:

The household **must** receive an initial consultation and eligibility assessment to determine income and housing status eligibility, and the appropriate type of assistance needed to regain stability in permanent housing.

2. Assistance in obtaining mainstream and other resources:

The household **must** receive appropriate supportive services and referrals essential to achieving independent living through other federal, state, local, and private assistance.

3. Housing stability plan to include:

- a. Needs assessment to include specific housing and self-sufficiency goals; and,
- b. Action steps to retain permanent housing after ESG-CV assistance ends.

DETAILED RECORDKEEPING REQUIREMENTS FOR INDIVIDUALS AND FAMILIES QUALIFYING UNDER THE HOMELESS DEFINITION

Program participants who qualified as homeless because their primary nighttime residence was a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground, or because they were living in a supervised shelter designed to provide temporary living arrangements, one of the following must be obtained and maintained in the program participant files:

- (a) a written referral by another housing or service provider;
- (b) a printed record from HMIS or a comparable database used by a victim service or legal service provider;
- (c) a written observation by an outreach worker of the conditions where the individual or family was living; or
- (d) a written certification by the individual or head of household seeking assistance.

Program participants who qualified as homeless because they were exiting an institution where they resided for 90 days or less and had resided in an emergency shelter or place not meant for human habitation immediately before entering that institution, does a review of program participant files confirm that they were in the institution 90 days or less as evidenced by:

- (a) discharge paperwork or written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution, or
- (b) a written record of the intake worker's due diligence in attempting to obtain the information above and a written certification by the individual seeking assistance that stated he or she is exiting (or has just exited) the institution where he or she resided for 90 days or less.

Program participants who qualified as homeless because their primary nighttime residence was a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground, or because they were living in a supervised shelter designed to provide temporary living arrangements, one of the following must be obtained and maintained in the program participant files: a written referral by another housing or

service provider;

- (a) a printed record from HMIS or a comparable database used by a victim service or legal service provider;
- (b) a written observation by an outreach worker of the conditions where the individual or family was living; or
- (c) a written certification by the individual or head of household seeking assistance.

Program participants who qualified under paragraph (2) of the homeless definition in 24 CFR 576.2, one of the following must be obtained and maintained in the program participant files that evidences that program participants would have lost their primary nighttime residence (including housing they own, rent, or share with others) within 14 days of the date of application for homeless assistance:

- (a) a court order resulting from an eviction action notifying the individual or family that they must leave within 14 days of the date of their application for homeless assistance, or the equivalent notice under state law; a Notice to Quit, or a Notice to Terminate issued under state law;
- (b) if the primary nighttime residence was a hotel or motel room not paid for by federal, state, or local government programs for low-income program participants or by charitable organizations, evidence that the individual or family lacked the resources necessary to reside there for more than 14 days from the date of application for homeless assistance; or
- (c) an oral statement by the individual or head of household seeking assistance that the owner or renter of the housing in which they currently reside will not allow them to stay for more than 14 days from the date of application for homeless assistance? The statement must be documented by the intake worker. Also, the oral statement was found credible by one of the following:
 - (1) a written certification by the owner or renter of the housing or the intake worker's documentation of the owner or renter's oral statement, or
 - (2) if the owner or renter of the housing cannot be reached, a written description and certification of the intake worker's due diligence in contacting the owner or renter and a written certification by the head of household seeking the assistance that their statement is true and complete.

Program participants who qualified under paragraph (2) of the homeless definition in 24 CFR 576.2, the program participant file must contain:

- (a) certification from the individual or head of household that no subsequent residence has been identified; and
- (b) certification or other written documentation that the individual or family lacks the resources or support networks to obtain other permanent housing.

Youth and families who qualified under paragraph (3) of the homeless definition in 24 CFR 576.2, the program participant files must confirm that the unaccompanied youth or family with children and youth met the homeless definition of another federal statute as evidenced by a certification of homeless status signed by the local private nonprofit organization or state or local governmental entity responsible for administering assistance under that statute.

Youth and families who qualified under paragraph (3) of the homeless definition in 24 CFR 576.2, program participant files must confirm that the program participants did not have a lease, ownership interest, or occupancy agreement in permanent housing at any time during

the 60 days immediately preceding the date of application for homeless assistance, as evidenced by the following:

- (a) written certification by the head of household seeking assistance, or
- (b) written observation by an outreach worker, or
- (c) referral by a housing or service provider

Youth and families who qualified under paragraph (3) of the homeless definition in 24 CFR 576.2, program participant files must indicate that each program participant's records contain a written self-certification that the program participant moved two or more times during the 60-day period immediately before the program participant applied for homeless assistance AND one or more of the following documentation, as applicable, to support the self-certification:

- (a) recorded statements or records obtained from each owner or renter of housing; provider of shelter or housing; or social worker, case worker; or other appropriate official of a hospital or institution in which the individual or family resided;
- (b) a written record of the intake worker's due diligence in attempting to obtain the above records;
- (c) where a move was due to the individual or family fleeing domestic violence, dating violence, sexual assault, or stalking, written self-certification that they were fleeing that situation, and they resided at that address.

Youth and families who qualified under paragraph (3) of the homeless definition in 24 CFR 576.2, program participant files must confirm that the program participants' persistent instability was likely to continue for an extended period of time because of: chronic disabilities; chronic physical health or mental health conditions; substance addiction; histories of domestic violence or dating violence or childhood abuse; the presence of a child or youth with a disability; two or more barriers to employment (including lack of high school degree or GED; illiteracy; low English proficiency; a history of incarceration; or detention for criminal activity; and/or a history of unstable employment) as evidenced by:

- (a) for chronic disabilities, chronic physical health or mental health conditions, and substance addiction – a written diagnosis from a professional who is licensed by the state to diagnose or treat those conditions; or
- (b) for barriers to employment – employment records, literacy or English proficiency tests, department of corrections records; or
- (c) any other reasonable documentation of any of the conditions in the criteria.

Program participants qualified under paragraph (4) of the definition of homeless in 24 CFR 576.2 and was served by a victim service provider, the records must show that either the program participant or the intake worker certified in writing that the individual or head of household made an oral statement that the program participant was:

- (a) was fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence;
- (b) lacked the resources or support networks necessary to obtain other housing; and
- (c) had not identified a subsequent residence.

Program participant qualified under paragraph (4) of the definition of homeless in 24 CFR 576.2 and was served by an organization that is not a victim service provider, do the records contain the required documentation and support for the program participant's oral statement that the individual or family:

- a) was fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence;
- b) lacked the resources or support networks needed to obtain other permanent housing; and
- c) had no other subsequent residence identified.

NOTE: The documentation of the program participant’s oral statement must include:

- (1) a written certification by the head of household that the oral statement is true and complete; and
- (2) a written observation of the intake worker or a written referral by a housing or service provider, legal assistance provider, social worker, health-care provider, law enforcement agency, pastoral counselor, or any other organization from whom the program participant had sought assistance for domestic violence, dating violence, sexual assault, or stalking. (This written referral or observation need only include the minimum amount of information required to document that the individual or family is fleeing domestic violence, dating violence, sexual assault or stalking and is not required if obtaining or maintaining this information would have jeopardized the program participant’s health or safety.)

DETAILED RECORDKEEPING REQUIREMENTS FOR INDIVIDUALS AND FAMILIES QUALIFYING UNDER AT-RISK OF HOMELESSNESS DEFINITION

Program participants qualified as at-risk of homelessness under paragraph (1) of the definition in 24 CFR 576.2, the records must reflect that the household’s income is below 30 percent of the area median income, as evidenced by an income evaluation form containing HUD’s minimum requirements, and at least one of the following:

- (a) source documents for the assets held by the program participant and source document of the income received over the most recent period for which representative data are available before the date of intake; or
- (b) written statement by the relevant third party (e.g., employer) or the written certification by the recipient’s or subrecipient’s intake staff of the oral verification by the relevant third party of the income the program participant received over the most recent period for which representative data are available; or
- (c) written certification by the program participant of the amount of income the program participant received for the most recent period representative of the income that the program participant was reasonably expected to receive over the 3-month period following the evaluation?

Program participants qualified as at-risk of homelessness under paragraph (1) of the definition in 24 CFR 576.2, the records must reflect the program participant’s written certification that the program participant has insufficient financial resources and support networks immediately available to attain housing stability and meets one or more of the conditions under paragraph (1)(iii) of the “at risk of homelessness” definition.

Program participants qualified as at-risk of homelessness under paragraph (1) of the definition in 24 CFR 576.2, the records must show reasonable efforts to verify that the program participant met one of the seven conditions under paragraph (1)(iii), as evidenced by one of the following:

- (a) source documents that evidence one or more of the conditions;
- (b) a written statement by the relevant third party or the written certification by the recipient’s/subrecipient’s intake staff of the oral verification by the relevant third party

- that the applicant meets one or more of the conditions; or
- (c) a written statement by the recipient's or subrecipient's intake staff that the staff person has visited the applicant's residence and determined that the applicant meets one or more of the conditions or, if a visit is not feasible or relevant to the determination, a written statement by the recipient's/subrecipient's staff describing the efforts taken to obtain the required evidence?

NOTE: The conditions are:

- (1) has moved because of economic reasons two or more times during the 60 days immediately preceding the application for assistance;
- (2) is living in the home of another because of economic hardship;
- (3) has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of the application for assistance;
- (4) lives in a hotel or motel and the cost are not paid by charitable organizations, federal, state, or local government programs for low-income individuals;
- (5) lives in an SRO or efficiency apartment in which there resides more than two persons or lives in a larger housing unit in which there resides more than 1.5 persons per room, as defined by the U.S. Census Bureau;
- (6) is exiting a publicly funded institution, or system of care, or
- (7) otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness as identified in the County's Consolidated Plan.

Program participants qualified as at-risk of homelessness under paragraph (2) in 24 CFR 576.2, the records must reflect that the program participant met the definition of homeless under one of the following federal statutes, as evidenced by a certification of the child or youth's homeless status by the agency or organization responsible for administering assistance under the statute:

- (a) Runaway and Homeless Youth Act;
- (b) Head Start Act;
- (c) Subtitle N of the Violence Against Women Act of 1994;
- (d) Section 330 of the Public Health Service Act;
- (e) The Food and Nutrition Act of 2008;
- (f) Section 17 of the Child Nutrition Act of 1966.

Program participants qualified as at-risk of homelessness under paragraph (3) in 24 CFR 576.2, the records must reflect that the child or youth in the household qualified as homeless under subtitle B of title VII of the McKinney-Vento Homeless Assistance Act, as evidenced by certification of the child or youth's homeless status by an agency or organization that administers assistance under the Education for Homeless Children and Youth Program.

NOTE: Under this paragraph of At-Risk of Homelessness, the certification need only specify that the child or youth meets the definition under subtitle B of title VII of the McKinney-Vento Homeless Assistance Act.

III. Allowable Program Service Components and Activities

Service Components and Homeless Eligibility

ESG funds can pay for five program service components: Street Outreach; Emergency Shelter; Homelessness Prevention; Rapid Re-housing; and Homeless Management Information System

(HMIS). The following chart shows which service components are available for homeless and/or at-risk households as defined in the Program Components and Program Requirements (Attachment I):

- (a) Street Outreach;
- (b) Emergency Shelter;
- (c) Homelessness Prevention;
- (d) Rapid Re-housing; and
- (e) HMIS

Each Subrecipient contract will identify in the recitals what services the provider is eligible to provide under the program, in addition, the agreements will identify the eligible activity by name and regulation number for the services that are being provided by the service provide as reflected on the Eligible Uses, Budget Summary and Accomplishment Goals (Attachment J). In addition, the eligible uses of each activity are clearly spelled out in the see Program Components attachment, also incorporated into the service agreement between the County and the Subrecipient.

A. Street Outreach

Street outreach is service delivery for the specific purpose of reaching out to unsheltered homeless people; connecting them with emergency shelter, housing, or critical services; and providing urgent, non-facility-based care. Street outreach must be provided in accordance with Program Standard #2—*Targeting and Providing Essential Services Related to Street Outreach*.

Individuals defined as unsheltered must meet the criteria for: Category 1, literally homeless; or Category 4, fleeing/attempting to flee domestic violence (where the individual or household also meet the criteria for category 1); and are:

- living on the streets (or other places not meant for human habitation); **and**
- unwilling or unable to access services in emergency shelter.

1) Essential Services

Engagement Services

Engagement Services are activities to locate, identify, and build relationships with unsheltered homeless people to offer immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and other housing programs. Eligible costs include:

- Conducting an initial assessment of applicant needs and eligibility;
- Providing crisis counseling;
- Addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries;
- Actively connecting and providing information and referrals to needed services; **and**
- Cell phone costs of outreach workers.

Case Management

Case Management activities to assess housing and service needs and arrange, coordinate and/or monitor the delivery of individualized services. Eligible costs include:

- Assessment and intake including using coordinated entry;
- Conducting initial evaluations including, verifying and documenting eligibility;

- Counseling;
- Developing/securing/coordinating services;
- Helping obtain Federal, State, and local benefits;
- Monitoring and evaluating program participant progress;
- Providing information and referrals to other providers; **and**
- Developing an individualized housing stabilization plan that leads to the attainment of stable permanent housing.

Emergency Health

Emergency health services are eligible activities to the extent that other appropriate services and treatment are unavailable or inaccessible within the community. An example of customary emergency health services is outpatient treatment of urgent medical conditions by licensed medical professionals in community-based settings (e.g., streets, parks, and campgrounds) to those eligible participants unwilling or unable to access emergency shelter or an appropriate healthcare facility. Eligible costs include:

- Assessing health problems and developing treatment plans;
- Assistance in understanding health needs;
- Providing directly or assisting to obtain appropriate emergency medical treatment; **and**
- Providing medication and follow-up services.

Emergency Mental Health

Emergency mental health services are eligible activities to the extent that other appropriate services and treatment are unavailable or inaccessible within the community; i.e., outpatient treatment of urgent mental health conditions by licensed professionals in community-based setting (e.g.; streets, parks, and campgrounds) to those eligible participants unable or unwilling to access emergency shelter or an appropriate health care facility. Eligible costs include:

- Crisis intervention;
- Prescription of psychotropic medications;
- Explanation about the use and management of medications; **and**
- Combinations of therapeutic approaches to address multiple problems.

Transportation

Travel expenses incurred by outreach workers, social workers, medical professionals or other service agency employees during the provision of allowable street outreach services are eligible costs. They include:

- Transporting unsheltered people to emergency shelters or other service facilities;
- Public transportation for participants;
- Mileage allowance for outreach workers using their own vehicles to visit program participants;
- Purchasing or leasing a vehicle for use in conducting outreach activities, including the cost of gas, insurance, taxes, and maintenance for the vehicle; **and**
- Costs of staff to accompany or assist program participants to use public transportation.

2) Services for Special Populations

Services for special populations are essential services that have been tailored to address

the special needs of homeless youths, victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers, domestic violence shelters, and other organizations that serve persons who meet the HUD homeless definition and have special needs. Eligible costs include:

- Engagement;
- Case Management;
- Emergency Health Services;
- Emergency Mental Health Services; **and**
- Transportation.

ADDITIONAL ELIGIBLE STREET OUTREACH USES VIA ESG-CV

See Appendix 1 for list of ESG-CV of costs.

Street Outreach activities funded with ESG-CV **must** be consistent with CDC guidance related to [street outreach](#) and engaging people at increased risk of severe illness when contracting coronavirus, as well as established best practices. ESG-CV funded outreach programs should encourage (but **may not require**) people experiencing homelessness to get tested if they are experiencing COVID-19 symptoms.

HUD has approved the following as eligible costs under street outreach:

- Engagement: Hand sanitizer, soap, tissue packets, masks, disposable gloves, other PPE.
- Case Management: Coordinating medical care, including accessing the COVID-19 vaccine.
- Transportation: Train or bus tokens, taxi or rideshare for program participants' travel to and from medical care.
- Expanded Staffing: Hiring additional staff to support infectious disease preparedness, providing hazard pay to staff with direct participant contact.
- Provision of handwashing stations and portable bathrooms.
- Maintaining social distancing requirements during engagement.

ESG-CV funding for street outreach to respond to COVID-19 may include providing masks, hand sanitizer, and soap to households experiencing unsheltered homelessness; outfitting staff with personal protective equipment; coordinating medical care and other support services; providing transportation for program participants to travel to and from medical care, and other needed services; hazard pay; and providing reasonable incentives to volunteers (e.g. stipends, gift cards) who are helping to provide necessary services during the coronavirus outbreak.

Handwashing Stations and Portable Bathrooms

ESG-CV funds may be used for costs of providing urgent, non-facility-based care to unsheltered households who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. To this end, funds may be used for portable hygiene services and the staffing, equipment, supplies and services to clean and maintain these facilities to support households experiencing unsheltered homelessness. Examples include handwashing

stations and bathrooms (e.g., porta potties) and shower trucks with soap and shampoo.

Street Outreach Policies

Maintenance of Effort Requirement

If the grantee or subgrantee is a local government, ESG-CV funds **cannot be used to replace** the local government funds for street outreach and emergency shelter services during the immediately preceding 12-month period, unless HUD determines that the unit of general purpose local government is in a severe financial deficit ([24 CFR 576.101his](#)).

B. Emergency Shelter

Emergency shelter means any appropriate facility that has the primary use of providing temporary or transitional shelter for the homeless in general or for specific populations of the homeless and the use of which does not require occupants to sign leases or occupancy agreements*. Emergency Shelter must be provided in compliance with Program Standard #3—*Emergency Shelter Operations* and Program Standard #4—*Assessing, Prioritizing and Reassessing Needs for Essential Services Related to Emergency Shelter*. ESG funds can be used to provide essential services; renovation; and shelter operations.

Emergency shelter types may include:

- **Day Shelters:** temporary daytime accommodations and services for individuals and families who meet the definition of literally homeless as described under Client Eligibility and are sleeping on the streets, lack a fixed, regular and adequate nighttime shelter and/or are living in an emergency shelter.
- **Mass Shelters:** high volume, high turnover, emergency shelters where multiple individuals and/or family households sleep in a large room with multiple beds.
- **Hotel/Motel Vouchers:** used as emergency shelter in those areas and times when no emergency shelter is available. Subrecipient must use the Lack of Shelter Availability form (Attachment K), to document all attempts used verify a lack of shelter availability, prior to the issuance of motel voucher.

1) Essential Services

Emergency shelter essential services are services to homeless families and individuals in emergency shelters. Program applicants meeting the definition of homeless in Categories 1, 2, 3, and 4 are eligible for emergency shelter services.

Eligible uses for funds within the Emergency Shelter Essential Services category include:

Case Management

Case Management activities assess, arrange, coordinate, and monitor individualized services developed for program participants. Eligible costs include:

- Using coordinated entry;
- Conducting initial evaluations 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; **and**
- Developing an individualized housing and service plan, including planning a path to permanent housing stability.

Child Care Costs

The cost of childcare is eligible if the child is under the age of 13, or disabled children under the age of 18. The child-care center must be licensed by the jurisdiction in which it operates. Eligible costs include:

- Childcare costs;
- Providing meals and snacks; **and**
- Comprehensive and coordinated sets of appropriate developmental activities.

Education

Education is instruction or training to enhance participants' ability to obtain and maintain housing, consumer education, health education, substance abuse prevention, literacy, ESL, GED preparation and various life skills. Eligible costs include:

- Screening, assessment, and testing;
- Individual/group instruction;
- Tutoring;
- Books, supplies, and instructional materials;
- Counseling; **and**
- Referral to community resources.

Employment Assistance and Job Training

Job Assistance services help participants to secure employment and placement in job training programs. Eligible costs include:

- Classroom, online, and/or computer instruction;
- On the job instruction;
- Job finding and skill building;
- Reasonable stipends to program participants in employment assistance and job training programs;
- Books and instruction materials;
- Employment screening; assessment or testing;
- Structured job seeking support;
- Special training and tutoring; including literacy training and pre-vocational training;
- Counseling or job coaching; **and**
- Referral to community resources.

Outpatient Health

Outpatient Health Services are eligible activities to the extent that other appropriate services and treatment are unavailable or inaccessible within the community. Eligible costs include:

- Assessing health problems and developing treatment plans;

- Assistance in understanding health needs;
- Providing directly or assisting to obtain appropriate medical treatment, preventive medical care, health maintenance services, including emergency medical services;
- Providing medication and follow-up services; **and**
- Providing preventive and non-cosmetic dental care.

Legal services

Legal advice and representation are eligible activities to the extent that other appropriate services and treatment are unavailable or inaccessible within the community. This would include necessary legal services regarding matters that interfere with the program participant's ability to obtain and retain housing. Legal issues would include child support, guardianship, paternity, emancipation, legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking, appeal of veterans and public benefit claim denials, and resolution of outstanding criminal warrants. Eligible costs include:

- Hourly fees for legal advice and representation by licensed attorneys and certain other fees-for-service;
- Client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling; **and**
- Filing fees and other necessary court costs.

Legal services to address immigration, citizenship, and mortgage issues including retainer fee arrangements, and contingency fee arrangement are **not** eligible costs.

Life Skills Training

Life Skills Training teaches critical life management skills that may never have been learned or have been lost during physical or mental illness, domestic violence, substance use, and homelessness. Allowable services must support the program participant to function independently in the community. They include:

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

Mental Health Services

Mental Health Services are eligible activities to the extent that other appropriate services and treatment are unavailable or inaccessible within the community. Services are direct outpatient treatment of mental health conditions by licensed professionals. Eligible costs include:

- Crisis intervention;
- Individual, household, or group therapy sessions;
- Prescription of psychotropic medications and explanation about the use and

- management of medications; **and**
- Combinations of therapeutic approaches to address multiple problems.

Substance Abuse Treatment

Substance Abuse Treatment is an eligible activity to the extent that other appropriate services and treatment are unavailable or inaccessible within the community. Services must be provided by licensed or certified professionals, and be designed to prevent, reduce, eliminate or deter relapse of substance abuse or addictive behaviors. Inpatient detoxification and other inpatient drug or alcohol treatment are not eligible costs. Eligible costs include:

- Client intake and assessment;
- Outpatient treatment for up to 30 days;
- Group and individual counseling; **and**
- Drug testing

Transportation

Costs of travel by program participants to and from medical care, employment, childcare or other facilities that provide eligible essential services are eligible. Staff travel costs incurred to support provision of essential services are also allowable. Eligible costs include:

- Public transportation for participants;
- Mileage allowance for service workers using their own vehicles to visit program participants; **and**
- Purchasing or leasing a vehicle used for transport of participants and/or staff serving participants, including the cost of gas, insurance, taxes, and maintenance for purchased or leased vehicles.

Services for Special Populations

Services for Special Populations means otherwise eligible essential services that are tailored to address the special needs of homeless youth, victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers, domestic violence shelters and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking. Also eligible are services provided to persons living with HIV/AIDS in emergency shelters. Eligible costs include:

- Case management;
- Childcare;
- Education services;
- Employment assistance and job training;
- Outpatient Health services;
- Legal services;
- Life Skills training;
- Mental health services;
- Substance abuse treatment services; **and**
- Transportation.

All shelters must meet minimum habitability standards. See ***Habitability Standards*** section

of this manual. Shelters renovated with ESG funds are also required to meet state or local government safety and sanitation standards, as applicable, including the use of energy-efficient appliances and materials.

ESG funds may not be used for rehabilitation or renovation of structures that will be used for inherently religious activities. ESG funds may pay for rehabilitation of structures only to the extent that those structures are used for conducting eligible activities under the ESG program. Where a structure is used for both eligible and religious activities, the amount of ESG funds used may not exceed the cost of those portions of the rehabilitation that are attributable to eligible activities in accordance with the cost accounting requirements applicable to ESG funds. Sanctuaries, chapels, or other rooms used as a principal place of worship are ineligible for funded improvements paid by ESG.

For all shelter rehabilitation, conversion, or renovation, Sub-recipient and its contractors must comply with Section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act. The requirements of Section 6002 include procuring only items designated in guidelines of the Environmental Protection Agency (EPA) at 40 CFR part 247 that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the item exceeds \$10,000 or the value of the quantity acquired by the preceding fiscal year exceeded \$10,000; procuring solid waste management services in a manner that maximizes energy and resource recovery; and establishing an affirmative procurement program for procurement of recovered materials identified in the EPA guidelines.

2) Shelter Operations

Shelter operations are costs to operate and maintain emergency shelters and provide other emergency lodging when appropriate. Eligible costs include:

- Minor or routine maintenance;
- Rent;
- Security;
- Fuel;
- Equipment;
- Insurance;
- Utilities;
- Food;
- Furnishings;
- Supplies necessary for the operation of the emergency shelters; **and**
- Hotel/Motel voucher, only for families and individuals where no emergency shelter is available.

3) Assistance Required under “URA”

Subrecipient must ensure they have taken all reasonable steps to minimize the displacement of persons or commercial entities because of a project assisted with ESG funds. No tenant occupant of housing that is converted into an emergency shelter may be required to relocate temporarily for a project assisted with ESG, or be required to move to

another unit in the same building/complex. When a tenant is required to move because of a project assisted with ESG under conditions that trigger the Uniform Relocation Assistance (URA) and Real Property Acquisition Policies Act (42 U.S.C. 4601- 4655), the tenant should be treated as permanently displaced and offered relocation assistance and payments consistent with the Act.

Any person who disagrees with Subrecipient's determination concerning whether the person qualifies as a displaced person or the amount of relocation assistance offered, may file a written appeal of that determination with Sub-recipient under 49 CFR 24.10. A low-income person who disagrees with the determination may submit a written request for review of that determination to the nearest HUD field office.

Subrecipient must keep records documenting compliance with the displacement, relocation, and acquisition requirements of the ESG program. See 24 CFR 576.408.

EXPANDED EMERGENCY SHELTER USES VIA ESG-CV

Emergency shelter operations and services to households residing in emergency shelter are allowable activities. Households are eligible for emergency shelter assistance if they are unsheltered or residing in a temporary housing program.

Emergency shelter activities funded with ESG-CV should be in alignment with recommended guidance to 24 CFR 35.115 (a)(1) through (13), [effectively manage infectious disease within the shelter](#) during coronavirus. ESG- CV funding for emergency shelter to respond to COVID-19 may include providing cleaning supplies; personal protective equipment for staff and program participants; portable hygiene services; volunteer incentives; hazard pay; furnishings such as room dividers and cots; and costs associated with providing transportation for program participants to travel to and from medical care, and other needed services. Shelters are encouraged to use funds provided through ESG-CV to purchase technology to access telehealth services provided through Federally Qualified Health Centers (FQHC) or other medical options within the community.

Emergency shelter renovation, rehabilitation, or conversion are eligible expenses. Grantees should work closely with COUNTY to ensure adherence to HUD requirements.

If no appropriate emergency shelter is available, grantees may use ESG or ESG-CV funds to provide unsheltered homeless individuals with hotel/motel vouchers. Hotel/motel vouchers may be provided if shelter beds are available, but it is not safe for them to use because of the need for social distancing.

Eligible costs include:

- A hotel or motel room directly or through a hotel or motel voucher
- Cleaning of hotel or motel rooms used by program participants
- Repairs for damage caused by program participants above normal wear and tear of the room.

No household shall be denied access to safe housing, which may include alternative housing or a hotel room, even if they have been exposed or are symptomatic with coronavirus. Health related questions **should not** determine admission, access to programs and **should not be**

asked to screen people out of shelter. If shelters utilize symptom screening as a part of intake procedures, it **must** be reviewed and approved by the local public health department. ESG-CV funded shelter programs should encourage (but **may not require**) people experiencing homelessness to get tested if they are experiencing COVID-19 symptoms. Someone who presents at an ESG or ESG-CV-funded shelter with respiratory symptoms (e.g., cough) **should not** be turned away solely because of their health symptoms. Additionally, shelters **cannot** require participants to receive the COVID-19 vaccination to receive services.

The purpose of ESG-CV funds is to prevent, prepare for, and respond to COVID-19 to prevent and mitigate the spread of COVID-19 among people experiencing homelessness and the staff that provide services to these individuals. This requires that existing shelters implement public health protocols such as enforcing social distancing, establishing an isolation space (especially for residents suspected of having COVID-19, those with confirmed cases, and high-risk residents such as elderly people and people with pre-existing health conditions), using personal protective equipment (PPE), and cleaning/disinfecting shared and living spaces. If existing shelters are not available or where current shelters are not able to implement these safety protocols, additional space may need to be identified to allow people to have shelter while staying as healthy as possible. This may be space within an existing shelter (e.g., an office not being used) that could be temporarily converted into a quarantine space for someone who has tested positive or is awaiting test results, or it could be an entirely separate building. Eligible shelter spaces may include public spaces, pop up or modular structures in compliance with [HUD Guidance](#).

Shelters funded by ESG-CV **may not** turn away eligible program participants and **must** establish referral pathways to other shelters or housing if the shelter is at maximum capacity. Shelters **must** establish referral pathways to isolation and quarantine if a client needs such services. Shelters funded by ESG-CV are **strongly discouraged** from implementing a maximum length of stay when a discharge will result in program participants returning to unsheltered settings or situations putting them at a higher risk of COVID-19 infection.

Any ESG-CV funded shelter that is considering closing or not accepting new residents **must** immediately notify COUNTY, the local Continuum of Care, the local department of public health, and emergency management officials.

Temporary Emergency Shelter

ESG-CV funds may be used to pay for temporary emergency shelter costs to prevent, prepare for, and respond to coronavirus to assist individuals and families experiencing homelessness. Eligible costs include leasing, operations, services, property acquisition and renovation. Property acquisitions must not exceed \$2.5M per property and will be made subject to disposition regulations as governed by Part 200. Additionally, ESG CV funding used for renovation may trigger the minimum use regulation, depending on the value of the renovation.

Temporary Emergency Shelter is defined as a structure or any portion of a structure, which is used during a Federal, state, or local emergency declaration, such as for a natural disaster or public health emergency, and for up to 12 months after that declaration expires, to provide

shelter for individuals and families displaced from their normal place of residence or sheltered or unsheltered locations.

Temporary Emergency Shelters are exempt from 24 CFR 35.115(a)(1) through (13).:

- Minimum standards for emergency shelters at [24 CFR 403\(b\)](#);
- Other requirements as defined by 27 CFR 576, such as lead-based paint may still apply
- Environmental Review
- Minimum period of use requirement (24 CFR 576.102(a)(xi)(4)(c))

Grantees **must** retain documentation that the shelter met the definition of temporary emergency shelter. Acquisition and renovation costs are subject to Disposition requirements outlined in [2 CFR 200.311 – Real Property](#) which requires repayment to HUD. Grantees who are considering acquisition and renovation costs should work closely with COUNTY staff to ensure adherence to requirements.

Emergency Shelter Activity	Temporary Emergency Shelter	Permanent Emergency Shelter
Renovations	Allowable, repayment required	Allowable, minimum period of use required
Acquisition	Allowable, repayment required	Not allowable

Program participants residing in emergency shelter **cannot** be required to sign leases or occupancy agreements, receive treatment, or perform any other prerequisite activities as a condition for staying in any shelter or receiving services.

HUD has approved the following as eligible costs under Emergency Shelter and Temporary Emergency Shelter:

SHELTER OPERATIONS	
Supplies	<ul style="list-style-type: none"> ● Cleaning supplies such as bleach, disinfectant wipes, scrubbers, and mops. ● Protective equipment such as face masks and shields, disposable gloves, and sneeze guards for staff and program participants. ● Bed linens, towels, hand sanitizer, soap, and tissue packets. ● Individually boxed meals and bottled water.
Furnishings	<ul style="list-style-type: none"> ● Cots and room dividers.

Equipment	<ul style="list-style-type: none"> Washers, dryers, portable hand washing stations, portable showers, car or van purchase for transporting participants, and ventilation systems (e.g., high-efficiency particulate air [HEPA] filters and air purifiers).
Outpatient Health services*	<ul style="list-style-type: none"> Medication, emergency medical services, medication and follow-up services, and coordinating or providing medical treatment that are otherwise inaccessible or otherwise unavailable within the community. <p>*Services must be provided by licensed medical professionals and otherwise</p>
Transportation	<ul style="list-style-type: none"> Train or bus tokens, taxi or rideshare for program participants travel to and from medical care, and car or van purchase for transporting participants or staff serving program participants.

B. Emergency Shelter Policies

Prohibition against involuntary family separation.

The age of a child under age 18 **must not** be used as a basis for denying any family’s admission to an emergency shelter that uses ESG-CV funding or services and provide shelter to families with children under age 18.

Maintenance of Effort Requirement

If the grantee or subgrantee is a unit of general-purpose local government, ESG-CV funds **cannot** be used to replace funds the local government provided for street outreach and emergency shelter essential services during the immediately preceding 12-month period, unless HUD determines that the unit of general-purpose local government is in a severe financial deficit. The maintenance of effort requirements does not apply to shelter operation costs.

C. Rapid Re-Housing and Homelessness Prevention Assistance

Rapid Re-Housing and Homelessness Prevention Assistance include rent assistance and housing relocation and stabilization services for households experiencing homelessness and households at-risk of homelessness based on the household’s housing status at the time of program entry.

Rapid Re-Housing assistance is available for persons who meet the criteria under paragraph (1) or paragraph (4) according to HUD’s definition in [Household Eligibility](#). Homelessness Prevention assistance is available for persons who are at imminent risk of homelessness or at- risk of homelessness according to HUD’s definition in [Household Eligibility](#).

The CARES Act provide that ESG-CV funds may be used to mitigate the economic impact of COVID-19. Programs are encouraged to consider the maximum number of rental assistance months to be extended/adjusted to address unemployment, loss of income, or benefits due to COVID-19. Additionally, CARES Act ESG-CV funding does not require a rental payment for households receiving financial assistance and projects are expected to serve people with zero income.

Please Note: Subrecipients and providers **cannot** require participants to receive the COVID-19 testing or vaccination to receive rapid re-housing or homelessness prevention services, including

prioritizing assistance.

ESG-CV funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the “homeless” definition in [24 CFR 576.2](#). ESG-CV rent assistance and housing relocation, and stabilization services **should** be prioritized for households with the longest history of homelessness and for households with the most severe service needs including COVID-19 related needs.

Prioritization for homelessness prevention are households earning less than 50 percent of Area Median Income (AMI) who are determined to have no alternative resources and no other place to go. The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant’s current permanent housing or move into other permanent housing and achieve stability in that housing. Homelessness prevention **must** be provided in accordance with the housing relocation and stabilization services requirements in [24 CFR 576.105](#), the short-term and medium-term rental assistance requirements in [24 CFR 576.106](#), and the written standards and procedures established under [24 CFR 576.400](#).

Landlord Incentives

ESG-CV may be used to pay for landlord incentives that are reasonable and necessary to assist households in obtaining housing. Grantees **may not** use ESG-CV funds to pay the **landlord incentives an amount that exceeds three times the rent charged for the unit**. Landlord incentives can include signing bonuses, security deposits, costs to repair damages, and extra cleaning fees, or any combination thereof as defined below, subject to the incentive limit noted above:

- Signing bonuses up to 2 months’ rent;
- Security deposits equal to up to three months of rent, (separate from the costs of security deposits under 24 CFR 576.105(a) and therefore, does not factor into the cap established in this section);
- Costs to repair 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.
- Paying the cost of extra cleaning or maintenance of a program participant’s unit or appliance.

Landlord incentives may be charged under Rapid Re-Housing and Homelessness Prevention budget categories.

Program records that document that program costs are reasonable **MUST** be maintained in accordance with COUNTY’S record retention policy.

D. Additional Eligible Uses

Training

ESG-CV funds may be used to train staff on infectious disease prevention and mitigation for staff working directly to prevent, prepare for, and respond to coronavirus among households who are homeless or at-risk of homelessness. The costs are eligible as a standalone activity, not as an administrative cost, and do not need to be tied to a specific intervention.

Training costs are allowable under all ESG-CV components and can be provided to both homelessness assistance providers and to those who do not receive funding through the CARES

Act.

Grantees **must** maintain meeting agendas and notes to support eligibility of this expense.

Hazard Pay

ESG-CV funds may be used to pay hazard pay for COUNTY and Subrecipient staff who work directly to prevent, prepare for, and respond to coronavirus among households who are homeless or at-risk of homelessness.

- Examples of staff working directly in support of coronavirus response include:
 - Street outreach teams
 - Emergency Shelter staff
 - Staff providing essential services (e.g., outpatient health or mental health, housing navigators)
 - Staff in proximity to persons with coronavirus or working in locations with a high likelihood of contracting coronavirus

Hazard pay may be billed under Homelessness Prevention, Rapid Re-Housing, Emergency Shelter, and Street Outreach program components. While COUNTY has the authority to establish its own hazard pay amounts and caps, Subrecipients are subject to, COUNTY should ensure the following criterion is met:

- The costs are equity allocated to all related activities including Federal awards; and COUNTY and Subrecipients **must** maintain records that include job descriptions, policies and procedures or other program records that detail positions receiving hazard pay.

Volunteer Incentives

ESG-CV may be used to provide reasonable incentives (e.g., food, stipend or gift cards) to volunteers who help to provide necessary street outreach, emergency shelter, essential services, and housing relocation and stabilization services during the coronavirus outbreak. Volunteer incentives may be billed under Homelessness Prevention, Rapid Re-Housing, Emergency Shelter, or Street Outreach. Program records should document that costs are reasonable.

E. Essential Services Comparison between Outreach and Shelter

Services through the street outreach component are not the same as services provided through emergency shelter systems. The chart below compares appropriate services for each component.

Comparison of Essential Services	
Street Outreach (Unsheltered Homeless persons)	Emergency Shelter Services (Sheltered Homeless persons)
Engagement	----
Case Management	Case Management
----	Childcare
----	Education Services
----	Employment Assistance/Training
Emergency Health Care	Outpatient Health Services
----	Legal Services
----	Life Skills Training
Emergency Mental Health Care	Mental Health Services
Services for Special Populations	Services for Special Populations
----	Substance Abuse Treatment
Transportation	Transportation

F. Homelessness Prevention and Rapid Re-housing

Homelessness Prevention Services are intended to prevent persons who are housed from becoming homeless by helping them regain stability in their current housing or other permanent housing. Eligible participants must be at imminent risk of homelessness, homeless under other federal statutes, fleeing/attempting to flee domestic violence or meet the criteria for being at-risk of homelessness and have annual incomes below 30% of area median income. Rapid re-housing services are intended to help eligible participants who are literally homeless, including fleeing/attempting to flee domestic violence, to transition from the streets or shelter as quickly as possible into permanent housing and achieve housing stability. Eligible participants for either service component must lack the resources or support networks to help them retain or obtain other appropriate, stable housing. Eligibility determination and prioritization must comply with Program Standard #6—*Determining and Prioritizing Eligibility for Homelessness Prevention and Rapid Re-housing Assistance*.

Eligible activities for both service components include housing relocation and stabilization services and short- and medium-term rental assistance. These activities must comply with Program Standard #8—*Determining Duration and Amount of Rental Assistance Provided to Client*.

If a client was first assisted under homelessness prevention and then became homeless, Sub-recipient must exit the client from the homelessness prevention component and enter the individual or household into the rapid re-Housing component.

1) Homelessness Prevention and Rapid Re-housing Comparison

The chart below shows the differences between Homelessness Prevention and Rapid Re-Housing service components.

	Homelessness Prevention	Rapid Re-Housing
Eligible Participants	Category 2 – Imminent Risk Category 3 – Other Federal Statutes Category 4 – Fleeing/Attempting to Flee Domestic Violence and has no other residence OR At-Risk of Homelessness	Category 1 – Literally Homeless OR Category 4 – Fleeing/Attempting to Flee Domestic Violence and has no other residence.
Purpose	<ul style="list-style-type: none"> To <u>prevent</u> persons who are housed from becoming homeless To help such persons <u>regain stability</u> in their current housing or other permanent housing 	<ul style="list-style-type: none"> To help homeless persons living on the streets or in an emergency shelter <u>transition</u> as quickly as possible into permanent housing, and then To help such persons <u>achieve stability</u> in that housing
Reassessment	<ul style="list-style-type: none"> Every 3 months (Every 6 months for ESG-CV) Must have income below 30% AMI AND (must be below 50% AMI for ESG CV) 	<ul style="list-style-type: none"> Every 12 months Must have income <u>below 30% AMI</u> (50% AMI for ESG-CV) (at reassessment), AND Lack resources and support network
Eligible Activities	Housing Relocation and Stabilization Services and Financial Assistance Short – and Medium-Term Rental Assistance	Housing Relocation and Stabilization Services and Financial Assistance Short – and Medium-Term Rental Assistance

2) Housing Relocation and Stabilization Financial Assistance

ESG funds may be used to pay landlords, utility companies and other third parties for the following housing related costs:

- **Rental application fee** charged by the landlord to all applicants;
- **Security deposit**, equal to or not more than 2 month’s rent;
- **Last month’s rent**, paid to landlord at the time security deposit and first month’s rent are paid. The amount must not exceed one month’s rent and is included in participant’s total rental assistance amount;
- **Moving costs**, including truck rental, hiring a moving company, and temporary storage fees. Storage fees may be up to 3 month’s rent, providing costs are not incurred until after program participation begins and before move-in. Moving costs may not include arrearage temporary storage fees;
- **Standard utility deposit** (gas, electric, water, sewer) required by the utility company for all customers;
- **Standard utility payments** (gas, electric, water, sewer) up to 24 months during any 3-year period, including up to 6 months of arrearages per service. Utility account must be in the name of a member of the client household or there is other verification of the household’s responsibility for the utilities.

Subrecipient may develop a written policy regarding to whom the landlord and utility

companies will refund security and utility deposit payments. Any policy must be applied consistently for all program participants. Any deposit funds returned to Subrecipient is program income and must be documented as match.

Financial assistance cannot be provided to a program participant who is receiving the same type of assistance through other public sources or to a program participant who has been provided with replacement housing payments under the URA, during the period covered by the URA payments. Financial assistance refers to: rental application fees, security deposits, last month's rent, utility deposits, utility payments and moving costs.

3) Housing Relocation and Stabilization Services

ESG funds may be used to provide the following services:

- **Housing search and placement** including assessment of client housing barriers, needs, and preferences; housing search and landlord recruitment, assistance with rental applications and agreements, ensuring housing compliance with habitability and other housing related requirements;
- **Housing Stability Case Management** including client eligibility and service needs assessment, development of individualized housing and service plans, conducting required re-evaluations and follow-up, and coordinating access to other federal, state and local benefits;
- **Mediation** services to prevent the tenant from losing their housing including mediation between tenant and landlord, household members, neighbors or others impacting the tenant's housing stability;
- **Legal Services** pertaining to certain legal matters as identified in 24 CFR 576.102(a)(1)(vi) that are necessary to resolve for program participant to obtain or maintain stable housing; **and**
- **Credit Repair** including credit counseling, household budgeting, money management, obtaining credit reports and resolving credit related barriers to housing stability.

4) Short- and Medium-Term Rental Assistance

A participant can be provided up to 24 months of rental assistance during any 3-year period. Rental assistance may include payment of rent arrearages for tenant or project-based housing. Duration of rental assistance must minimally comply with program standards including:

- **Short-Term Assistance** is for up to 3 months' rent;
- **Medium-Term Assistance** is more than 3 months, no more than 24 months; **and Payment of Arrearages** must be a one-time payment of up to 6 months' rent, including

late fees, Per 24 CFR 576.106(a). If arrears are owed to a previous landlord, these arrears may be paid, but only when there is documented evidence that payment of those arrears is necessary for the participant to obtain permanent housing and maintain stability in that housing.

Subrecipient must comply with department minimum standards and COC standards regarding rental assistance. Subrecipient may establish their own written requirements beyond these standards upon review and approval by (OHS). Any Subrecipient determined requirements must be applied consistently for all program participants within each ESG-funded program and be available to the public as a written policy.

Rental Assistance can be either tenant-based or project-based. Tenant-based rental assistance allows program participants to select a housing unit. If the participant chooses to move to another location within the service area, the rental assistance can go with them to the new unit. Project-based rental assistance requires the Subrecipient or a contracted agency to identify permanent housing units that meet ESG requirements. Subrecipient enters into a rental assistance agreement with the owner to reserve the unit and provides the unit at a subsidized rent to eligible program participants.

Under rapid re-housing a Subrecipient may provide tenant-based rental assistance to a program participant that chooses a unit in which the Subrecipient has an ownership interest. However, the Subrecipient cannot exclusively direct a program participant to a unit it owns, nor can it carry out the initial evaluation to determine eligibility for the assistance. The Subrecipient would need to provide documentation that the program participant had a choice of other units. A Subrecipient must receive a HUD approved waiver to provide project-based assistance for a unit where the Subrecipient has ownership interest (refer to Section VI, Part C for more detail). A waiver is also required to provide homelessness prevention rent assistance to a participant residing in a unit owned by the Subrecipient. Waiver requests must be submitted to OHS for review and submission to HUD.

Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, 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 assistance may not be provided to a program participant who has been provided with replacement housing payments under the URA during the period covered by the URA payments.

5) Rental Agreement and Lease

Short- and medium-term rental assistance requires a lease between the program participant and landlord.

Each program participant receiving rental assistance must have a legally binding, written lease for the rental unit.

6) Rent Reasonableness Determination

Subrecipient must whether the gross rent of a particular unit is a reasonable rent in

comparison to rent for other comparable unassisted units. To make this determination, Subrecipient must consider 1) the location, quality, size, unit type, and age of the contract unit; and 2) any amenities, housing services, maintenance and utilities to be provided by the owner in accordance with the lease. The unit's gross rent must be comparable to the rent reasonableness rent for the unit to be considered for rental assistance.

Per 24 CFR 574.320(a)(3) Rent Reasonableness, Subrecipient must determine the review method(s) they will use to establish the rent reasonableness standards for their area.

Comparable rents vary over time with market modifications. Rent Reasonableness standards must be reviewed periodically and adjusted to align with these rent market changes. The Rent Reasonableness review completed for each unit must be documented in the client case file.

PLEASE NOTE: RENTAL ASSISTANCE CANNOT EXCEED THE ACTUAL RENTAL COST, WHICH MUST BE IN COMPLIANCE WITH HUD'S STANDARD OF RENT REASONABLENESS. The rent reasonableness requirement is not applicable in instances where no rental assistance is being provided.

Fair Market Rent (FMR) Requirement HUD establishes FMRs to determine rent ceilings for HUD-funded rental assistance programs. HUD publishes the FMR schedule annually for 530 metropolitan areas and 2,045 non-metropolitan county areas.

Gross rent for units in which ESG provides rental assistance must be the same or less than the FMR for that location. The applicable FMR data should be copied and placed in the client file to document the FMR for that participant's unit size and geographic area.

PLEASE NOTE: The FMR requirement is not applicable in instances where no rental assistance is being provided. THE FAIR MARKET RENT REQUIREMENT IS WAIVED FOR ESG-CV, PROVIDING THE RENT COMPLIES WITH HUD STANDARDS OF RENT REASONABLENESS.

The Subrecipient must determine the eligibility of ESG assistance for a unit when providing rental assistance to a client. To be eligible, the permanent housing unit must meet: Rent Reasonableness, FMR and Habitability Standards (waived for ESG-CV), which will be discussed in a later section. Subrecipient must use the FMR and Rent Reasonableness Certification form (Attachment L) to make the determination.

7) Calculating Gross Rent

Whether a household is seeking to maintain its current housing or relocate to another unit to avoid homelessness, or exiting homelessness into new permanent housing, the process for determining acceptable rent amounts is the same: the gross rent (rent plus appropriate utility allowance) must 1) be no greater than the FMR set by HUD and 2) fit within the limitations resulting from a rent reasonableness analysis. The rent for the unit being assisted with program funds cannot exceed the lesser of the FMR or the rent reasonableness standard. If the gross rent for the unit exceeds either the rent reasonableness standard or FMR, the Subrecipient is prohibited from using ESG funds for

any portion of the rent, even if the household is willing and/or able to pay the difference.

Fair Market Rent and rent reasonableness requirements do not apply when a program participant receives only financial assistance or services. This includes rental application fees, security deposits, utility payments/deposits, moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, legal services, and credit repair.

A utility allowance is a projection of the cost of utilities the client will pay monthly while renting their unit. Subrecipient must determine the amount of utility allowance to be used in the calculation of gross rent. The local public housing authority maintains a utility allowance chart which considers the number of bedrooms and types of utilities in a unit (e.g.; gas and/or electric, water, sewer, and trash). Any utilities included in the rent payment must not also be included in the utility allowance calculation. Telephone, cable or satellite television service, and internet service are not counted as utility costs.

To calculate the gross rent of a unit:

total contract rent amount of the unit

±

allowable* fees required for occupancy under the lease

±

, monthly utility allowance established by local public housing authority

≡

Gross Rent Amount

*excludes late fees and pet fees

Example:

A case manager wants to rapidly re-house a mother and son and has identified a 2-bedroom unit at a rent of \$1,200 per month, not including utilities. The utility allowance for that size and type of unit is \$150. Therefore, the gross rent is \$1,350. A check of three similar units in the neighborhood reveals that the reasonable rent is \$1,400 for that area of the city. However, the FMR for the jurisdiction is \$1,300. This means the household cannot be assisted with ESG rental assistance in this unit because the gross rent exceeds the FMR.

Once a housing unit is determined to meet the FMR and rent reasonableness requirements, program funds may be used to pay for the actual utility costs. The utility allowance calculation is only used to determine whether the unit meets the FMR standard.

8) Eligibility Re-certification

Reassessments are required for homelessness prevention and rapid re-housing participants. Homelessness prevention reassessments are required every three months and must verify that a household continues to have an annual income below 30% (below 50% for ESG-CV) of area median income and lacks the resources or support to retain or obtain appropriate permanent housing. Rapid re-housing assessments are required at least once per year to verify that a household's income is below 30% area median income (below 50% for ESG-CV), and they lack the resources and support networks to retain or

obtain appropriate permanent housing. If a client informs but is not required by the Subrecipient to notify staff of a change in income or other circumstances that may affect eligibility, there is no immediate effect on the client's eligibility and assistance can continue until the next required re-evaluation.

9) Housing Stability Case Management

ESG funds may be used to pay the cost of assessing, arranging, coordinating and monitoring the delivery of individualized housing stabilization services to a program participant already in permanent housing (not to exceed 24 months) or to assist a program participant to overcome immediate barriers to obtaining housing (not to exceed 30 days). Subrecipients are required to provide case management to all clients receiving homelessness prevention and rapid re-housing services. Clients receiving short and medium-term rental assistance are required to be case-managed

and have a housing stability service plan. Case management includes the following services:

- Using a coordinated entry process (upon the CoC's development or approval of this system);
- Conducting initial evaluation, including verification and documentation of eligibility, in accordance with the CoC's coordinated assessment system requirements (24 CFR 576.401(a));
- Developing, securing and coordinating services;
- Obtaining federal, state, and local benefits;
- Monitoring and evaluating participant's progress in the program;
- Developing an individualized housing stability service plan; **and**
- Conducting re-evaluations of participant's eligibility and types and amounts of assistance needed.

NOTE: Program participants receiving homelessness prevention or rapid re-rehousing assistance should be provided housing stability case management as is safe and feasible. Housing case management is waived and **cannot** be a requirement for assistance, but grantees should make housing stability and other appropriate services available and accessible.

G. SUMMARY OF ELIGIBILITY BY COMPONENT

- a. The following summarizes the component of services for the category of eligible household (see Attachment I for more details):
 - i. Street Outreach: Individuals defined as homeless under the following categories are eligible for assistance in Street Outreach:
 1. Category 1 = Literally Homeless
 2. Category 4 = Fleeing/ Attempting to Flee DV (where the individual or family also meets the criteria for Category 1)
 - ii. Additional limitation on eligibility: Individuals and families must be living on the streets (or other places not meant for human habitation) and be unwilling or unable to access services in emergency shelter. Emergency Shelter: Individuals and families defined as Homeless under the following categories are eligible for assistance in

Emergency Shelter projects:

1. Category 1 = Literally Homeless
2. Category 2 = Imminent Risk of Homeless
3. Category 3 = Homeless Under Other Federal Statutes
4. Category 4 = Fleeing/ Attempting to Flee DV

iii. Rapid Re-housing: Individuals defined as Homeless under the following categories are eligible for assistance in Rapid Re-Housing projects:

1. Category 1 = Literally Homeless
2. Category 4 = Fleeing/ Attempting to Flee DV

iv. Homelessness Prevention: The following are eligible for assistance in Homeless Prevention projects:

1. People who have an annual income below 30% AMI AND (below 50% for ESG-CV) meet the “homeless” definition under the following categories:
 - a. Category 2 = Imminent Risk of Homeless
 - b. Category 3 = Homeless Under Other Federal Statutes
 - c. Category 4 = Fleeing Abuse and Domestic Violence
2. People who have an annual income below 30% AMI AND (below 50% for ESG-CV) meet the “at risk of homeless” definition under the following categories:
 - a. Category 1 = Individuals and Families
 - b. Category 2 = Unaccompanied Children and Youth
 - c. Category 3 = Families with Children and Youth

H. Homeless Management Information System (HMIS)

a. Reporting Requirements

ESG funded client and activity data must be entered into the COC approved HMIS or alternative database for clients who are victims of violence. Data entry and reporting expectations include:

- i. Timely and accurate data entry into the HMIS (within two working days);
- ii. Acquiring and documenting informed written consent from program participants;
- iii. Protecting program participants’ confidentiality;
- iv. Using the HMIS as a tool to analyze data to inform and improve the delivery of services.

Subrecipients are required to submit reports to OHS with each Request for Reimbursement claim submitted.

ESG funds can be used for the following the HMIS costs:

- v. The costs of using the coordinated entry process, but not the costs of developing or operating the system;
- vi. Staff costs related to the operation and usage of the HMIS;
- vii. Purchase of HMIS software licenses;
- viii. Space and equipment costs related to the HMIS; **and**
- ix. Costs related to monitoring and reviewing data quality, data analysis and reporting.

The Subrecipient must ensure all required data elements, as listed below, are entered into

the HMIS system for ESG participants, in a timely manner, and is inputted no later than three (3) working days after program entry. Services rendered to clients must be entered into HMIS no later than three (3) working days hours from date of service(s). All clients who exit the program must have an updated status in HMIS within three (3) working days from actual exit date.

In addition to the timely entry of HMIS data, Subrecipient is required to enter accurate and complete data. The County will ensure the Subrecipient adheres to Data Quality Standards, as established by HUD, and data entry requirements, as set forth in the HMIS Memorandum of Understanding (MOU) and the OHS Policy Handbook. The Data Quality Standards assess the data quality and completeness of the following Data Elements entered:

- 1) Client Demographic Data
 - a) Name
 - b) Social Security Number
 - c) Date of Birth
 - d) Race
 - e) Ethnicity
 - f) Gender
 - g) Veteran Status
- 2) Universal Data
 - a) Disabling Condition
 - b) Project Start Date
 - c) Project Exit Date
 - d) Destination
 - e) Relationship to Head of Household
 - f) Client Location
 - g) Housing Move-in Date
 - h) Living Situation
- 3) Common Program Specific Data Elements
 - a) Income and Sources
 - b) Non-Cash Benefits
 - c) Health Insurance
 - d) Disability Elements
 - e) Physical Disability
 - f) Developmental Disability
 - g) Chronic Health Condition
 - h) HIV/AIDS
 - i) Mental Health Problem
 - j) Substance Abuse
 - k) Domestic Violence
 - l) Contact
 - m) Date of Engagement
 - n) Bed-Night Date
 - o) Housing Assessment Disposition
- 4) Data Timeliness
 - a) Entry Timeliness

b) Exit Timeliness

The Data Quality Standards require a program to have a five percent (5%) or less error rate to ensure data accuracy and less than a five-day lapse in timeliness for entry of data at time of client entry, services are rendered, and client exit. Any performance benchmarks not meeting these standards will be flagged and captured on a Subrecipient's HMIS Data Quality Report Card (Attachment M) generated by the Office of Homeless Services.

The Report Card will be generated by the County and reviewed on a quarterly basis. The Report Card will be provided to Subrecipient when available, and data deficiencies, if any, will be identified and discussed with Subrecipient to determine methods to remediate and/or improve data quality scores.

If Subrecipient continues to not meet data entry and data quality benchmarks, as established by HUD and set forth in the HMIS MOU and the OHS Policy Handbook, the County may terminate contract for non-compliance.

b. Victim Services Data Collection

Victim Subrecipients are prohibited from entering data in HMIS; however, they are required to maintain comparable databases of their own design which provide aggregate information and data consistent with HMIS data collection requirements. Projects serving survivors of domestic violence where the recipient is not a victim services provider are required to enter data in their HMIS.

c. Performance Measures and Follow-Up Contact

In alignment with the federal and state strategic plans to end homelessness, OHS has established performance measures that require the collection of housing status data at the time of program entry, program exit and six months after program exit. While performance measures are in the process of being further identified and defined, Subrecipients are currently required to report on two specific measures:

- i. Increased housing stability as measured by the percentage of total program participants served who reside in permanent housing at time of exit from program;
and
- ii. Increased housing stability as measured by the percentage of program participants who at program exit reside in permanent housing and maintain permanent housing for six months from time of exit.

Both measurements should be entered into the HMIS. Preliminary performance benchmarks have been set at 30% for all program participants who exit to permanent housing and 80% for those exiting to permanent housing that remain in permanent housing at six-month follow-up. These outcome measurements will be in addition to reporting of required universal data elements that track client characteristic and service data.

Locating and following up with clients can be challenging. Strategies that have shown the best results include the following:

- Follow-up is provided by the case manager or staff with whom the client knows and

- has worked with;
- Informing the client at time of intake/assessment of the need and value of follow-up and requesting their permission to contact them and/or other identified contacts after they exit the program;
- Securing multiple points of contact for the client prior to their exit such as a friend, family member, employer, landlord or someone who the client is likely to stay in touch with during the six-month period;
- Utilizing HMIS clients to verify permanent housing status; and
- Development of MOUs with other agencies such as DHS, Housing Authorities, etc. to determine the housing status of clients.

Regardless of the method of follow-up utilized, Subrecipients must obtain client permission to contact others through a signed release of information.

In addition to reviewing subrecipient adherence to performance measures relating to outcomes, the County will also be tracking subrecipient performance relating the number assisted based upon projections to determine if subrecipients are able to meet overall stated goals for the performance. The County will review performance on a quarterly basis using the Performance Tracking Tool (Attachment N).

I. Duplication of Benefits

“Duplication of benefits” occurs when an individual or household receives financial assistance for the same service from multiple funding sources. Grantees **must** determine and document if the household is receiving assistance from other sources (e.g. philanthropy, faith-based, CDBG CV, CHG, etc.) to avoid duplication of benefits as well as verify that the other form of assistance does not disqualify the eligibility of the individual or household. ([Section 312 \(42 U.S.C. 5155\)](#)).

To assist with minimizing exposure to the risk of Duplication of Benefits, the use of CES and the timely and accurate entry in HMIS is mandatory.

J. Ineligible Activities and Assistance

Ineligible activities that cannot be funded with ESG include, but are not exclusive to:

- a. replacement of existing mainstream resources;
 - b. payments made directly to program participants;
- c. payments on a mortgage or land contract;
- d. payment of rent for eligible individuals or families for the same period and for the same cost types being assisted through any other federal, state, or local housing subsidy program;
- e. payments on credit card bills or other consumer debt, including child support or garnishments;
- f. provision of cash assistance;
- g. payment of costs of discharge planning programs in mainstream institutions such as hospitals, nursing homes, jails, or prisons; **and**
- h. payment for religious activities (**Note:** While organizations that are religious or faith-based are eligible to receive ESG funds, religious activities must be conducted separately, in time and location, from ESG-funded activities and participation must be voluntary for program participants).

IV. Housing and Facility Standards

A. Occupancy Standards

Occupancy standards provide consistent criteria for determining the size of the permanent housing unit for which the household is eligible and thus, the amount of assistance to be provided.

Subrecipient may choose to use the occupancy guidelines set by the Housing Choice Voucher Program, 24 CFR 982 Subpart I: 982.401(d), or develop their own standards. Subrecipient must develop a written policy outlining their occupancy standards requirements and use those standards consistently.

There may be circumstances where it is not appropriate for two persons to share a bedroom. As examples, these occur when the household includes:

- Persons of different generations, persons of the opposite sex, and unrelated adults;
- A live-in care attendant who is not a member of the household; or
- Members with medical problems who need privacy or space for medical equipment.

B. Habitability Standards

All housing units supported with program funds must meet HUD Habitability Standards. The habitability standards apply where the housing is emergency shelter or permanent housing, a new move-in as in such cases of Rapid Re-housing or remaining in place, as in such cases as homelessness prevention. Before any ESG funds can be expended on the unit, the habitability standards evaluation (Attachment Z) must be conducted by a subrecipient staff or representative; the evaluation **must** not be conducted by the ESG-client or affiliate, or the property owner or affiliate. A copy of the habitability standards evaluation is to be maintained in the applicant's client file, along with any photo documentation of the physical conditions of the property. A copy of the report is to be provided with the claim submission, until the Staff Analyst assigned to the Provider's portfolio has been able to confirm that the provider is correctly completing inspections and only funding eligible properties.

The minimum standards required for all emergency shelters funded by ESG (any form of emergency shelter assistance including shelter operations, conversion, major rehabilitation, and other renovation) are described at 576.403(b)(1) through (11). For conversion, major rehabilitation, and other renovation, grantees must also meet state or local government safety and sanitation standards, as applicable. This includes, but is not limited to the California Building, Electrical, Plumbing, Mechanical, and Energy Codes, as well as Disabled Access Regulations contained in Title 24 of the California Code of Regulations. Furthermore, the program must comply with the more stringent of the two.

All other housing funded by ESG (permanent housing), must meet the standards described at 576.403(c)(1) through (10).

1) Permanent Housing

Minimum habitability standards for permanent housing include requirements for:

- structure and materials;

- personal space and security;
- interior air quality;
- water supply;
- sanitary facilities;
- heating and cooling operating equipment;
- natural and electrically produced light;
- area for food preparation;
- safe and sanitary project maintenance;
- fire safety; **and**
- meets additional recipient/subrecipient standards (if any).

For households moving into a new unit, the unit must meet habitability standards before the lease is signed and the household moves in. For households already residing in a unit, the unit must meet habitability standards before financial or rental assistance can be provided.

Pursuant to ESG-CV regulations, minimum inspection standards for permanent housing are required:

Minimum Inspection Standards for Permanent Housing (Habitability Standards) for ESG-CV

The requirements at 24 CFR 576.403(c) are waived and the ESG subrecipient can provide rental assistance and housing relocation and stabilization services without first inspecting the unit so long as:

- a. The recipient or subrecipient maintains documentation showing the prior rental assistance provider determined that the housing meets the habitability standards established at 24 CFR 576.403(c);
- b. The recipient or subrecipient provide no more than 90 days of RRH assistance to the program participant; or
The recipient or subrecipient conducts an inspection within the first 90 days and determines the housing meets the habitability standards established at 24 CFR 576.403(c).

2) Shelters

In addition to established housing codes, habitability standards for shelters in which ESG funds are used for conversion, major rehabilitation or renovation include requirements for the following:

- structure and materials;
- access to and within the shelter;
- personal space and security;
- interior air quality;
- water supply;
- sanitary facilities;
- heating and cooling operating equipment;

- natural and electrically produced light;
- area for food preparation;
- safe and sanitary facility maintenance;
- If ESG funds were used for renovation or conversion, the shelter meets state or local government safety and sanitation standards, as applicable;
- fire safety/smoke detectors; **and,**
- meets additional recipient/subrecipient standards (if any).
- **Habitability and environmental reviews are not required for temporary emergency shelters.**

All buildings renovated with ESG/ESG-CV funds being maintained as a shelter for homeless individuals and families for a period, starting from the date they were first occupied by a homeless individual or family after the completed renovation, of not less than:

- a. 10 years for major rehabilitation;
- b. 10 years for conversion;
- c. 3 years for renovation other than major rehabilitation or conversion.

All organization or agencies applying for San Bernardino County Emergency Shelter Operations and/or Shelter Renovations ESG funding must document compliance with the established housing codes, habitability standards for shelters by completing a Lead-based Paint and Habitability Requirements Checklist Form for Emergency Shelters which shall be included with all invitations to bid on ESG funds. Inspections to determine if emergency shelters meet the ESG minimum standards do not need to be evaluated by a certified inspector; inspections may be conducted by ESG Program staff, a City inspector, or a staff person from another program that requires inspections (i.e.: Section 8). The inspection must determine whether all aspects of the ESG minimum habitability standards and lead-based paint requirements (further discussed below) have been met and shall be accompanied by photo documentation of the existing conditions.

If deficiencies are identified at the time of application, applicant must demonstrate a plan is in place to appropriately address and close out all deficiencies prior to contract execution. Applicant will also be required to provide proof that all deficiencies have been addressed, including approvals by local permitting authorities (if applicable) accompanied by any necessary clearance reports prior to contract execution. As part of the Due Diligence Process, a County Representative will schedule a site inspection to verify and photo document all conditions disclosed in the Lead-based Paint and Habitability Requirements Checklist Form for Emergency Shelters to ensure eligibility of the project site prior to contracting. Should deficiencies be identified, the subject shelter site will not be eligible for ESG funding.

C. Lead-Based Paint Requirements

Lead-based paint requirements exist to protect vulnerable families from potential hazards. Federal lead-based paint requirements apply any time federal funds are used to provide housing assistance and when the living space or unit was built prior to 1978. Comprehensive guidance for understanding ESG lead based paint requirements along with all compliance are available within Attachment O, Lead Based Paint Compliance Guidance and Forms.

The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M and R apply to all shelters assisted with ESG funding and all housing occupied by program participants.

Under ESG, a lead-based paint visual assessment must be completed for all units that meet all the three following conditions:

- The household living in the unit is being assisted with ESG financial assistance (rent assistance, utilities assistance, utility/security deposits, or arrears); and
- The unit was constructed prior to 1978; and
- A child under the age of six is or will be living in the unit.

Under ESG, lead requirements apply regardless of whether a household is remaining in an existing unit or moving into a new unit. The visual assessment must be completed prior to ESG assistance being provided, and annually thereafter. Subrecipient (ESG program staff) are responsible for ensuring that property owners and managers meet the lead-based paint requirements.

Exceptions to the Rule

There are certain exceptions to the rule as detailed under 24 CFR 35.115(a)(1) through (13). Visual assessments by ESG staff are not required if any of the conditions outlined below apply:

24 CFR 35.115(a) – Subparts B through R of 24 CFR Part 35 do not apply to projects that meet the criteria described in as follows:

- (1) A residential property for which construction was completed on or after January 1, 1978, or, in the case of jurisdictions which banned the sale or residential use of lead-containing paint prior to 1978, an earlier date as HUD may designate (see [§ 35.160](#)).
- (2) A zero-bedroom dwelling unit, including a single room occupancy (SRO) dwelling unit.
- (3) Housing for the elderly, or a residential property designated exclusively for persons with disabilities; except this exemption shall not apply if a child less than age 6 resides or is expected to reside in the dwelling unit (see definitions of “housing for the elderly” and “expected to reside” in [§ 35.110](#)).
- (4) Residential property found not to have lead-based paint by a lead-based paint inspection conducted in accordance with [§ 35.1320\(a\)](#) (for more information regarding inspection procedures consult the 1997 edition of Chapter 7 of the HUD Guidelines). Results of additional test(s) by a certified lead-based paint inspector may be used to confirm or refute a prior finding.
- (5) Residential property in which all lead-based paint has been identified, removed, and clearance has been achieved in accordance with [40 CFR 745.227\(b\)\(e\)](#) before September 15,

2000, or in accordance with [§§ 35.1320](#), [35.1325](#) and [35.1340](#) on or after September 15, 2000. This exemption does not apply to residential property where enclosure or encapsulation has been used as a method of abatement.

(6) An unoccupied dwelling unit or residential property that is to be demolished, provided the dwelling unit or property will remain unoccupied until demolition.

(7) A property or part of a property that is not used and will not be used for human residential habitation, except that spaces such as entryways, hallways, corridors, passageways or stairways serving both residential and nonresidential uses in a mixed-use property shall not be exempt.

(8) Any rehabilitation that does not disturb a painted surface.

(9) For emergency actions immediately necessary to safeguard against imminent danger to human life, health or safety, or to protect property from further structural damage (such as when a property has been damaged by a natural disaster, fire, or structural collapse), occupants shall be protected from exposure to lead in dust and debris generated by such emergency actions to the extent practicable, and the requirements of [subparts B](#) through [R of this part](#) shall not apply. This exemption applies only to repairs necessary to respond to the emergency. The requirements of [subparts B](#) through [R of this part](#) shall apply to any work undertaken subsequent to, or above and beyond, such emergency actions.

(10) If a Federal law enforcement agency has seized a residential property and owns the property for less than 270 days, [§§ 35.210](#) and [35.215](#) shall not apply to the property.

(11) The requirements of [subpart K of this part](#) do not apply if the assistance being provided is emergency rental assistance or foreclosure prevention assistance, provided that this exemption shall expire for a dwelling unit no later than 100 days after the initial payment or assistance.

(12) Performance of an evaluation or lead-based paint hazard reduction or lead-based paint abatement on an exterior painted surface as required under this part may be delayed for a reasonable time during a period when weather conditions are unsuitable for conventional construction activities.

(13) Where abatement of lead-based paint hazards or lead-based paint is required by this part and the property is listed or has been determined to be eligible for listing in the National Register of Historic Places or contributing to a National Register Historic District, the designated party may, if requested by the State Historic Preservation Office, conduct interim controls in accordance with [§ 35.1330](#) instead of abatement. If interim controls are conducted, ongoing lead-based paint maintenance and reevaluation shall be conducted as required by the applicable subpart of this part in accordance with [§ 35.1355](#).

If a condition described above applies, ESG program staff shall document the condition by completing the ESG Lead Based Paint Screening Worksheet and placing a copy in the applicant's case file.

It may be helpful for grantees to think about the requirements in two categories:

Disclosure

The following Lead-based paint disclosures must be provided to client households in ALL housing units constructed prior to 1978.

1. Disclosure of Information on Lead-Based Paint and/or Lead-Based Paint Hazards form for rental properties in which the Lessor discloses whether the lead -based paint is present in the subject property's paint history,
2. Protect Your Family from Your Home (booklet or pamphlet).

The pamphlet describes any known current or previous lead-based paint hazards. To document tenant's receipt of above-mentioned pamphlet, subrecipient shall collect signatures on the Disclosure of Information on Lead-Based Paint and/or Lead Hazards Acknowledgement form. The form shall be fully completed, executed, and dated by the lessors, agents, and lessees, certifying to the accuracy of their statements, to the best of their knowledge.

The tenant must receive the pamphlet before moving into the unit. Disclosures post-dating move-in are not accepted. The fully executed form is to be retained in the applicant's ESG client file and shall be submitted with the first claim for reimbursement for the subject expense. If Subrecipient can document the tenant received the pamphlet previously, Subrecipient is not required to provide it again.

Visual Assessment

Pursuant to § 35.1015, a visual assessment of all painted surfaces, including the unit, common areas servicing the unit, and the exterior surfaces of the building in which the unit is located must be conducted prior to providing ESG financial assistance. A visual assessment to identify any deteriorated paint surfaces is required prior to initial funding and on an annual basis thereafter (while assistance is being provided).

Visual assessments must be conducted by a HUD-Certified Visual Assessor. It is important to note that a HUD-Certified Visual Assessor is not equivalent to a Certified Clearance Examiner. Anyone may become a HUD-Certified Visual Assessor by successfully completing a 20-minute online training on HUD's website at:

<http://www.hud.gov/offices/lead/training/visualassessment/h00101.htm>

The training teaches individuals how to identify deteriorated paint and how deteriorated paint must be treated. Subrecipients shall have at least two ESG Program employees always trained during the term of the contract to complete the visual assessments in-house so as not to delay service delivery. Verification of the listing of trained staff will be verified by the County at monitoring.

If ESG financial assistance is being used to help a client move into a new unit, a physical inspection of the unit must also be conducted to ensure it meets the minimum habitability

standards. In cases where both a lead-based paint visual assessment and a habitability inspection are required, the most efficient and cost-effective solution would be to have the same individual complete both at the same time, if the inspector has taken the Visual Assessor Certification course. Note that the cost of conducting visual assessments and habitability inspections is an ESG eligible expenses under the Financial Assistance category.

At intake, it should be noted on the Application Form if there will be any child in the household younger than 6 years. This information should be provided to the habitability inspector prior to their examination of the proposed rental unit.

Paint Stabilization, and Maintenance

Furthermore, per § 35.1015, if a dwelling unit receives ESG assistance, the subrecipient shall also conduct the following activities for the unit:

- Paint stabilization of each deteriorated paint surface, and clearance, in accordance with §§ 35.1330(a) and (b), before occupancy of a vacant dwelling unit or, where a unit is occupied, immediately after receipt of Federal assistance; and
- The grantee or participating jurisdiction shall require the incorporation of ongoing lead-based paint maintenance activities into regular building operations, in accordance with § 35.1355(a), if the dwelling unit has a continuing, active financial relationship with a federal housing assistance program, except that mortgage insurance or loan guarantees are not considered to constitute an active programmatic relationship for the purposes of this part.
- The grantee or participating jurisdiction shall provide a notice to occupants in accordance with §§ 35.125(b)(1) and (c), describing the results of the clearance examination.

Essential service activities, such as, counseling, case management, street outreach, referrals to employment, etc., are exempt and excluded from the lead-based paint visual inspection requirements.

The Lead-Based Paint Property Owner Certification Form is required where paint stabilization was completed as it certifies all identified paint stabilization was completed in accordance with the guidelines.

D. Environmental Review

Federally funded projects are subject to an environmental review process in 24 CFR Part 58. The County acts on behalf of HUD as the responsible entity to determine if the ESG activity complies with the requirements in 24 CFR Part 58. Any subrecipient requesting funds for activities under ESG may be subject to full or partial environmental review as applicable. The County will define the level of review required and complete and document all environmental requirements. County staff will process the applicable environmental review in the HUD environmental reporting system known as HUD Environmental Review Online System (HEROS).

The process will be complete before the project can be approved and funded and the agreement is executed with the Subrecipient.

Subrecipient and its contractors shall not rehabilitate, convert, or renovate a shelter or prospective shelter until HUD has performed an environmental review under 24 CFR part 50 and Subrecipient has received HUD approval to continue. Subrecipient shall supply all available, relevant information necessary for HUD to perform any environmental review required by 24 CFR Part 50. Sub-recipient must carry out mitigating measures required by HUD or select alternate eligible property. HUD may eliminate from consideration any application that would require an Environmental Impact Statement (EIS).

V. Client Confidentiality

A. General Requirements

All information about the applicant/client is confidential. Disclose information only for the purpose of determining program eligibility, providing benefits, or investigating possible violation of federal, state and local regulation(s) associated with ESG delivery and never in a setting where members of the public can hear the conversation. In accordance with 24 CFR 576.500(x):

- a. all records containing personally identifying information of any individual or family who applies for and/or receives ESG assistance must be kept secure and confidential;
- b. the address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under ESG must not be made public, except with the written authorization of the person responsible for operation of that shelter; and
- c. the address or location of any housing of a program participant will not be made public, except as provided under a pre-existing privacy policy of the recipient or subrecipient and consistent with state and local laws regarding privacy and obligations of confidentiality.

Subrecipients must have policies and procedures that ensure all client information and records are secure and confidentially maintained in a locked cabinet or area. Subrecipients' officers, employees and agents must be aware of and comply with Subrecipients' confidentiality policies and procedures.

B. Electronic Confidentiality

Electronic collection of client information requires procedures for ensuring confidentiality. The following guidelines apply to the use of a computer:

- The computer terminal(s) used must be in a secure location, limiting access to only those persons who have a legitimate interest in and are responsible in viewing client records.
- The computer monitor must be cleared (or a screen saver activated) immediately after accessing a client record.
- The computer terminal must be on a "locked" mode or turned off if the terminal is unattended.
- Access to the HMIS program shall be given to authorized staff persons and only insofar as access is necessary for performing the work required for the ESG program.

C. Victims of Domestic Violence

Subrecipient must implement procedures to ensure confidentiality of records pertaining to any individual who is provided family violence prevention or treatment services. Victim information cannot be disclosed to any third party without consent of the victim.

Victim Subrecipients are prohibited from entering data in HMIS; however, they are required to maintain comparable databases of their own design which provide aggregate information and data consistent with HMIS data collection requirements. Projects serving survivors of domestic violence where the recipient is not a victim services provider are required to enter data in their HMIS.

Subrecipient must instruct all staff that the address of a domestic violence provider's shelter location will not be made public without permission of the provider.

Federal rules **require** each Subrecipients to enter client data into a Homeless Management Information System (HMIS) or for victim service providers, a comparable database.

Each grantee **must** follow all state and federal laws governing HMIS, including collecting informed written consent from program participants, not denying service based solely on program participant refusal to provide data to an HMIS, protecting program participant confidentiality, not collecting personally identifying information from program participants that are victims of domestic violence, and other requirements defined in [VAWA Reauthorization Section 605 and in accordance with 24 CFR 576.409\(c\)\(1\)](#). Written notification must be provided to participants of their VAWA rights when beginning of ESG rental assistance, the termination of rental assistance, and the notification of eviction.

No individual or family is denied admission to or removed from the emergency shelter on the basis or as a direct result of the fact the individual or family is or has been a victim or domestic violence, dating violence, sexual assault or stalking.

D. Release of Information

Client information (including identifying the person is a client) should not be released without written authorization from the client. A Release of Information form must be completed by the applicant at the time of intake.

Client refusal to provide such authorization cannot be the basis for denying program services to otherwise eligible clients.

Release forms must be time-limited and specific as to with whom and what information will be shared.

VI. Termination, Grievance and Conflict of Interest Policies

A. Termination or Denial of Assistance

Subrecipient must have written denial, termination, and grievance policies and procedures. The policies and procedures should be readily available to program participants either in writing or by posting them in a public place. Copies and explanation of the policies and

procedures shall be provided directly to any client when denial, termination or other action affects the client's qualification for assistance. Notice of any adverse action such as a denial or termination of services shall be provided in writing and include the specific reason(s) for the action and provide a process the applicant can follow to request of the decision.

If Subrecipient is terminating rental assistance to the program participant, they must immediately notify the landlord of the date rental assistance for their tenant will end.

Termination from assistance does not prevent Subrecipient from providing further assistance, to the same household or individual if they are determined eligible for such assistance later.

B. Grievance and Appeals Process

Subrecipient is required to have an established process for addressing client grievances for decisions, including termination or reduction of benefit, denial of benefit or other grievance. At a minimum, the process must include the following components:

- Informs the participant/applicant of the policy and/or policy must be posted in an area specific by the policy and in general locations in which a client/applicant is expected to be;
- Informs the participant/applicant that they may contest any Subrecipient or Subrecipient's decision that denies (for any reason) or limits eligibility of participant/applicant and/or terminates or modifies any benefits;
- Allows any aggrieved person a minimum of thirty days within which to request an administrative review;
- Informs the applicant/participant of their right to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the decision;
- Informs OHS of the request for administrative review within 10 days of receiving the request;
- Informs the applicant/participant and OHS in writing of the final determination and basis for the decision within ten days of the determination.

Any person or persons designated by Subrecipient can complete the administrative review, other than the person who made or approved the decision under review or a subordinate of this person.

OHS retains the right to require modification of any review or appeal process that OHS determines does not meet basic principles for notification, instruction, time allowance, impartiality or other necessary component.

Subrecipients must make accommodations for clients who have language or disability barriers that would prevent them from participating in the appeals process.

OHS retains the right to require modification of any review or appeals process that in its determination does not meet basic principles for notification, instruction, time allowance, impartiality and access.

C. Conflict of Interest

1) Organizational

The provision of any type or amount of ESG assistance may not be conditioned on an individual's or household's acceptance or occupancy of emergency shelter or housing owned by Subrecipient or an affiliated organization. A Subrecipient is prohibited from conducting a participant's intake assessment to determine program eligibility if the participant resides in housing where the Subrecipient has ownership interest. Subrecipient would need to find another independent organization that is also an ESG grantee to do the intake assessment and ensure that all program participants are eligible even if the Subrecipient has a waiver of the conflict-of-interest requirements. Conflict of interest waivers regarding rent assistance and rental agreement requirements can only be approved by HUD. If a Subrecipient wishes to apply for a waiver, they should contact the OHS homeless program coordinator or manager for guidance in submission of a waiver request which must be approved by OHS who will then submit to HUD. See 24 CFR 576.404(a).

Subrecipient must keep records to show compliance with ESG program organizational conflicts-of-interest requirements.

2) Individual

For the procurement of goods and services, Subrecipient must comply with the codes of conduct and conflict of interest requirements under 24 CFR 85.36 (for governments) or 24 CFR 84.42 (for private nonprofit organizations).

Persons for whom the Conflict-of-Interest requirements apply include any person who is an employee, agent, consultant, officer, or elected or appointed official of the Subrecipient agency. No person who exercises or has exercised any functions or responsibilities with respect to activities assisted under the ESG program, or who is in a position to participate in a decision-making process or gain inside information with regard to activities assisted under the Program, may obtain a financial interest or benefit from an assisted activity; have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity; or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has family or business ties, during his or her tenure or during the one- year period following his or her tenure.

Upon the written request of OHS, HUD may grant an exception to the provisions of this paragraph on a case-by-case basis. Subrecipients wishing an exception must submit requests to OHS for review and forwarding to HUD. There is no guarantee that an exception will be approved.

VII. Fair Housing

A. Affirmative Outreach

Subrecipient must communicate and make known that use of ESG funded facilities, assistance and services are available to all on a nondiscriminatory basis. Subrecipient must develop and

implement affirmative outreach written procedures and communication tools and materials to inform persons without regard to race, color, ethnicity, religion, sex, age, national origin, familial status, or disability, how to obtain access to facilities and services. If it appears the procedures Subrecipient intends to use to accomplish this will not reach persons of any race, color, religion, sex, age, national origin, familial status, or disability who may qualify for those activities and services, Subrecipient must establish additional procedures to ensure those persons are made aware of assistance opportunities. Outreach efforts must comply with Program Standard #3—*Emergency Shelter Operations (Safety and Accommodations for Special Populations)*.

Reasonable accommodations for persons with disabilities must be available to ensure disabled participants have an equal opportunity to utilize housing, including shelters, and receive essential services. Greater levels of accessibility may be required for some shelters in compliance with The Americans with Disabilities Act.

B. Nondiscrimination

Subrecipient is required to comply with all state and federal statutes relating to nondiscrimination. Subrecipient may not take any of the following actions based on race, color, national origin, religion, sex, familial status or handicap:

- Refuse to rent housing or provide services
- Make housing or services unavailable
- Deny a dwelling or service
- Set different terms, conditions or privileges for rental of a dwelling or obtaining services
- Provide different housing services or facilities or different services
- Falsely deny that housing is available for inspection or rental or that services are available
- Deny anyone access to a facility or service.

Equal Access to Housing Regardless of Sexual Orientation or Gender Identity

On February 3, 2012, HUD published a final rule in the Federal Register entitled, “Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity”. This rule became effective March 5, 2012, and was amended in September 2016 with 24 CFR 5.106. The rule provides a regulatory provision that prohibits considering a person’s marital status, sexual orientation, or gender identity in making homeless housing assistance available. Refer to: <https://www.hudexchange.info/resources/documents/Equal-Access-Final-Rule-2016.pdf> for more information. Gender identity is defined as the gender with which a person identifies, regardless of the sex assigned to that person at birth and regardless of the person's perceived gender identity. Perceived gender identity means the gender with which a person is perceived to identify based on that person's appearance, behavior, expression, other gender related characteristics, or sex assigned to the individual at birth or identified in documents. Subrecipients are required to establish equal access on gender identity policies (in line with federal rules and the requirements in this document) for:

- Program admissions
- Occupancy

- Operating policies and procedures (including privacy and security policies)

VIII. Recordkeeping

A. Client File Documentation

Sufficient records must be established and maintained to enable OHS and HUD to determine whether ESG requirements are being met. Sub-recipient must make sure any Subrecipients assisting Subrecipient with the ESG program also maintain appropriate and complete records.

Documentation of client eligibility and services received must be maintained in printed or electronically saved client case files, including files for applicants found to be ineligible. File documentation will be the basis of OHS monitoring to ensure Sub-recipient follows program requirements and HUD regulations.

At the minimum, client files must contain the following, if applicable to Subrecipient's service to the program participant:

- Verification of use of coordinated entry;
- Signed Release of Information;
- Intake form and assessment of household needs;
- homeless or at risk of homelessness verification;
- Evidence applicant has no subsequent housing options and lacks sufficient resources to retain housing, but is not homeless;
- Rent Reasonableness documentation;
- Habitability Standards verification;
- Lead-based Paint visual assessment;
- Signed Lease Agreement;
- Signed Rental Assistance Agreement;
- Verification of client income and assets;
- Amount and type of essential emergency shelter services provided;
- Re-evaluations of eligibility;
- Housing Plan and housing assistance provided;
- Verification of outstanding rent arrears;
- Case notes;
- Evidence of referrals from CES and/or other coordinating agencies;
- Documentation of payments made on client's behalf; **and**
- Written notice of program termination.

B. Electronic Files

If client file documents and signatures or policy documents are collected and maintained electronically, required documentation must be made available to OHS in paper form when requested.

C. Records Retention

Subrecipients shall retain all program records pertinent to client services and expenditures paid with ESG funds in a manner consistent with the requirements of state and federal law.

This includes, but is not limited to, those requirements listed in Administrative Rule,

Operations Manual and Special Schedules. Currently, program records including client files must be retained for five (5) years. Fiscal records, which include books, documents, papers, plans, and agency records that document all program expenditures, or such longer period as may be required due to any audit, controversy or litigation arising out of, or relating to, program use.

in accordance with the recordkeeping (Record Retention) requirement as defined by 24 CFR 576.500(y) emergency shelters that are subject to a 10-year minimum period of use records must be retained for at least 10 years from the date that ESG funds were first obligated for the major rehabilitation or conversion of the building and for program participant files records must be retained for at least 5 years after the expenditure of all funds from the grant under which the program participant was served.

IX. Financial Management

A. Administration

In accordance with 576.203(a)(2), Obligation, Expenditure and Payment requirements, funds allocated to the County must be obligated within 180 days after the date that HUD signs the grant agreement (or a grant amendment for reallocation of funds) with the metropolitan city, urban county, or territory, the recipient must obligate all the grant amount, except the amount for its administrative costs. This requirement is met by an agreement with, or a letter of award requiring payment to, a subrecipient; a procurement contract; or a written designation of a department within the government of the recipient to directly carry out an eligible activity. If the recipient is an urban county, this requirement may also be met with an agreement with, or letter of award requiring payment to, a member government, which has designated a department to directly carry out an eligible activity.

The County may use up to the allowable limits of reimbursed costs during the grant period for administrative costs, **which is not to exceed 7.5% for annual ESG and up to 10% for ESG-CV**. The County applies the federally allowed 10% de minimis rate for indirect costs. Allowable administrative costs are those costs associated with the general management of the organization. These costs may include but are not exclusive to: executive management; human resources; accounting, board expenses; general insurance; agency-wide audit; and space and equipment costs attributable to the agency as a whole.

Administrative costs must be charged to grant cost centers based on either a cost allocation plan or through use of an approved indirect cost rate in accordance with 2 CFR Part 200.40 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (also known as the “Super Circular”).

Direct costs are those costs that can be identified specifically with a particular final cost objective, such as Federal award, or other internally or externally funded activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy. Direct salaries, supplies and materials, and travel are some examples of direct costs.

Each awarded Subrecipient is eligible to request a de minimis rate of up to 10% for indirect

costs. If an agency has been approved for above this amount, a letter from the federal agency approving an Indirect Cost Rate Proposal (ICRP) greater than the 10% de minimis must be provided to the County supporting that ICRP.

In accordance with 24 CFR 576.203(b); 24 CFR 576.500(u), the County must meet the prescribed draw down an expenditure rate by expending and drawing down funds from each year's grant at least once during each quarter of the program year. Additionally, the County must ensure to expend 100% of its grant award for eligible costs within 24 months after the date HUD signed the Agreement and the total amount of the recipient's fiscal year grant used for street outreach and emergency shelter activities did not exceed the greater of:

- a. 60% of the recipient's fiscal year (FY) grant; or
- b. the amount of FY 2010 grant funds committed for homeless assistance activities.

The County shall utilize PR91 reports each grant year to monitor expenditures ensuring funds are fully expended. In addition to monitoring expenditures via the PR91 reports, the County shall monitor the subrecipient's monthly expenditures to ensure the timely expenditure of awarded funds and take necessary action if required.

Additionally, quarterly reports must be submitted to HUD regarding the ESG-CV grant, including data on program participants served, expenditure information, and narratives on unique CARES Act activities, within 30 days after the close of each quarter (January 30, April 30, July 30, October 30).

BUDGET AND GRANT MANAGEMENT

1. Grant Management

- a. Budget Setup – Initial (Upon announcement of allocations from HUD)
 - i. Initial -Upon notification from HUD of the final allocation amounts, the Program Specialist I (PS I) will set up the overall budget reflecting the total grant with the Administration set-side not to exceed the regulatory 7.5% percent. The set-up will entail the PS I completing the ESG Allocation Set-Up/Transfer/Project Close-Out form (Attachment T) which will clearly indicate the amounts that are being allocated at the time of set-up. The ESG Allocation Set-Up/Transfer/Project Close-Out form (Attachment T) is to be reviewed and approved by the following personnel:
 1. Program Specialist I
 2. Housing Administrative Manager
 3. Chief of Homeless Services
 - ii. Upon approval of the initial budget, the PS I will:
 1. Set the budgets up in the IDIS and HDS systems;
 2. Provide copies of the ESG Allocation Set-Up/Transfer/Project Close-Out form along with copies of IDIS PR-91 ESG Financial Summary Report and a copy of the HDS funds management report to the PS I for review and verification
 3. Forward to Housing Administrative Manager for final

verification and sign-off

4. Place all relevant documentation into the grant management file folder for reference.
- b. Budget Setup – Modified (Upon approval of Annual Action Plan)
- i. After approval of the Annual Action Plan for the forthcoming plan year, the PS I will set up the ESG grant budget reflecting the total grant with the activity allocations, as approved by the Board, along with the Administration set-side not to exceed the regulatory 7.5% percent. The set-up will entail the PS I completing the ESG Allocation Set-Up/Transfer/Project Close-Out form (Attachment T) which will clearly indicate the amounts that are being allocated at the time of set-up. The ESG Allocation Set-Up/Transfer/Project Close-Out form (Attachment T) is to be reviewed and approved by the following personnel:
 1. PS I
 2. Housing Administrative Manager
 3. Chief of Homeless Services
 - ii. Upon approval of the modified budget, the PS I will:
 1. Set the budgets up in the IDIS and HDS systems;
 2. Provide copies of the ESG Allocation Set-Up/Transfer/Project Close-Out form along with copies of IDIS PR-91 ESG Financial Summary Report and a copy of the HDS funds management report to the PS I for review and verification
 3. Forward to Housing Administrative Manager for final verification and sign-off;
 4. Place all relevant documentation into the grant management file folder for reference.
- c. Budget Setup – Subrecipient Awards
- i. After the approval of the Subrecipient agreements, the PS I will set up the Subrecipient budgets based upon the approved activities and allocation amounts for each activity, as reflected in the Subrecipient agreement. The set-up will entail the PS I complete the ESG Allocation Set-Up/Transfer/Project Close-Out form (Attachment T) which will clearly indicate the amounts that are being allocated for each activity for the respective Subrecipient. The ESG Allocation Set-Up/Transfer/Project Close-Out form (Attachment T) is to be reviewed and approved by the following personnel:
 1. PS I
 2. Housing Administrative Manager
 3. Chief of Homeless Services
 - ii. The PS I will:
 1. Set the budgets up in the IDIS and HDS systems;
 2. Provide copies of the following to the ECD Analyst II:
 - a. ESG Allocation Set-Up/Transfer/Project Close-Out form;
 - b. IDIS PR-91 ESG Financial Summary Report and of the HDS funds management reports;
 - c. Executed Subrecipient agreement to the PS I for review and verification.

3. Forward to Housing Administrative Manager for final verification and sign-off;
4. Place all relevant documentation into the grant management and Subrecipient file folder for reference.

2. Budget Management

- a. On a quarterly basis, the PS I will run a PR-91 ESG Financial Summary Report and an HDS funds requests report for review. The PS I will reconcile IDIS and HDS data for tracking and grant management purposes. Any identified discrepancies are to be corrected and remediated, at that time. PS I will be responsible for working with the County's fiscal staff and the Subrecipients fiscal staff to resolve discrepancies. Upon identification of resolutions (i.e., transfers, journal entries, etc.) approvals will be obtained by the Housing Administrative Manager or Chief of Homeless Services, as which level deemed appropriate.
- b. As part of the Budget Management process, the PS I will be ensuring that any budget amendments (See Section C.2) that were approved during the previous quarter have been properly processed and documented. The PS I will also ensure during the quarterly budget reconciliation process that entries in IDIS are accurate and consistent with the Subrecipient agreements and approved budget amendments.

3. Expenditure and Performance Goals Management - Subrecipients

- a. The PS I will track the Subrecipient's expenditure performance and goal performance using the Performance Tracking Tool (Attachment N). The Performance Tracking Tool is a data entry-based spreadsheet that allows staff to assess at an expenditure and goal performance level.
- b. The PS I will review the Performance Tracking Tool on a quarterly basis to evaluate the overall performance to determine if Subrecipient is making reasonable progress meeting their expenditures and performance goals. If it is deemed the Subrecipient is not, the PS I will discuss the Subrecipient's performance with the Housing Administrative Manager and determine if intervention (i.e. technical assistance, workout plan to meet goals, modification to agreement, reprogramming of funding, etc.) may be necessary. A recommendation will be made to the Chief of Homeless Services and a plan of action determined, at that time.

4. Expenditure and Performance Goals Management – County

- a. In addition to the PSI reviewing the Subrecipients performance for the purposes of managing their Subrecipient contract, on a quarterly basis, the PS I will provide the Housing Administrative Manager a copy of the PR 91 – ESG Financial Summary report for evaluation of the County's overall performance of the grant, inclusive of all Subrecipients and activities to ensure the County is not at risk of:
 - i. Not meeting obligations requirements in a timely manner;
 - ii. Not meeting expenditure requirements in a timely manner;
 - iii. Inconsistent reporting values due to inadequate tracking of IDIS budgets and contract amounts;

- iv. Not accurately reporting activity amounts due to IDIS not being updated upon the approval of a budget amendment;
- v. Losing funds to deobligation.

B. Program Match

Except as provided in the next paragraph, OHS will require Subrecipient to make matching contributions in an amount that equals one hundred percent (100%) the amount of ESG funds allocated by OHS. Subrecipients are required to meet match requirements established in 576.201 and 2 CFR 200.306.

Obtain matching contributions from any source, including any Federal (non-ESG) source, as well as state, local, and private sources. Use of any Federal source must not prohibit those funds from being used as ESG match and not already be matched with ESG funds. Subrecipient must ensure the laws governing any funds used as matching contributions do not prohibit the use of those funds as match.

ESG-CV FUNDING HAS NO MATCH REQUIREMENT

ESG Match Criteria

- The matching contribution must be made after the date that HUD and OHS sign the ESG Grant Agreement;
- Cash contributions must be expended within the expenditure deadline in 576.203;
- Non-cash contributions must be made within the expenditure deadline in 576.203.
- Contributions used to match a previous ESG grant or other source requiring a match may not be used to match current or subsequent ESG grants;
- Contributions that have been or will be counted as satisfying a match requirement of other federal funds may not be used as match for ESG funding;
- The matching funds must be used for ESG eligible services and activities; **and**
- Are not included as contributions to any other Federal awards;
- Are necessary and reasonable for accomplishment of ESG project or program objectives;
- Allowable under Part 200 Subpart E- Cost Principles.
- Non-cash contributions made on or after January 6, 2016, must be valued in accordance with the requirements at 2 CFR 200.306(d) through (j) and 24 CFR 576.201 (c).

Eligible types of matching contributions

The matching requirement may be met by the following:

(1) Cash contribution which is cash expended for allowable costs, as defined in OMB Circulars A-87 (2 CFR part 225) and A-122 (2 CFR part 230), of the recipient or subrecipient.

(2) Noncash contributions which is the value of any real property, equipment, goods, or services contributed to the recipient's or subrecipient's ESG program, provided that if the recipient or subrecipient had to pay for them with grant funds, the costs would have been allowable. Noncash contributions may also include the purchase value of any donated building.

Calculating the amount of noncash contributions

(1) To determine the value of any donated material or building, or of any lease, the recipient must use a method reasonably calculated to establish the fair market value.

(2) Services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work in the recipient's or subrecipient's organization. If the recipient or subrecipient does not have employees performing similar work, the rates must be consistent with those ordinarily paid by other employers for similar work in the same labor market.

(3) Some noncash contributions are real property, equipment, goods, or services that, if the recipient or subrecipient had to pay for them with grant funds, the payments would have been indirect costs. Matching credit for these contributions must be given only if the recipient or subrecipient has established, along with its regular indirect cost rate, a special rate for allocating to individual projects or programs the value of those contributions. The value of the time and services contributed by volunteers. Value of volunteer time will be calculated using the minimum wage.

If a building is donated by the recipient or its subrecipient, the County must ensure that:

- the value of the match was determined as specified in 2 CFR 200.306(d) and (l)(1);
- depreciation on the building was not counted and will not be counted as match or charged to any Federal award; and
- the building was donated for long-term use in the recipient's ESG program, as evidenced by a recorded deed or use restriction that is effective for at least 10 years after the donation date.

If the building was donated by a third party, the County must ensure that:

- The recipient counts as match only the depreciation of the building and fair rental charges for the land for each year the building is used for the recipient's ESG program or, if the building was donated for long-term use in the recipient's ESG program, the fair market value of the capital assets, as specified in 2 CFR 200.306(h)(2), (l), and (j); and
- If the building was donated for long-term use in the recipient's ESG program, the donation was evidenced by a recorded deed or use restriction that is effective for at least 10 years after the donation date.

Services provided by individuals/volunteer services must be valued at rates consistent with those ordinarily paid for similar work by Subrecipient. If Subrecipient does not have employees performing similar work, the rates must be consistent with those ordinarily paid by other employers for similar work in the same labor market.

The value of any real property, equipment, goods or services can be used as match provided the costs would be allowable if Subrecipient had purchased them. Some non-cash contributions would be considered indirect costs if purchased by Subrecipient; match for these contributions may be given only if Sub-recipient has established a special indirect cost rate for allocating the value of those contributions to individual projects or programs.

Costs paid by program income

Costs paid by program income shall count toward meeting the recipient's matching

requirements, provided the costs are eligible ESG costs that supplement the recipient's ESG program.

Program Services Match

The County will obtain detailed match reports from the subrecipients with their monthly reimbursement requests to track the match for program costs incurred by the grant. Additionally, ESG staff shall obtain quarterly reports from the OHS fiscal department to track the match contributions for administrative costs incurred by the grant. Supporting documentation (i.e. award letter) of the availability of funding being used by the subrecipient as a match must be obtained prior to the award of the ESG contract. The County must ensure the match is tracked by grant number and the total match requirement for the respective grant number is met within the 24-month time.

The match reports will capture the following data elements:

- Grant Number the match is being applied to
- Date of Match
- Source of Match
- Amount of Match
- Use of the Match sources

At least bi-annually, the County will request all corresponding back-up documentation to certify the match submitted in the monthly match reports. The County will review the documentation for eligibility of cost, use, source, date of match, and applicability to grant number. Upon eligibility verification the match will be counted toward the respective grant number, adjustments will be made accordingly for any amounts deemed ineligible. The County will update its comprehensive Match Log that tracks all match for the grant number/year. The log must show the amount of expenditures applied to the grant number, as well as the amount of match applied to the grant number to ensure the County is and will be able to meet its match requirements within prescribed 24 month period applicable to the grant number. **Please note: any excess match may be used for a subsequent grant number/year provided the match meets the eligibility criteria and eligible dates.**

The backup documentation to be reviewed to verify match must include the following: contract/award of match, general ledger/fiscal accounting report, invoices/proof of expenditures covered by match; if in kind, description of match and valuation methodology used), which reflects records of the source and use of contributions made to satisfy the matching requirement. Records must indicate that the match was expended with the ESG expenditure period of the grant number the match is being applied, before the ESG deadline and that the costs were allowable costs under the ESG program. To the extent feasible, volunteer services must be supported by the same methods that Subrecipient uses to support the allocation of regular personnel costs.

Administrative Match

While the subrecipients meet the required match provisions for the direct services funded by the program that they render, the County generally meets the match requirement for

administrative costs. Should the County meet its own match requirement, the County will process the ESG administrative costs on a 50/50 pro-rata basis, quarterly. For example, if the ESG administrative costs for salaries and legal services totaled \$4,000 for the subject quarter and all costs were deemed eligible, \$2,000 of the eligible costs will be charged directly to ESG and the remaining \$2,000 will be charged to the funding source, used as a cash match.

However, there are instances when the subrecipients provide match more than their requirement. If there is excess eligible match for the grant number, the County shall, at its sole discretion, determine if the excess match will be used to meet the match requirements applicable to any administrative costs incurred by the County.

C. Funds Disbursement

1) Request for Funding Documentation

Subrecipient must retain supporting documentation of all costs charged to the ESG grant and be able to provide evidence that grant funds were spent on allowable costs. Each reimbursement request must be accompanied by the required documentation as identified on the ESG Claims Reimbursement Checklist (Attachment Q). Upon receipt of the request, the PS I will review the submission to ensure compliance with the checklist and progress the request to review. If the reimbursement request is deemed to be incomplete by the PS I, it will be returned to the subrecipient until such a time that an acceptable request is submitted.

Each reimbursement must be received within 30 days after the close of the billing period.

The PS I will review the reimbursement request and supporting documentation for completeness to ensure all costs are eligible costs, in accordance with the ESG regulations and 2 CFR Part 200, and all costs are adequately and appropriately documented. If costs are deemed to need additional supporting documentation or have been determined to be ineligible, the subrecipient will receive, from the County, a reimbursement deduction worksheet identifying the ineligible costs and an opportunity to provide supporting documentation. If subrecipient is able substantiate costs and submit supporting documentation, County will reconsider the deduction. All reimbursement requests that are reviewed and have been deemed complete will be processed and payment made to subrecipient within 30 days of approval, approval will not be granted until the submission is determined to be complete and all deductions, if any, are finalized.

2) Budget Amendment Requests

During each program year, all budget amendments require OHS approval. Submit a Budget Amendment Request form electronically to the ESG Grant Administrator. At the discretion of OHS, additional information may be required. Each Subrecipient may request budget adjustments to moving funding within eligible activities twice during the program year. Those adjustments may be handled administratively and will be subject to the County of San Bernardino's Citizen Participation Plan which governs how and when changes are made to the Program and what actions are required to remain in accordance with 24 CFR 576.200(b) and CPD 21-08, Section F.2.d.

All scope of work amendments requires OHS approval. Submit a written Budget Amendment Request electronically to: OHSfinanceinbox@hss.sbcounty.gov.

Upon receipt of the budget amendment, County staff must run the following financial reports to ensure adequate funding is available to the subrecipient to make the requested adjustments:

- Budget Adjustment Request Form (Attachment R);
- a budget summary from the subrecipient showing a full accounting for paid and pending expenditures;
- PR-91 ESG Financial Summary Report from the Integrated Data Information System (IDIS); and,
- a Funds Requests report from the County's financial system HDS.

The PS I will review the request and reports to ensure the budget is financially possible, from a fund's availability perspective. Upon determination of such, the PS I will review the modification to ensure it meets thresholds as established by ESG regulations, the County's Citizen Participation Plans, and there no substantive changes in overall performance measures, etc. After completion of review, the PS I will forward the request to the Housing Administrative Manager with a recommendation for approval or denial which will then be escalated to the Chief of Homeless Services for final approval or denial. If the budget adjustment is approved, the PS I will send the Budget Adjustment Approval form (Attachment S) to the subrecipient. The PSI will complete the ESG Allocation Transfer Form (Attachment T) and circulate for approval prior to completing the adjustments. The form along with print out of new budgets will be placed in the project file.

3) Expenditure Timeliness

Subrecipient will be expected to fully obligate or expend ESG funds from a previous funding cycle before spending funds from a current funding cycle. OHS will review Subrecipient's ESG spending. OHS may de-allocate a portion of Subrecipient's ESG funds if Subrecipient cannot ensure that funds will be spent. Subrecipient has 60 days from the end of the fiscal year to request reimbursement for current year contract or risk de-allocation of funds. Subrecipients are expected to submit requests for reimbursements monthly. Only eligible and documented expenses will be reimbursed by the County.

ESG-CV Spending Timeline Requirements

COUNTY will monitor grant spending to ensure that grantees are on track to spend out funds. If grantees are not spending down in a timely manner, funds may be recaptured. All ESG-CV funds (both first and second allocations) must be expended by **September 30, 2022**. ESG-CV spending benchmarks are as follows:

- **September 30, 2021:** At least 20% of total award must be expended
- **March 31, 2022:** At least 80% of total award must be expended
- **September 30, 2022:** All funds must be expended by this date.

PLEASE NOTE: Not meeting any of the above-referenced benchmarks subject the funding

to recapture from the Subrecipient at the discretion of COUNTY and subsequent recapture from COUNTY, at the discretion of HUD.

X. Monitoring

A. Process

OHS will monitor Subrecipient’s program administration once every three years or sooner if the ESG Subrecipient Monitoring Risk Assessment tool (Attachment U), which will be used annually, indicates the subrecipient reflects a greater risk. The annual risk assessment will be conducted within the first quarter of the program year to ensure any required monitoring is conducted within the first half the program year. This will aid the County and Subrecipient with identifying any areas of risk and remediating the before the completion of the program year. The ESG Subrecipient Monitoring Risk Assessment tool will assess the subrecipient’s risk based upon: financial, program, organizational capacity and recordkeeping assessments.

The County will monitor subrecipients to ensure compliance with and applicability to 2 CFR Part 200, including but not limited to:

- Uniform Administrative Requirements;
- Cost Principles; and,
- Audit requirements for Federal awards.

In accordance with 2 CFR 200.331(b), prior to making an award the County will evaluate the subrecipient’s risk of noncompliance with Federal Statutes, regulations and the terms of and conditions of the subaward to determine if the subrecipient will be identified for an award. The risk of noncompliance will also be used to determine the level of monitoring required during the current year for the previous year’s performance period. The risk scoring system is as follows:

Risk Score	Risk Factor	Monitoring Requirement
0-5 points	Low	Yes, with less stringent reviews and frequency
6+ points	High	Yes, with more stringent reviews and greater frequency

The risk assessment score is only one factor that the County will use the risk scores as a preliminary determining factor and will be subject to a follow-up monitoring to ensure deficiencies identified have been remediate and to ensure programmatic and procedural changes have been made to reduce exposure to risk. However, regardless of score, if the subrecipient received findings from the previous monitoring or does not reflect the fiscal and/or organization capacity to perform without heighten risk, no funding or continued fund will be extended. The subrecipient may subject to other remedies as defined below in the **Enforcement subsection of this section**

In accordance with 2 CFR 200.331(f), the County will verify, on an annual basis, that each subrecipient's Federal award expended during the respective fiscal year equaled to exceed the threshold set forth in 2CFR 200.501. In accordance with 2 CFR 200.501 (b), if the entity is a non-Federal entity that expends \$750,000 or more in Federal awards during the non-Federal entity's fiscal year, a single audit must be conducted in accordance with 2 CFR 200.514. The subrecipient must submit a copy of the certified audited financial statement/report or Form 990 tax filings with all applicable schedules and supporting expenditure documentation to the County for review within 60 days of receipt of the written report/filings for the respective fiscal year to determine if the subrecipient's expenditures meet the \$750,000 threshold. The report will be reviewed by County staff and used to help determine if the single audit is required. If the single audit is required, the subrecipient must submit the written single audit report for staff review within 60 days of its completion. The information obtained from the audited financials that will be used as part of the subrecipient's risk assessment and scoring.

Monitoring Preparation

Preparing for the formal on-site monitoring review of a subrecipient entails extensive preparation. The Monitoring will be scheduled and conducted by the ECD Analyst II and the ECD Technician. The monitoring will entail desk audits and onsite monitoring. In the instances of when emergency shelter is being provided via an overnight shelter, onsite physical inspections will also be conducted as part of the annual monitoring process. The following steps are considered part of the preparation for monitoring:

- Review previous year's monitoring results to determine if any previous findings existed, if findings /concerns have been remediated and determine if a clearance letter has been issued.
- Complete risk assessment tool to determine subrecipients scoring and identify level of assessed risk, which will be used to systematically consider whether the results of each subrecipient's audits, on-site reviews, or other monitoring indicate conditions that necessitate adjustments to the recipient's own records.
- Review written agreements to facilitate a complete understanding of the activity(ies) being implemented to determine the monitoring parameters.
- Determine monitoring parameters. Monitoring parameters are those requirements applicable to the subrecipient in the implementation of a particular ESG-funded activity to include but not be limited to:
 - Eligibility of activity, activity costs, client, program delivery costs and staff costs;
 - Certification and verification of homeless status;
 - Processes and Procedures are in adherence to federal rules and regulations (i.e., income limits, Fair Market Rent, Rent Reasonableness, habitability inspections, lead-based paint compliance, etc.);
 - Review of match documentation, timing and eligibility. Examples of documentation reviewed will be: letters of award and/or contracts, general

ledgers or financial tracking showing expenditures of match, use of match and match balances; proof of expenditures such as invoices, account of services provided used as match, etc.

- Review of financial and performance reports:
 - performance goals (established performance outcomes and expenditures);
 - audited financial statements and single audits, if applicable;
 - Review of staffing and organizational capacity;
 - Review of documentation and recordkeeping requirements;
 - Review of case management notes and housing plans to ensure clients' needs are being met;
 - Appropriate use of HMIS and CES systems;
 - Appropriate use of hotel/motel voucher including verifying the lack of available appropriate shelters before issuing vouchers.
- The monitoring parameters should be based on the written agreement, provided it includes sufficient detail to cover the applicable requirements. Monitoring Exhibits (Attachment V) are the monitoring checklists and itemizes documentation that will be reviewed during monitoring. The selection of the appropriate monitoring checklists to be used in the subrecipient monitoring review is part of monitoring preparation. Keep in mind that since the checklists are HUD's checklists, some of the questions may pertain partially or fully to the County. Those questions should be answered and filled in prior to transmitting the checklists to the subrecipient and engaging in the monitoring review. Consider any specific requirements that are part of the activities being monitored.
 - The County will use HUD's monitoring exhibits contained in Chapter 28 – Emergency Solutions Grant (ESG) Program, excerpted from HUD's CPD Monitoring Handbook – 6509.2 REV-7, including but not limited to as its ESG Monitoring Checklists:
 - Exhibit 28-1 – Guide for Review of Homeless and At-Risk Determination/Recordkeeping requirements
 - Exhibit 28-2 – Guide for Review of ESG Recipient's Overall Grant Management
 - Exhibit 28-3 – Guide for Review of ESG Subrecipient Grant Management
 - Exhibit 28-4 – Guide for Review of ESG Street Outreach Requirements
 - Exhibit 28-5 – Guide for Review of ESG Emergency Shelter Requirements
 - Exhibit 28-6 – Guide for Review of ESG Rapid Re-housing and Homelessness

Prevention Requirements

- Exhibit 28-7 – Guide for Review of ESG Match Requirements
- Exhibit 28-8 – Guide for Review of ESG Financial Management and Cost Allowability Requirements
- Exhibit 28-9 – Guide for Review of ESG Procurement Requirements
- Exhibit 28-10 – Guide for Review of ESG Equipment and Equipment Disposition Requirements
- And Chapter 36, excerpted from HUD’s CPD Monitoring Handbook – 6509.2 REV-7, including but not limited to as its ESG-CV Monitoring Checklists:
 - Exhibit 36-4A – Guide for Review of Homeless and At-Risk Determination/Recordkeeping requirements for ESG-CV
 - Exhibit 36-4B – Guide for Review of ESG-CV Recipient’s Overall Grant Management
 - Exhibit 36-4C– Guide for Review of ESG-CV Subrecipient Grant Management
 - Exhibit 36-4D– Guide for Review of ESG-CV Street Outreach Requirements
 - Exhibit 36-4E– Guide for Review of ESG-CV Emergency Shelter Requirements
 - Exhibit 36-4F – Guide for Review of ESG-CV Rapid Re-housing and Homelessness Prevention Requirements
 - Exhibit 36-4G – Guide for Review of ESG-CV Temporary Emergency Shelter Requirements
 - Exhibit 36-4H– Guide for Review of ESG Procurement Requirements
- Assemble file documentation checklists. Some aspects of monitoring checklists may pertain only to the County, in such instances, the checklists will be excluded or parts that do not apply will be marked as “N/A”, any applicable documentation will be reviewed on-site at the subrecipient’s place of business.

Intent to Monitor

After determining the subrecipient activities to be monitored, determining the monitoring parameters and preparing the checklists, Program staff should contact the subrecipient informally to schedule the date(s), times, and location of the monitoring review. Once those details are confirmed, a formal Intent to Monitor Letter should be prepared and transmitted to the chief executive officer of the subrecipient with copies to subrecipient staff identified as part of the team implementing the activity. The selected monitoring checklists should be enclosed with the Intent to Monitor Letter (Attachment W).

For any monitoring activity involving an on-site inspection of client files, the specific files will

be randomly selected from the HMIS report generated by County staff and reviewed on-site during the monitoring.

Entrance Conference

As is customary for HUD monitoring visits, the County should conduct a brief entrance conference with the chief executive officer of the subrecipient and their key staff members to provide an overview of the monitoring visit. Program staff should:

- Explain the scope of the monitoring review;
- Provide an overview of the records to be reviewed;
- Schedule site visits to see emergency shelters (if applicable);
- Confirm the schedules of key subrecipient staff members who can answer questions about project records;
- Confirm schedules for any on-site inspections at project locations;
- Ask the subrecipient to show County monitoring staff the location of copy machine(s), restrooms and the monitoring workspace;
- Provide the subrecipient with an estimated timeframe for the completion of the monitoring review; and
- Tentatively schedule an exit conference with the chief executive of the subrecipient and their key staff members.

Upon the conclusion of the entrance conference, the monitoring review generally commences with the review of selected activities using the HUD checklists provided with the Intent to Monitor Letter.

Conducting the Monitoring Review

Using the HUD checklists as a guide, review project records to determine the answers to each question. Where feasible, copies of source documentation should be referenced on the HUD checklist with a copy attached to the checklist for the County's monitoring file. Any documentation that substantiates a monitoring finding or concern should be copied and attached to the HUD checklist for reference by Program staff when writing the Monitoring Review Letter. As questions come up during the review that are not addressed in the project records provided, Program staff should consult with subrecipient staff to locate additional documentation or to determine that no documentation exists to provide the answer to a particular question.

Most of the questions on the HUD monitoring checklists should be answered based on source documentation from subrecipient files. A subrecipient's compliance with the regulations and the written agreement should be determined principally upon the source documentation available. Where indicated in the HUD monitoring checklists, interviews with subrecipient staff may be required to gain knowledge of their implementation process – particularly where such processes differ from the subrecipient's written policies, the ESG program regulations or the subrecipient agreement governing the activity.

During the review—particularly at the conclusion of each day on-site, it is advisable to spend 15-20 minutes with key subrecipient staff to let them know about any

documentation that appears to be missing or about findings or concerns that have arisen during that day's review. Often, letting those staff members know about those issues during the review will result in the production of additional documentation to clarify and resolve the potential finding or concern. These informal conversations are also good opportunities to provide technical assistance to subrecipient staff on matters that will be findings or concerns. Such conversations should be constructive and facilitate greater understanding of any findings or concerns.

Exit Conference

The exit conference is conducted between the County's monitoring staff and the chief executive officer of the subrecipient as well as key subrecipient staff. The purpose of the exit conference is to summarize the results of the monitoring review and to inform the subrecipient about the findings or concerns they can expect to see in the Monitoring Review Letter. For each finding or concern, Program staff should provide some indication of the required corrective actions that will be included in the Monitoring Review Letter. Providing this information during the exit conference will give the subrecipient an opportunity to get a head start on the resolution of monitoring review findings and concerns. Program staff should also provide an indication of when the Monitoring Review Letter will be sent to the chief executive officer of the subrecipient.

Monitoring Review Letter

The Monitoring Results Letter (Attachment X) will be issued and generally be addressed to the chief executive officer of the subrecipient. The letter should reiterate the particulars of the monitoring review, including the dates of the review, activities reviewed and County monitoring staff who conducted the review.

The Monitoring Results Letter should describe the difference between a finding and concern. A finding is a condition observed during the monitoring review that is not compliant with the applicable regulation. The HUD monitoring checklist questions include the regulatory citation for a particular question. Where there is not a regulatory citation, the question is included to assist the reviewer in understanding the program or activity more fully and to identify issues that, if not properly addressed, could result in substandard performance or result in monitoring findings down the road.

Each finding in the Monitoring Results Letter should include a description of the requirement, regulatory citation and the condition(s) observed that do not comply with the regulations. Each finding should be accompanied by a corresponding required corrective action that will either resolve the finding and/or assist the subrecipient in preventing the finding on future projects. If a finding is irresolvable, such as failing to check the debarment status of a contractor prior to the contract award date, the required corrective action would be to have the subrecipient submit a written commitment to incorporate that requirement into their policies and procedures and to train their staff to adhere to the requirement on future HOME-funded projects.

Each concern identified during the monitoring visit should also be described in the Monitoring Review Letter. The concern should include a description of the condition(s) observed during

the review that could result in substandard performance or result in future monitoring findings. Where appropriate, the County should include recommended corrective actions to the subrecipient to assist the subrecipient in avoiding the concern on future projects.

The Monitoring Results Letter should include a requirement that the subrecipient provide a formal written response to the County within a reasonable timeframe (generally 30 days). A written request for an extension may be submitted. The approval of the extension is at the sole discretion of the County. The extended timeframe will be determined at that time and on a case-by-case basis.

Monitoring Clearance

A Monitoring Clearance Letter (Attachment Y) should be issued to the subrecipient following the receipt of a satisfactory monitoring response. This is the final step in the subrecipient monitoring process.

Enforcement

Just as the subrecipient is monitored and held to the programmatic and regulatory requirements, the County will be subject to monitoring and enforcement conducted by HUD, as prescribed in 24 CFR 576.407(c) and 2 CFR 200.331(h). As such the following will apply:

Performance reviews

(1) HUD will review the performance of each recipient in carrying out its responsibilities under this part whenever determined necessary by HUD, but at least annually. In conducting performance reviews, HUD will rely primarily on information obtained from the records and reports from the recipient and, when appropriate, its subrecipients, as well as information from onsite monitoring, audit reports, and information from IDIS and HMIS. Where applicable, HUD may also consider relevant information pertaining to the recipient's performance gained from other sources, including citizen comments, complaint determinations, and litigation. Reviews to determine compliance with specific requirements of this part will be conducted as necessary, with or without prior notice to the recipient.

(2) If HUD determines preliminarily that the recipient or one of its subrecipients has not complied with an ESG program requirement, HUD will give the recipient notice of this determination and an opportunity to demonstrate, within the time prescribed by HUD and on the basis of substantial facts and data, that the recipient has complied with Emergency Solutions Grant (ESG) requirements. HUD may change the method of payment to require the recipient to obtain HUD's prior approval each time the recipient draws down Emergency Solutions Grant (ESG) funds. To obtain prior approval, the recipient may be required to manually submit its payment requests and supporting documentation to HUD in order to show that the funds to be drawn down will be expended on eligible activities in accordance with all ESG program requirements. If the recipient fails to demonstrate to HUD's satisfaction that the activities were carried out in compliance with ESG program requirements, HUD will take one or more of the remedial actions or sanctions specified in paragraph (b) of this section.

Remedial actions and sanctions

Remedial actions and sanctions for a failure to meet an ESG program requirement will be designed to prevent a continuation of the deficiency; mitigate, to the extent possible, its

adverse effects or consequences; and prevent its recurrence:

- (1) HUD may instruct the recipient to submit and comply with proposals for action to correct, mitigate, and prevent noncompliance with ESG requirements, including:
 - (i) Preparing and following a schedule of actions for carrying out activities affected by the noncompliance, including schedules, timetables, and milestones necessary to implement the affected activities;
 - (ii) Establishing and following a management plan that assigns responsibilities for carrying out the remedial actions;
 - (iii) Canceling or revising activities likely to be affected by the noncompliance, before expending ESG funds for the activities;
 - (iv) Reprogramming ESG funds that have not yet been expended from affected activities to other eligible activities;
 - (v) Suspending disbursement of ESG funds for some or all activities;
 - (vi) Reducing or terminating the remaining grant of a subrecipient and reallocating those funds to other subrecipients; and
 - (vii) Making matching contributions before or as draws are made from the recipient's ESG grant.
- (2) HUD may change the method of payment to a reimbursement basis.
- (3) HUD may suspend payments to the extent HUD deems it necessary to preclude the further expenditure of funds for affected activities.
- (4) HUD may remove the recipient from participation in reallocations of funds under subpart D of this part.
- (5) HUD may deny matching credit for all or part of the cost of the affected activities and require the recipient to make further matching contributions to make up for the contribution determined to be ineligible.
- (6) HUD may require the recipient to reimburse its line of credit in an amount equal to the funds used for the affected activities.
- (7) HUD may reduce or terminate the remaining grant of a recipient and reallocate those funds to other recipients in accordance with subpart D of this part.
- (8) HUD may condition a future grant.
- (9) HUD may take other remedies that are legally available.

Recipient sanctions

In accordance with 24 CFR 576.501(a) and (b), if the recipient determines that a subrecipient is not complying with an ESG program requirement or its subgrant agreement, the recipient must take appropriate actions, as prescribed for HUD in paragraphs (a) and (b) of this section. If the recipient is a State and funds become available as a result of an action under this section, the recipient must reallocate those funds to other subrecipients as soon as practicable. If the recipient is a unit of general purpose local government of territory, it must either reallocate those funds to other sub recipients or reprogram the funds for other activities to be carried

out by the recipient as soon as practicable. The recipient must amend its Consolidated Plan in accordance with its citizenship participation plan if funds become available and are reallocated or reprogrammed under this section, in accordance with 24 CFR 576.501(c). The reallocated or reprogrammed funds must be used by the expenditure deadline in § 576.203.

Retention of Monitoring Records

Program staff must maintain a monitoring review file that includes copies of:

- Intent to Monitor Letter;
- Completed monitoring review checklists;
- Documentation collected during the monitoring review to substantiate answers or observations made on the monitoring review checklists;
- Monitoring Review Letter;
- Subrecipient's Monitoring Review Response; and
- Monitoring Review Clearance Letter.

B. Subrecipients Monitoring of Subrecipients

Subrecipients shall perform onsite monitoring their subrecipients, at least once during and no later than the third quarter of the term of the subrecipient agreement. Subrecipients must maintain and provide access to subrecipient written monitoring procedures and reports as requested by OHS. Any Subrecipients of the County's subrecipients are subject to all federal, state, and local rules, regulations and laws. The monitoring procedures as imposed by the County to the Subrecipients must likewise be imposed upon any subrecipients to the County's Subrecipients.

C. Records Access

Subrecipient shall permit OHS, the federal government, and the duly authorized representatives of such entities access to, and the right to copy, all program client and fiscal records for such purposes as research, data collection, evaluations, monitoring, and auditing. At the sole discretion of OHS, access to records shall include the removing of records from Sub-Recipient's office. Access to records is not limited to the required retention period, but last as long as the records are retained.

Subrecipient must provide citizens, public agencies, and other interested parties with reasonable access to records regarding any uses of ESG funds the Subrecipient received during the preceding five years.

All records confidential in nature must remain in a locked cabinet, in a secure area accessible only to authorized personnel.

D. Other Requirements

Federal Funding Accountability and Transparency Act (FFATA) Reporting Requirements

The County will collect and report data on its use of ESG funds in the Integrated Disbursement and Information System (IDIS) and other reporting systems, as specified by HUD and in compliance with Federal Funding Accountability and Transparency Act of 2006 (FFATA).

The Federal Funding Accountability and Transparency Act (FFATA) was signed on September 26, 2006. The intent is to empower every American with the ability to hold the government accountable for each spending decision. The result is to reduce wasteful spending in the government. The FFATA legislation requires information on federal awards (federal financial assistance and expenditures) be made available to the public via a single, searchable website, which is www.USASpending.gov.

The FFATA Subaward Reporting System (FSRS) is the reporting tool Federal prime awardees (i.e., prime contractors and prime grants recipients) use to capture and report subaward and executive compensation data regarding their first-tier subawards to meet the FFATA reporting requirements. Prime contract awardees will report against sub-contracts awarded and prime grant awardees will report against sub-grants awarded. The sub-award information entered in FSRS will then be displayed on www.USASpending.gov associated with the prime award furthering Federal spending transparency.

Additionally, in accordance with Section F.2.b of CPD Notice 21-08, to ensure transparency in allocations and spending, intended use of funds (ESG and ESG-CF) will be posted on the County's websites (i.e., Community Development and Housing Department website and/or Clerk of the Board website, when actions regarding funding are taken).

REPORTING TIMELINE FOR PRIME CONTRACTORS

Prime Contractors awarded a federal contract or order that is subject to Federal Acquisition Regulation clause 52.204-10 (Reporting Executive Compensation and First-Tier Subcontract Awards) are required to file a FFATA subaward report by the end of the month following the month in which the prime contractor awards any subcontract greater than \$30,000. This reporting requirement will be phased-in (see below):

- **Phase 1:** Reporting subcontracts under federally awarded contracts and orders valued greater than or equal to \$20,000,000, reporting starts now.
- **Phase 2:** Reporting subcontracts under federally awarded contracts and orders valued greater than or equal to \$550,000, reporting starts October 1, 2010.
- **Phase 3:** Reporting subcontracts under federally awarded contracts and orders valued greater than or equal to \$25,000, reporting starts March 1, 2011.
- **Phase 4:** Reporting subcontracts under federally awarded contracts and orders valued greater than or equal to \$30,000, reporting starts October 1, 2015.

Although the requirement to report subawards is being phased-in at certain dollar levels, if you would like to start reporting prior to the start date for your subcontracts, the system is available to you for reporting.

REPORTING TIMELINE FOR PRIME GRANT RECIPIENTS

Prime Grant Recipients awarded a new Federal grant greater than or equal to \$30,000 as of October 1, 2010, are subject to FFATA sub-award reporting requirements as outlined in the Office of Management and Budgets guidance issued August 27, 2010. The prime awardee is required to file a FFATA sub-award report by the end of the month following the month in which the prime recipient awards any sub-grant greater than or equal to \$30,000.

SECTION 3

Section 3 is a provision of the Housing and Urban Development Act of 1968. The purpose of Section 3 is to ensure that employment and other economic opportunities generated by certain HUD financial assistance shall, to the greatest extent feasible, and consistent with existing Federal, State, and local laws and regulations, be directed to low- and very low-income persons, particularly those who are recipients of government assistance for housing, and to business concerns which provide economic opportunities to low- and very low-income persons

The County will make “Best efforts” and “greatest extent feasible” to utilize providers that meet Section 3 and track such compliance, annually, with the application Section 3 reporting.

The County will report all HUD housing and community development financial assistance covered by Section 3 through the applicable program office reporting system on projects for which funds are committed on or after July 1, 2021.

Lobbying Certification and Disclosure

Each person shall file a certification, and a disclosure form, if required, with each submission that initiates agency consideration of such person for:

- (1) Award of a Federal contract, grant, or cooperative agreement exceeding \$100,000; or
- (2) An award of a Federal loan or a commitment providing for the United States to insure or guarantee a loan exceeding \$150,000 or the single family maximum mortgage limit for affected programs, whichever is greater.

Each person shall file a certification, and a disclosure form, if required, upon receipt by such person of:

- (1) A Federal contract, grant, or cooperative agreement exceeding \$100,000; or
- (2) A Federal loan or a commitment providing for the United States to insure or guarantee a loan exceeding \$150,000 or the single family maximum mortgage limit for affected programs, whichever is greater.

Unless such person previously filed a certification, and a disclosure form, if required, under paragraph (a) of this section.

Each person shall file a disclosure form at the end of each calendar quarter in which there occurs any event that requires disclosure or that materially affects the accuracy of the information contained in any disclosure form previously filed by such person under paragraphs (a) or (b) of this section. An event that materially affects the accuracy of the information reported includes:

- (1) A cumulative increase of \$25,000 or more in the amount paid or expected to be paid for influencing or attempting to influence a covered Federal action; or
- (2) A change in the person(s) or individual(s) influencing or attempting to influence a covered Federal action; or,

(3) A change in the officer(s), employee(s), or Member(s) contacted to influence or attempt to influence a covered Federal action.

Any person who requests or receives from a person referred to in paragraphs (a) or (b) of this section:

(1) A subcontract exceeding \$100,000 at any tier under a Federal contract;

(2) A subgrant, contract, or subcontract exceeding \$100,000 at any tier under a Federal grant;

(3) A contract or subcontract exceeding \$100,000 at any tier under a Federal loan exceeding \$150,000; or,

(4) A contract or subcontract exceeding \$100,000 at any tier under a Federal cooperative agreement,

Shall file a certification, and a disclosure form, if required, to the next tier above.

All disclosure forms, but not certifications, shall be forwarded from tier to tier until received by the person referred to in paragraphs (a) or (b) of this section. That person shall forward all disclosure forms to the agency.

Any certification or disclosure form filed under paragraph (e) of this section shall be treated as a material representation of fact upon which all receiving tiers shall rely. All liability arising from an erroneous representation shall be borne solely by the tier filing that representation and shall not be shared by any tier to which the erroneous representation is forwarded. Submitting an erroneous certification or disclosure constitutes a failure to file the required certification or disclosure, respectively. If a person fails to file a required certification or disclosure, the United States may pursue all available remedies, including those authorized by section 1352, title 31, U.S. Code.

For awards and commitments in process prior to December 23, 1989, but not made before that date, certifications shall be required at award or commitment, covering activities occurring between December 23, 1989, and the date of award or commitment. However, for awards and commitments in process prior to the December 23, 1989, effective date of these provisions, but not made before December 23, 1989, disclosure forms shall not be required at time of award or commitment but shall be filed within 30 days.

No reporting is required for an activity paid for with appropriated funds if that activity is allowable under either subpart B or C.

DRUG-FREE WORKPLACE

2 CFR 2429, requires that the award and administration of HUD grants and cooperative agreements comply with Office of Management and Budget (OMB) guidance implementing the portion of the Drug-Free Workplace Act of 1988 (41 U.S.C. 701-707) (referred to as the Act in this part) that applies to grants. This part:

(a) Gives regulatory effect to the OMB guidance (Subparts A through F of 2 CFR part 182) for HUD grants and cooperative agreements; and

(b) Establishes HUD policies and procedures for compliance with the Act that are the same as

those of other Federal agencies, in conformance with the requirement in 41 U.S.C. 705 for governmentwide implementing regulations.

In accordance with the 2 CFR 2429, the County will follow:

(a) The policies and procedures specified in applicable sections of the OMB guidance in Subparts A through F of 2 CFR part 182, as implemented by this part.

(b) Specific sections of OMB guidance that this part supplements. In implementing the OMB guidance in 2 CFR part 182, this part supplements four sections of the guidance, as shown in the following table. For each of those sections, you must follow the policies and procedures of the OMB guidance, as supplemented by this part.

All guidance in the subparts listed below, apply.

Section of OMB guidance	Section in this part where supplemented	What the supplementation clarifies
(1) 2 CFR 182.225(a)	§ 2429.225	Whom in HUD must a recipient other than an individual notify if an employee is convicted for a violation of a criminal drug statute in the workplace?
(2) 2 CFR 182.300(b)	§ 2429.300	Whom in HUD must a recipient who is an individual notify if he or she is convicted of a criminal drug offense resulting from a violation occurring during the conduct of any award activity?
(3) 2 CFR 182.500	§ 2429.500	Who in HUD is authorized to determine that a recipient other than an individual is in violation of the requirements of 2 CFR part 182, as implemented by this part?
(4) 2 CFR 182.505	§ 2429.505	Who in HUD is authorized to determine that a recipient who is an individual is in violation of the requirements of 2 CFR part 182, as implemented by this part?

The regulations below details actions that must be taken in the event the requirements are no longer met by an employee:

182.225 What actions must I take concerning employees who are convicted of drug violations in the workplace?

There are two actions you must take if an employee is convicted of a drug violation in the workplace:

(a) First, you must notify Federal agencies if an employee who is engaged in the performance of an award informs you about a conviction, as required by § 182.205(c)(2), or you otherwise learn of the conviction. Your notification to the Federal agencies must -

- (1) Be in writing;
- (2) Include the employee's position title;
- (3) Include the identification number(s) of each affected award;
- (4) Be sent within ten calendar days after you learn of the conviction; and
- (5) Be sent to every Federal agency on whose award the convicted employee was working. It must be sent to every awarding official or his or her official designee, unless the Federal agency has specified a central point for the receipt of the notices.

(b) Second, within 30 calendar days of learning about an employee's conviction, you must

either -

- (1) Take appropriate personnel action against the employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973 (29 U.S.C. 794), as amended; or
- (2) Require the employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for these purposes by a Federal, State or local health, law enforcement, or another appropriate agency.

§ 2429.225 Whom in HUD does a recipient other than an individual notify about a criminal conviction?

A recipient other than an individual who is required under 2 CFR 182.225(a) to notify Federal agencies about an employee's conviction for a criminal drug offense must notify each HUD office with which it currently has an award.

§ 182.300 What must I do to comply with this part if I am an individual recipient?

As a condition of receiving a federal agency award, if you are an individual recipient, you must agree that -

- (a) You will not engage in the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in conducting any activity related to the award; and
- (b) If you are convicted of a criminal drug offense resulting from a violation occurring during the conduct of any award activity, you will report the conviction:

- (1) In writing.
- (2) Within 10 calendar days of the conviction.
- (3) To the Federal agency awarding official or other designee for each award that you currently have, unless the agency designates a central point for the receipt of the notices, either in the award document or its regulation implementing the guidance in this part. When notice is made to a central point, it must include the identification number(s) of each affected award.

§ 2429.300 Whom in HUD does a recipient who is an individual notify about a criminal conviction?

A recipient who is an individual and is required under 2 CFR 182.300(b) to notify Federal agencies about a conviction for a criminal drug offense must notify each HUD office with which he or she currently has an award.

§ 182.500 How are violations of this part determined for recipients other than individuals?

A recipient other than an individual is in violation of the requirements of this part if the agency head or his or her designee determines, in writing, that -

(a) The recipient has violated the requirements of subpart B of this part; or

(b) The number of convictions of the recipient's employees for violating criminal drug statutes in the workplace is large enough to indicate that the recipient has failed to make a good faith effort to provide a drug-free workplace.

§ 2429.500 Who in HUD determines that a recipient other than an individual violated the requirements of this part?

The Secretary or designee is the official authorized to make the determination under 2 CFR 182.500.

§ 182.505 How are violations of this part determined for recipients who are individuals?

An individual recipient is in violation of the requirements of this part if the agency head or his or her designee determines, in writing, that -

(a) The recipient has violated the requirements of subpart C of this part; or

(b) The recipient is convicted of a criminal drug offense resulting from a violation occurring during the conduct of any award activity.

§ 2429.505 Who in HUD determines that a recipient who is an individual violated the requirements of this part?

The Secretary or designee is the official authorized to make the determination under 2 CFR 182.505.

§ 576.407 Other Federal requirements.

General. The requirements in 24 CFR part 5, subpart A are applicable, including the nondiscrimination and equal opportunity requirements at 24 CFR 5.105(a) and the housing counseling requirements at 24 CFR 5.111. Section 3 of the Housing and Urban Development Act of 1968, 12 U.S.C. 1701u, and implementing regulations at 24 CFR part 75 apply, except that homeless individuals have priority over other Section 3 residents in accordance with § 576.405(c).

Uniform requirements. The requirements of 2 CFR Part 200 apply to the recipient and subrecipients, and:

(1) Program income may be used as matching contributions, subject to the requirements in § 576.201;

(2) The disposition of real property for which ESG funds are used for major rehabilitation, conversion, or other renovation under § 576.102 is governed by the minimum period of use requirements under § 576.102(c).

Environmental review responsibilities.

(1) Activities under this part are subject to environmental review by HUD under 24 CFR part 50. The recipient shall supply all available, relevant information necessary for HUD to perform for each property any environmental review required by 24 CFR part 50. The recipient also shall carry out mitigating measures required by HUD or select alternate eligible property. HUD may eliminate from consideration any application that would require an Environmental Impact Statement (EIS).

(2) The recipient or subrecipient, or any contractor of the recipient or subrecipient, may not acquire, rehabilitate, convert, lease, repair, dispose of, demolish, or construct property for a project under this part, or commit or expend HUD or local funds for eligible activities under this part, until HUD has performed an environmental review under 24 CFR part 50 and the recipient has received HUD approval of the property.

Davis-Bacon Act.

The provisions of the Davis-Bacon Act (40 U.S.C. 276a to 276a-5) do not apply to the ESG program.

Procurement of Recovered Materials

The recipient and its contractors must comply with Section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act. The requirements of Section 6002 include procuring only items designated in guidelines of the Environmental Protection Agency (EPA) at 40 CFR part 247 that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the item exceeds \$10,000 or the value of the quantity acquired by the preceding fiscal year exceeded \$10,000; procuring solid waste management services in a manner that maximizes energy and resource recovery; and establishing an affirmative procurement program for procurement of recovered materials identified in the EPA guidelines.

Displacement, relocation, and acquisition.

Minimizing displacement. Consistent with the other goals and objectives of Emergency Solutions Grant (ESG), the recipient and its subrecipients must assure that they have taken all reasonable steps to minimize the displacement of persons (families, individuals, businesses, nonprofit organizations, and farms) as a result of a project assisted under Emergency Solutions Grant (ESG).

Temporary relocation not permitted. No tenant-occupant of housing (a dwelling unit) that is converted into an emergency shelter may be required to relocate temporarily for a project assisted with ESG funds, or be required to move to another unit in the same building/complex. When a tenant moves for a project assisted with ESG funds under conditions that trigger the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), 42 U.S.C. 4601-4655, as described in paragraph (c) of this section, the tenant should be treated as permanently displaced and offered relocation assistance and payments consistent with that paragraph.

Relocation assistance for displaced persons

In general. A displaced person (defined in paragraph (c)(2) of this section) must be provided

relocation assistance at the levels described in, and in accordance with, the URA and 49 CFR part 24. A displaced person must be advised of his or her rights under the Fair Housing Act (42 U.S.C. 3601 et seq.). Whenever possible, minority persons shall be given reasonable opportunities to relocate to comparable and suitable decent, safe, and sanitary replacement dwellings, not located in an area of minority concentration, that are within their financial means. This policy, however, does not require providing a person a larger payment than is necessary to enable a person to relocate to a comparable replacement dwelling. (See 49 CFR 24.205(c)(2)(ii)(D).) As required by Section 504 of the Rehabilitation Act (29 U.S.C. 794) and 49 CFR part 24, replacement dwellings must also contain the accessibility features needed by displaced persons with disabilities.

Displaced Person

For purposes of paragraph (c) of this section, the term “displaced person” means any person (family, individual, business, nonprofit organization, or farm, including any corporation, partnership, or association) that moves from real property, or moves personal property from real property, permanently, as a direct result of acquisition, rehabilitation, or demolition for a project assisted under the ESG program. This includes any permanent, involuntary move for an assisted project, including any permanent move from the real property that is made:

(A) After the owner (or person in control of the site) issues a notice to move permanently from the property or refuses to renew an expiring lease, if the move occurs on or after:

(I) The date of the submission by the recipient (or subrecipient, as applicable) of an application for assistance to HUD (or the recipient, as applicable) that is later approved and funded if the recipient (or subrecipient, as applicable) has site control as evidenced by a deed, sales contract, or option contract to acquire the property; or

(II) The date on which the recipient (or subrecipient, as applicable) selects the applicable site, if the recipient (or subrecipient, as applicable) does not have site control at the time of the application, provided that the recipient (or subrecipient, as applicable) eventually obtains control over the site;

(B) Before the date described in paragraph (c)(2)(I)(A) of this section, if the recipient or HUD determines that the displacement resulted directly from acquisition, rehabilitation, or demolition for the project; or

(C) By a tenant-occupant of a dwelling unit and the tenant moves after execution of the agreement covering the acquisition, rehabilitation, or demolition of the property for the project.

(ii) Notwithstanding paragraph (c)(2)(I) of this section, a person does not qualify as a displaced person if:

(A) The person has been evicted for cause based upon a serious or repeated violation of the terms and conditions of the lease or occupancy agreement; violation of applicable Federal, State or local law, or other good cause; and the recipient determines that the eviction was not undertaken for the purpose of evading the obligation to provide relocation assistance.

(B) The person moved into the property after the submission of the application but,

before signing a lease and commencing occupancy, was provided written notice of the project, its possible impact on the person (e.g., the person may be displaced), and the fact that the person would not qualify as a “displaced person” (or for any assistance under this section) as a result of the project;

(C) The person is ineligible under 49 CFR 24.2(a)(9)(ii); or

(D) HUD determines that the person was not displaced as a direct result of acquisition, rehabilitation, or demolition for the project.

(iii) The recipient or subrecipient may, at any time, request that HUD to determine whether a displacement is or would be covered by this rule.

(3) Initiation of negotiations. For purposes of determining the type of replacement housing payment assistance to be provided to a displaced person pursuant to this section:

(i) If the displacement is the direct result of privately undertaken rehabilitation, demolition, or acquisition of the real property, “initiation of negotiations” means the execution of the agreement between the recipient and the subrecipient or the agreement between the recipient (or subrecipient, as applicable) and the person owning or controlling the property;

(ii) If site control is only evidenced by an option contract to acquire the property, the “initiation of negotiations” does not become effective until the execution of a written agreement that creates a legally enforceable commitment to proceed with the purchase, such as a sales contract.

(d) Real property acquisition requirements. The acquisition of real property, whether funded privately or publicly, for a project assisted with Emergency Solutions Grant (ESG) funds is subject to the URA and Federal governmentwide regulations at 49 CFR part 24, subpart B.

(e) Appeals. A person who disagrees with the recipient's (or subrecipient's, if applicable) determination concerning whether the person qualifies as a displaced person, or the amount of relocation assistance for which the person may be eligible, may file a written appeal of that determination with the recipient under 49 CFR 24.10. A low-income person who disagrees with the recipient's determination may submit a written request for review of that determination by the appropriate HUD field office.

Emergency Transfer Plan.

Data on emergency transfers requested under §576.409, pertaining to victims of domestic violence, dating violence, sexual assault, or stalking, including data on the outcomes of such requests. The emergency transfer plan must emergency transfer plan is to be developed for:

(i) The state as a whole;

(ii) Each area within the state that is covered by a Continuum of Care; or

(iii) Each subrecipient that administers ESG rental assistance.

(2) Once the applicable plan is developed in accordance with this section, the recipient and each subrecipient that administers ESG rental assistance must implement the plan in accordance with 24 CFR 5.2005(e).

(3) Each emergency transfer plan must meet the requirements in 24 CFR 5.2005(e) and

include the following program requirements:

(i) For families living in units receiving project-based rental assistance (assisted units), the required policies must provide that if a program participant qualifies for an emergency transfer, but a safe unit is not immediately available for an internal emergency transfer, that program participant shall have priority over all other applicants for tenant-based rental assistance, utility assistance, and units for which project-based rental assistance is provided.

(ii) For families receiving tenant-based rental assistance, the required policies must specify what will happen with respect to the non-transferring family member(s), if the family separates in order to effect an emergency transfer.

XI. Acronyms and Definitions

A. Acronym List

Acronyms commonly used are:

OHS	Office of Homeless Services
CES	Coordinated Entry System
CFR	Code of Federal Regulations
COC	Continuum of Care
ESG	Emergency Solutions Grant
FMR	Fair Market Rent
HS	Habitability Standards
HH	Household
HMIS	Homeless Management Information System
HPRP	Homelessness Prevention and Rapid Re-Housing Program HQS Housing Quality Standards
HUD	United States Department of Housing and Urban Development IDIS Integrated Disbursement and Information System

B. Definitions

Domestic Violence: this definition includes domestic violence, dating violence, sexual assault, stalking, attempting to cause, or intentionally, knowingly or recklessly causing or placing another in fear of imminent serious physical injury or emotional, mental or verbal abuse, and using coercive or controlling behavior. This does not include other criminal acts such as violence perpetrated by a stranger, neighbor, acquaintance or friend, unless those persons are family members, intimate partners or household members.

HMIS: means Homeless Management Information System. Domestic Violence Shelters use a comparable database (see “HMIS” section of this manual).

Recipient: the state entity receiving funds directly from HUD through an executed grant agreement for the Emergency Solutions Grant Program also referred to as Office of Homeless Services (OHS).

Shelter: “Emergency shelter,” means any facility whose purpose is to provide temporary shelter for the homeless including congregate shelters, hotels/motels paid for by charitable organizations, or federal, state and/or local government programs, which do not require occupants to sign leases or occupancy agreements.

Subrecipient(s): Subrecipients, also known as service providers, are entities that directly provide ESG client services and receive funding directly from the Recipient.

Support Network: examples include family, friends and faith-based or other social networks.

Temporary Living: residing in a facility for no more than 90 days.

Unaccompanied Youth: unaccompanied youth are less than 25 years of age and homeless under other Federal statutes **and**:

(A) Have not had a lease, ownership interest, or occupancy agreement in permanent

- housing during the 60 days prior to the homeless assistance application;
- (B) Have experienced persistent instability as measured by two moves or more in the preceding 60 days; **and**
 - (C) Can be expected to continue in such status for an extended period due to special needs or barriers.

xii. Attachments

Attachment A	Due Diligence Request
Attachment B	Approval Notification
Attachment C	Draft Subrecipient Agreement
Attachment D	Written Agreement Checklist
Attachment E	Homeless Participation Certification
Attachment F	Homeless Status Certification
Attachment G	Income Calculation Worksheet
Attachment H	Verification of Income Tracking
Attachment I	Program Components and Program Requirements
Attachment J	Eligible Uses, Budget Summary and Accomplishment Goals
Attachment K	Verification of Lack of Shelter Availability
Attachment L	FMR and Rent Reasonableness Certification
Attachment M	Data Quality Report Card
Attachment N	Performance Tracking Tool
Attachment O	Lead Based Paint Requirements for ESG and Forms
Attachment P	Grant Match Report
Attachment Q	Reimbursement Request Checklist
Attachment R	Budget Adjustment Request
Attachment S	Budget Adjustment Approval
Attachment T	ESG Allocation/Set Up Transfer Form
Attachment U	Risk Assessment Tools
Attachment V	ESG Monitoring Checklists
Attachment W	Intent to Monitor Letter
Attachment X	Monitoring Results Letter
Attachment Y	Monitoring Clearance Letter

Appendix 1: Applicable Rules and Regulations

All the following as may be amended from time to time:

1. 24 CFR 5 subpart F: [Occupancy Requirements for Section 8 Project-Based Assistance](#)
2. 24 CFR part 576: [Emergency Solutions Grant Program](#)
3. 24 CFR part 121: [Homeless Management Information System \(HMIS\)](#)
4. 24 CFR part 982: [Fair Market Rent and Rent Reasonableness](#)
5. Lead-Based Paint: <http://www2.epa.gov/lead> and [24 CFR part 35](#)
6. Lead-Based Paint pamphlet: http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_11875.pdf
7. Annual Median Income: [https://www.hudexchange.info/resource/3679/hud-income-limits/HUD Resource Exchange](https://www.hudexchange.info/resource/3679/hud-income-limits/HUD-Resource-Exchange): <https://www.hudexchange.info/esg/>
 - ESG program guidance
 - Federal regulations
 - Tools and technical assistance
 - Listserv opportunities
 - Frequently Asked Questions
8. Personal Responsibility and Work Opportunity Reconciliation Act of 1996:
9. Housing Choice Voucher Guidebook:
10. http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/guidebooks/7420.10G.
11. CFRs cited are amended from time to time and can be found at: <http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&tpl=%2Findex.tpl>
12. OMBs cited are amended from time to time and can be found at: http://www.whitehouse.gov/omb/circulars_default
13. [San Bernardino County Continuum of Care \(COC\) Operations and Governance Manual](#): <http://wp.sbcounty.gov/dbh/sbchp/wp-content/uploads/sites/2/2016/09/CA-609-Governance-Charter.pdf>

Appendix 2: ESG-CV ALLOWABLE EXPENSES

Indirect Costs (24 CFR 576.108)

Allowable Expenses	<p>Up to 10% de minimis rate may be allocated to indirect costs. Or if the agency has a federally approved rate, that will need to be used in place of the de minimis rate and the letter of approval is required to be sent to OHS for review and approval of the federally recognized Indirect Cost Rate Proposal (ICRP).</p> <p>Allowable indirect costs are those costs that benefit the organization. Please see Indirect Cost Toolkit for Continuum of Care and Emergency Solutions Grants Programs for detailed instructions and a list of allowable and prohibited costs.</p>
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HMIS (24CFR §576.107)

Allowable Expenses	<p>The HMIS (24CFR §576.107)grantee or subgrantees may use ESG-CV funds to pay the costs of contributing ESG-CV data to HMIS including the costs of:</p> <ul style="list-style-type: none"> ● Purchasing or leasing computer hardware; ● Purchasing software or software licenses; ● Purchasing or leasing equipment, including telephones, fax machines, and furniture; ● 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 salaries for operating HMIS, including: <ol style="list-style-type: none"> (a) Completing data entry; (b) Monitoring and reviewing data quality; (c) Completing data analysis; (d) Reporting to the HMIS Lead; (e) Training staff on using the HMIS or comparable database; and (f) Implementing and complying with HMIS requirements; Paying costs of staff to travel to and attend training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act; ● Staff travel costs to conduct intake. <p>HMIS costs are eligible beyond typical support of ESG-CV program activities (including HMIS costs not related to ESG-CV program participants) or program participants to the extent that they are necessary to help the geographic area prevent, prepare for, and respond to coronavirus.</p>
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Street Outreach Component ([24CFR §576.101](#))

Allowable Expenses	<ul style="list-style-type: none"> ● <u>Engagement</u>: Activities 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.
	<ul style="list-style-type: none"> ● <u>Case Management</u>: Assessing housing and service needs and ● arranging/coordinating/monitoring the delivery of individualized services.

	<ul style="list-style-type: none"> ● <u>Emergency Health Services</u>: Direct outpatient treatment of medical conditions by licensed medical professionals in community-based settings (e.g. streets, parks, and campgrounds) to those eligible participants for whom other appropriate health services are inaccessible or unavailable within the area.
	<ul style="list-style-type: none"> ● <u>Emergency Mental Health Services</u>: Direct outpatient treatment of mental health conditions by licensed professionals in community-based settings e.g. streets, parks, and campgrounds) to those eligible participants for whom other appropriate health services are inaccessible or unavailable within the area.
	<ul style="list-style-type: none"> ● <u>Transportation</u>: Travel by outreach workers, social workers, medical professionals or other service providers during the provision of eligible street outreach services.
	<ul style="list-style-type: none"> ● <u>Services to Special Populations</u>: Otherwise, eligible Essential Services, as 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.
	<ul style="list-style-type: none"> ● <u>Training on infectious disease prevention and mitigation</u> for staff working directly with those at risk of contracting the coronavirus costs are allowable as a standalone activity – not part of administrative costs
	<ul style="list-style-type: none"> ● <u>Hazard pay</u> for subrecipient staff working in locations with a high likelihood of contracting coronavirus
	<ul style="list-style-type: none"> ● <u>Installation and maintenance</u> of handwashing stations and portable bathrooms for people experiencing unsheltered homelessness ● <u>Volunteer incentives</u>
<p>Emergency Shelter Case Management, Operations, Renovation, and Temporary Emergency Shelter Acquisition and Renovation</p> <p>Emergency Shelter Component (24CFR §576.102) Services delivered to households experiencing homelessness in temporary shelter; shelter rehabilitation and shelter operations.</p>	
Allowable Expenses: Shelter Case Management	<ul style="list-style-type: none"> ● The cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant is eligible. Component services and activities consist of: Using the centralized or coordinated assessment system; ● Conducting the initial evaluation 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; and ● Developing an individualized housing and service plan, including planning a path to permanent housing stability ● Training on infectious disease prevention and mitigation for staff working directly with those at risk of contracting the coronavirus costs are allowable as a standalone

	<p>activity – not part of administrative costs</p> <ul style="list-style-type: none"> ● Hazard pay for subrecipient staff working in locations with a high likelihood of contracting coronavirus ● Volunteer incentives
Allowable Expenses: Shelter Operations	<ul style="list-style-type: none"> ● The costs of maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter
	<ul style="list-style-type: none"> ● Hotel or motel costs are eligible where no appropriate emergency shelter is available, including costs for cleaning and damage repair
	<ul style="list-style-type: none"> ● Installation and maintenance of handwashing stations and portable bathrooms for people experiencing unsheltered homelessness
Allowable Expenses: Shelter Renovation	<ul style="list-style-type: none"> ● Renovation, including major renovation or conversion, of a building to serve as an emergency shelter. The shelter must operate to serve homeless households for at least 3 or 10 years, depending on the type of renovation 24 CFR 576.102
Allowable Expenses: Temporary Emergency Shelter	<ul style="list-style-type: none"> ● Leasing existing real property or temporary structures, acquisition and renovation of real property for temporary emergency shelter for individuals and families experiencing homelessness to prevent, prepare for, and respond to coronavirus. Funds used for acquisition or renovation (including conversion or major rehabilitation) are subject to property's use and disposition requirements in 2 CFR 200.311 Part c, section 1 or 2.
	<ul style="list-style-type: none"> ● Shelter operation costs including the cost of maintenance, rent, security, fuel, equipment, utilities, food, furnishings, supplies necessary for the operation of the temporary shelter;
	<ul style="list-style-type: none"> ● Services, including essential services, housing search and placement services, and housing search and counseling services. 24 CFR 576.102 (a)(1), 24 CFR 576.105 (b)(1), and housing search and counseling services under 24 CFR 578.53(e)(8) and HUD ESG-CV Notice.
Rapid Re-Housing and Prevention Rental Assistance	
Rental Assistance (24CFR §576.106)	
Allowable Expenses	<ul style="list-style-type: none"> ● Monthly rent and any combination of first and last months' rent are allowable costs. Rent may only be paid one month at a time, although rental arrears, prorated rent, and last month's rent may be included with the first month's payment. ● Rent assistance limits are currently waived for all program participants while receiving ESG-CV assistance. <ul style="list-style-type: none"> ● Short-term rental assistance: See Rent assistance. ● Medium-term rental assistance: See Rent assistance. ● Rental arrears and associated late fees for up to six months. Rental arrears may be paid if the payment enables the household to obtain or maintain permanent housing. If funds are used to pay rental arrears, arrears must be included in determining the total period of the household's rental assistance. <p>Total to not exceed 24 months during any 3-year period, including any payment for last month's rent is hereby waived while participant is receiving ESG-CV assistance.</p>

**Rapid Re-Housing and Prevention Case Management
Housing Relocation and Stabilization Services ([24CFR §576.105](#))**

<p>Allowable Expenses</p>	<p>Housing Search and Placement</p> <ul style="list-style-type: none"> ● Assessment of housing barriers, needs and preferences; ● Development of an action plan for locating housing; ● Housing search and outreach to, and negotiation with owner; Assistance with submitting rental applications and understanding leases; Assessment of housing for compliance with ESG requirements for habitability, lead based paint, and rent reasonableness; ● Assistance with obtaining utilities and making moving arrangements; Tenant counseling <p>Housing Stability Case Management</p> <ul style="list-style-type: none"> ● Assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability; ● Using the centralized or coordinated assessment system to conduct the initial evaluation and re-evaluation; ● Legal services; ● Counseling; ● Developing, securing and coordinating services including 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; ● Assistance cannot exceed 30 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 ● Training on infectious disease prevention and mitigation for staff working directly with those at risk of contracting the coronavirus costs are allowable as a standalone activity – not part of administrative costs.
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**Rapid Re-Housing and Prevention Other Financial Assistance
Housing Relocation and Stabilization Services ([24CFR §576.105](#))**

<p>Allowable Expenses</p>	<ul style="list-style-type: none"> ● Rental Application Fees that are charged by the owner to all applicants Security Deposits equal to no more than 1.5 months’ rent.
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	<ul style="list-style-type: none"> ● Moving Costs, such as truck rental, hiring a moving company, or temporary storage fees for a maximum of 3 months after the participant begins to receive services but before they move into permanent housing. Arrearages are not eligible. ● Utility Deposits required by the utility company for all customers (i.e., gas, electric, water/sewage) ● Utility Payments for up to 24 months per household, per service (i.e., gas, electric, water/sewage), including up to 6 months of arrearages, per service. ● Landlord incentives may be paid up to three (3) times the rent charged for the unit: <ul style="list-style-type: none"> (a) Signing bonuses equal to up to 2 months of rent (b) Security deposits equal to up to 1.5 months of rent (c) Paying the cost to repair damages not covered by the security deposit or that are incurred while the program participant is still residing in the unit (d) Paying the costs of extra cleaning maintenance of unit or appliances ● Volunteer Incentives
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ESG-CV ALLOWABLE EXPENSES	
Indirect Costs (24 CFR 576.108)	
Allowable Expenses	<p>Up to 10% de minimis rate may be allocated to indirect costs. Or if the agency has a federally approved rate, that will need to be used in place of the de minimis rate and the letter of approval is required to be sent to OHS for review and approval of the federally recognized Indirect Cost Rate Proposal (ICRP).</p> <p>Allowable indirect costs are those costs that benefit the organization. Please see Indirect Cost Toolkit for Continuum of Care and Emergency Solutions Grants Programs for detailed instructions and a list of allowable and prohibited costs.</p>
HMIS (24CFR §576.107)	
Allowable Expenses	<p>The HMIS (24CFR §576.107)grantee or subgrantees may use ESG-CV funds to pay the costs of contributing ESG-CV data to HMIS including the costs of:</p> <ul style="list-style-type: none"> ● Purchasing or leasing computer hardware; ● Purchasing software or software licenses; ● Purchasing or ● Leasing equipment, including telephones, fax machines, and furniture; ● Obtaining technical support; ● Leasing office space;

	<ul style="list-style-type: none"> ● Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS; Paying salaries for operating HMIS, including: <ul style="list-style-type: none"> (a) Completing data entry; (b) Monitoring and reviewing data quality; (c) Completing data analysis; (d) Reporting to the HMIS Lead; (e) Training staff on using the HMIS or comparable database; and (f) Implementing and complying with HMIS requirements; Paying costs of staff to travel <p style="margin-left: 40px;">to and attend training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act;</p> ● Staff travel costs to conduct intake. <p>HMIS costs are eligible beyond typical support of ESG-CV program activities (including HMIS costs not related to ESG-CV program participants) or program participants to the extent that they are necessary to help the geographic area prevent, prepare for, and respond to coronavirus.</p>
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Street Outreach Component ([24CFR §576.101](#))

Allowable Expenses	<ul style="list-style-type: none"> ● <u>Engagement</u>: Activities 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.
	<ul style="list-style-type: none"> ● <u>Case Management</u>: Assessing housing and service needs and arranging/coordinating/monitoring the delivery of individualized services.
	<ul style="list-style-type: none"> ● <u>Emergency Health Services</u>: Direct outpatient treatment of medical conditions by licensed medical professionals in community-based settings (e.g. streets, parks, and campgrounds) to those eligible participants for whom other appropriate health services are inaccessible or unavailable within the area.
	<ul style="list-style-type: none"> ● <u>Emergency Mental Health Services</u>: Direct outpatient treatment of mental health conditions by licensed professionals in community-based settings e.g. streets, parks, and campgrounds) to those eligible participants for whom other appropriate health services are inaccessible or unavailable within the area.
	<ul style="list-style-type: none"> ● <u>Transportation</u>: Travel by outreach workers, social workers, medical professionals or other service providers during the provision of eligible street outreach services.
	<ul style="list-style-type: none"> ● <u>Services to Special Populations</u>: Otherwise, eligible Essential Services, as 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.
	<ul style="list-style-type: none"> ● <u>Training on infectious disease prevention and mitigation</u> for staff working directly with those at risk of contracting the coronavirus costs are allowable as a standalone activity – not part of administrative costs
	<ul style="list-style-type: none"> ● <u>Hazard pay</u> for subrecipient staff working in locations with a high likelihood of contracting coronavirus

	<ul style="list-style-type: none"> ● <u>Installation and maintenance</u> of handwashing stations and portable bathrooms for people experiencing unsheltered homelessness ● <u>Volunteer incentives</u>
<p>Emergency Shelter Case Management, Operations, Renovation, and Temporary Emergency Shelter Acquisition and Renovation</p> <p>Emergency Shelter Component (24CFR §576.102) Services delivered to households experiencing homelessness in temporary shelter; shelter rehabilitation and shelter operations.</p>	
Allowable Expenses: Shelter Case Management	<ul style="list-style-type: none"> ● The cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant is eligible. Component services and activities consist of: <ul style="list-style-type: none"> ○ Using the centralized or coordinated assessment system; ○ Conducting the initial evaluation 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; and developing an individualized housing and service plan, including planning a path to permanent housing stability training on infectious disease prevention and mitigation for staff working directly with those at risk of contracting the coronavirus costs are allowable as a standalone activity – not part of administrative costs ○ Hazard pay for subrecipient staff working in locations with a high likelihood of contracting coronavirus Volunteer incentives
Allowable Expenses: Shelter Operations	<ul style="list-style-type: none"> ● The costs of maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter
	<ul style="list-style-type: none"> ● Hotel or motel costs are eligible where no appropriate emergency shelter is available, including costs for cleaning and damage repair
	<ul style="list-style-type: none"> ● Installation and maintenance of handwashing stations and portable bathrooms for people experiencing unsheltered homelessness
Allowable Expenses: Shelter Renovation	<ul style="list-style-type: none"> ● Renovation, including major renovation or conversion, of a building to serve as an emergency shelter. The shelter must operate to serve homeless households for at least 3 or 10 years, depending on the type of renovation 24 CFR 576.102
Allowable Expenses: Temporary Emergency Shelter	<ul style="list-style-type: none"> ● Leasing existing real property or temporary structures, acquisition and renovation of real property for temporary emergency shelter for individuals and families experiencing homelessness to prevent, prepare for, and respond to coronavirus. Funds used for acquisition or renovation (including conversion or major rehabilitation) are subject to property’s use and disposition requirements in 2 CFR 200.311 Part C, section 1 or 2.

	<ul style="list-style-type: none"> ● Shelter operation costs including the cost of maintenance, rent, security, fuel, equipment, utilities, food, furnishings, supplies necessary for the operation of the temporary shelter;
	<ul style="list-style-type: none"> ● Services, including essential services, housing search and placement services, and housing search and counseling services. 24 CFR 576.102 (a)(1), 24 CFR 576.105 (b)(1), and housing search and counseling services under 24 CFR 578.53(e)(8) and HUD ESG-CV Notice.
Rapid Re-Housing and Prevention Rental Assistance Rental Assistance (24CFR §576.106)	
Allowable Expenses	<ul style="list-style-type: none"> ● Monthly rent and any combination of first and last months' rent are allowable costs. Rent may only be paid one month at a time, although rental arrears, prorated rent, and last month's rent may be included with the first month's payment. ● Rent assistance limits are currently waived for all program participants while receiving ESG-CV assistance. ● Short-term rental assistance: See Rent assistance. ● Medium-term rental assistance: See Rent assistance. ● Rental arrears and associated late fees for up to six months. Rental arrears may be paid if the payment enables the household to obtain or maintain permanent housing. If funds are used to pay rental arrears, arrears must be included in determining the total period of the household's rental assistance. <p>Total to not exceed 24 months during any 3-year period, including any payment for last month's rent is hereby waived while participant is receiving ESG-CV assistance.</p>
Rapid Re-Housing and Prevention Case Management Housing Relocation and Stabilization Services (24CFR §576.105)	
Allowable Expenses	<p>Housing Search and Placement</p> <ul style="list-style-type: none"> ● Assessment of housing barriers, needs and preferences; ● Development of an action plan for locating housing; ● Housing search and outreach to, and negotiation with owner; Assistance with submitting rental applications and understanding leases; Assessment of housing for compliance with ESG requirements for habitability, lead based paint, and rent reasonableness; ● Assistance with obtaining utilities and making moving arrangements; Tenant counseling <p>Housing Stability Case Management</p> <ul style="list-style-type: none"> ● Assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability; ● Using the centralized or coordinated assessment system to conduct the initial evaluation and re-evaluation; ● Legal services; ● Counseling; ● Developing, securing and coordinating services including 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;

	<ul style="list-style-type: none"> Assistance cannot exceed 30 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 Training on infectious disease prevention and mitigation for staff working directly with those at risk of contracting the coronavirus costs are allowable as a standalone activity – not part of administrative costs.
Rapid Re-Housing and Prevention Other Financial Assistance Housing Relocation and Stabilization Services (24CFR §576.105)	
Allowable Expenses	<ul style="list-style-type: none"> Rental Application Fees that are charged by the owner to all applicants Security Deposits equal to no more than 1.5 months' rent. Moving Costs, such as truck rental, hiring a moving company, or temporary storage fees for a maximum of 3 months after the participant begins to receive services but before they move into permanent housing. Arrearages are not eligible. Utility Deposits required by the utility company for all customers (i.e., gas, electric, water/sewage) Utility Payments for up to 24 months per household, per service (i.e., gas, electric, water/sewage), including up to 6 months of arrearages, per service. Landlord incentives may be paid up to three (3) times the rent charged for the unit: <ul style="list-style-type: none"> (a) Signing bonuses equal to up to 2 months of rent (b) Security deposits equal to up to 1.5 months of rent (c) Paying the cost to repair damages not covered by the security deposit or that are incurred while the program participant is still residing in the unit (d) Paying the costs of extra cleaning maintenance of unit or appliances
	<ul style="list-style-type: none"> Volunteer Incentives

ALLOWABLE EXPENSES	
Indirect Costs (24 CFR 576.108)	
Allowable Expenses	<p>Up to 10% de minimis rate may be allocated to indirect costs. Or if the agency has a federally approved rate, that will need to be used in place of the de minimis rate and the letter of approval is required to be sent to OHS for review and approval of the federally recognized Indirect Cost Rate Proposal (ICRP).</p> <p>Allowable indirect costs are those costs that benefit the organization. Please see Indirect Cost Toolkit for Continuum of Care and Emergency Solutions Grants Programs for detailed instructions and a list of allowable and prohibited costs.</p>
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Allowable Expenses	<p>The HMIS (24CFR §576.107) grantee or subgrantees may use ESG-CV funds to pay the costs of contributing ESG-CV data to HMIS including the costs of:</p> <ul style="list-style-type: none"> Purchasing or leasing computer hardware; Purchasing software or software licenses; Purchasing or leasing equipment, including telephones, fax machines, and furniture; Obtaining technical support;

	<ul style="list-style-type: none"> ● 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 salaries for operating HMIS, including: <ul style="list-style-type: none"> (a) Completing data entry; (b) Monitoring and reviewing data quality; (c) Completing data analysis; (d) Reporting to the HMIS Lead; (e) Training staff on using the HMIS or comparable database; and (f) Implementing and complying with HMIS requirements; Paying costs of staff to travel to and attend training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act; ● Staff travel costs to conduct intake. <p>HMIS costs are eligible beyond typical support of ESG-CV program activities (including HMIS costs not related to ESG-CV program participants) or program participants to the extent that they are necessary to help the geographic area prevent, prepare for, and respond to coronavirus.</p>
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Street Outreach Component ([24CFR §576.101](#))

Allowable Expenses	<ul style="list-style-type: none"> ● <u>Engagement</u>: Activities 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.
	<ul style="list-style-type: none"> ● <u>Case Management</u>: Assessing housing and service needs and ● arranging/coordinating/monitoring the delivery of individualized services.
	<ul style="list-style-type: none"> ● <u>Emergency Health Services</u>: Direct outpatient treatment of medical conditions by licensed medical professionals in community-based settings (e.g. streets, parks, and campgrounds) to those eligible participants for whom other appropriate health services are inaccessible or unavailable within the area.
	<ul style="list-style-type: none"> ● <u>Emergency Mental Health Services</u>: Direct outpatient treatment of mental health conditions by licensed professionals in community-based settings e.g., streets, parks, and campgrounds) to those eligible participants for whom other appropriate health services are inaccessible or unavailable within the area.
	<ul style="list-style-type: none"> ● <u>Transportation</u>: Travel by outreach workers, social workers, medical professionals or other service providers during the provision of eligible street outreach services.
	<ul style="list-style-type: none"> ● <u>Services to Special Populations</u>: Otherwise, eligible Essential Services, as 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.

	<ul style="list-style-type: none"> • <u>Training on infectious disease prevention and mitigation</u> for staff working directly with those at risk of contracting the coronavirus costs are allowable as a standalone activity – not part of administrative costs
	<ul style="list-style-type: none"> • <u>Hazard pay</u> for subrecipient staff working in locations with a high likelihood of contracting coronavirus
	<ul style="list-style-type: none"> • <u>Installation and maintenance</u> of handwashing stations and portable bathrooms for people experiencing unsheltered homelessness • <u>Volunteer incentives</u>
<p>Emergency Shelter Case Management, Operations, Renovation, and Temporary Emergency Shelter Acquisition and Renovation</p> <p>Emergency Shelter Component (24CFR §576.102) Services delivered to households experiencing homelessness in temporary shelter; shelter rehabilitation and shelter operations.</p>	
Allowable Expenses: Shelter Case Management	<ul style="list-style-type: none"> • The cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant is eligible. • Component services and activities consist of: Using the centralized or coordinated assessment system; Conducting the initial evaluation 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; and Developing an individualized housing and service plan, including planning a path to permanent housing stability • Training on infectious disease prevention and mitigation for staff working directly with those at risk of contracting the coronavirus costs are allowable as a standalone activity – not part of administrative costs • Hazard pay for subrecipient staff working in locations with a high likelihood of contracting coronavirus • Volunteer incentives
Allowable Expenses: Shelter Operations	<ul style="list-style-type: none"> • The costs of maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter
	<ul style="list-style-type: none"> • Hotel or motel costs are eligible where no appropriate emergency shelter is available, including costs for cleaning and damage repair
	<ul style="list-style-type: none"> • Installation and maintenance of handwashing stations and portable bathrooms for people experiencing unsheltered homelessness
Allowable Expenses: Shelter Renovation	<ul style="list-style-type: none"> • Renovation, including major renovation or conversion, of a building to serve as an emergency shelter. The shelter must operate to serve homeless households for at least 3 or 10 years, depending on the type of renovation 24 CFR 576.102

Allowable Expenses: Temporary Emergency Shelter	<ul style="list-style-type: none"> Leasing existing real property or temporary structures, acquisition and renovation of real property for temporary emergency shelter for individuals and families experiencing homelessness to prevent, prepare for, and respond to coronavirus. Funds used for acquisition or renovation (including conversion or major rehabilitation) are subject to property’s use and disposition requirements in 2 CFR 200.311 Part C, section 1 or 2.
	<ul style="list-style-type: none"> Shelter operation costs including the cost of maintenance, rent, security, fuel, equipment, utilities, food, furnishings, supplies necessary for the operation of the temporary shelter;
	<ul style="list-style-type: none"> Services, including essential services, housing search and placement services, and housing search and counseling services. 24 CFR 576.102 (a)(1), 24 CFR 576.105 (b)(1), and housing search and counseling services under 24 CFR 578.53(e)(8) and HUD ESG-CV Notice.
Rapid Re-Housing and Prevention Rental Assistance Rental Assistance (24CFR §576.106)	
Allowable Expenses	<ul style="list-style-type: none"> Monthly rent and any combination of first and last months’ rent are allowable costs. Rent may only be paid one month at a time, although rental arrears, prorated rent, and last month’s rent may be included with the first month’s payment. Rent assistance limits are currently waived for all program participants while receiving ESG-CV assistance. Short-term rental assistance: See Rent assistance. Medium-term rental assistance: See Rent assistance. Rental arrears and associated late fees for up to six months. Rental arrears may be paid if the payment enables the household to obtain or maintain permanent housing. If funds are used to pay rental arrears, arrears must be included in determining the total period of the household's rental assistance. <p>Total to not exceed 24 months during any 3-year period, including any payment for last month’s rent is hereby waived while participant is receiving ESG-CV assistance.</p>
Rapid Re-Housing and Prevention Case Management Housing Relocation and Stabilization Services (24CFR §576.105)	
Allowable Expenses	<p>Housing Search and Placement</p> <ul style="list-style-type: none"> Assessment of housing barriers, needs and preferences; Development of an action plan for locating housing; Housing search and outreach to, and negotiation with owner; Assistance with submitting rental applications and understanding leases; Assessment of housing for compliance with ESG requirements for habitability, lead based paint, and rent reasonableness; Assistance with obtaining utilities and making moving arrangements; Tenant counseling <p>Housing Stability Case Management</p> <ul style="list-style-type: none"> Assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability; Using the centralized or coordinated assessment system to conduct the initial evaluation and re-evaluation; Legal services; Counseling; Developing, securing and coordinating services including Federal, state, and local benefits; Monitoring and evaluating program participant progress;

	<ul style="list-style-type: none"> ● Providing information and referrals to other providers; ● Developing an individualized housing and service plan; ● Assistance cannot exceed 30 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 <ul style="list-style-type: none"> ● Training on infectious disease prevention and mitigation for staff working directly with those at risk of contracting the coronavirus costs are allowable as a standalone activity – not part of administrative costs.
<p>Rapid Re-Housing and Prevention Other Financial Assistance Housing Relocation and Stabilization Services (24CFR §576.105)</p>	
<p>Allowable Expenses</p>	<ul style="list-style-type: none"> ● Rental Application Fees that are charged by the owner to all applicants Security Deposits equal to no more than 1.5 months’ rent. ● Moving Costs, such as truck rental, hiring a moving company, or temporary storage fees for a maximum of 3 months after the participant begins to receive services but before they move into permanent housing. Arrearages are not eligible. ● Utility Deposits required by the utility company for all customers (i.e., gas, electric, water/sewage) ● Utility Payments for up to 24 months per household, per service (i.e., gas, electric, water/sewage), including up to 6 months of arrearages, per service. ● Landlord incentives may be paid up to three (3) times the rent charged for the unit: <ul style="list-style-type: none"> (a) Signing bonuses equal to up to 2 months of rent (b) Security deposits equal to up to 1.5 months of rent (c) Paying the cost to repair damages not covered by the security deposit or that are incurred while the program participant is still residing in the unit (d) Paying the costs of extra cleaning maintenance of unit or appliances
	<ul style="list-style-type: none"> ● Volunteer Incentives

Office of Homeless Services
Racial Disparities Policy
for
Emergency Solutions Grant Program

Racial Disparities Policy for the HUD Emergency Solutions Grant (ESG) Program

1. Purpose and Objective

This policy outlines our commitment to addressing racial disparities within the HUD Emergency Solutions Grant (ESG) program. Our goal is to ensure equitable access to services, shelter, and resources for individuals and families experiencing homelessness, with a particular focus on reducing racial disparities in access to and outcomes from ESG-funded activities.

2. Scope

This policy applies to:

- The **grantee** (primary recipient of ESG funds) and all **subgrantees** or **subcontractors** who administer ESG-funded projects, including emergency shelters, street outreach, rapid re-housing, and homelessness prevention activities.
- All activities funded through the **ESG program**, including street outreach, emergency shelter services, homelessness prevention, and rapid re-housing.

3. Addressing Racial Disparities

- **Commitment to Racial Equity:** We are committed to actively addressing and reducing racial disparities within the ESG program by promoting racial equity in service provision, access, and outcomes.
- **Equitable Access:** Ensure all individuals, regardless of race, have equitable access to ESG-funded services, including shelter, case management, and housing assistance.
- **Data and Outcome Tracking:** Implement practices to track and monitor racial disparities in service delivery and program outcomes, including the racial composition of program participants and their service experiences.

4. Key Definitions

- **Racial Disparities:** Systematic differences in treatment, access, and outcomes based on race or ethnicity that may be caused by structural, institutional, or societal factors.
- **Subgrantees:** Organizations or entities that receive ESG funding to carry out specific services (e.g., emergency shelters, street outreach, rapid re-housing).
- **Rapid Re-housing:** A program that provides short-term rental assistance and services to individuals and families experiencing homelessness to help them secure permanent housing.

- **Homelessness Prevention:** Services aimed at preventing individuals or families from becoming homeless, often through rental assistance or case management.
- **HMIS (Homeless Management Information System):** A data management system used to document and track individuals receiving homeless assistance services. It collects data related to client demographics, service history, and housing outcomes.

5. Policy Components

- **Racial Equity in ESG Services:** All ESG-funded services, including outreach, shelter, prevention, and re-housing, must be delivered in a manner that addresses racial disparities. This includes tailoring services to meet the needs of communities that are disproportionately affected by homelessness, particularly communities of color.
- **Capacity Building and Training:** All staff and subgrantees must complete regular training on racial equity, cultural competency, and understanding of systemic racism within the context of homelessness.
- **Data Collection and Reporting:** Subgrantees must collect and report demographic data on race, ethnicity, and outcomes. This data will be used to assess whether racial disparities exist and to ensure equitable service delivery. All data must be entered into the Homeless Management Information System (HMIS) to maintain consistency and ensure proper documentation and reporting.

6. Actions and Requirements for Subgrantees

Subgrantees must adhere to the following guidelines:

- **Racial Equity Implementation:** Subgrantees must integrate racial equity into their program design and service delivery, ensuring that services are culturally appropriate and accessible for all racial and ethnic groups.
- **Data Reporting:** Subgrantees must collect demographic data on race and ethnicity, track the outcomes of participants, and provide reports to the grantee on the racial breakdown of service access, utilization, and outcomes. All data must be documented and maintained in the HMIS system for consistency and compliance with HUD reporting requirements.
- **Community Engagement:** Engage with racial and ethnic minority communities to understand their specific needs and incorporate their input into program design and service delivery.
- **Non-Discrimination:** All ESG-funded services must comply with the principles of non-discrimination and ensure that racial equity is prioritized in all aspects of service delivery, including outreach, intake, case management, and housing assistance.

7. Use of ESG Funds for Racial Equity

ESG funds may be used to support initiatives aimed at reducing racial disparities, including but not limited to:

- **Street Outreach:** Outreach programs targeting communities of color who may be disproportionately affected by homelessness, ensuring that outreach staff are trained in cultural competency and sensitivity to racial and ethnic differences.
- **Emergency Shelter Operations:** Ensuring that emergency shelters are inclusive and culturally competent, providing services that are tailored to the specific needs of racially diverse individuals and families experiencing homelessness.
- **Rapid Re-Housing and Homelessness Prevention:** Implementing services designed to reduce racial disparities in housing placement and retention, including ensuring that racial minorities have access to housing assistance and long-term stability.

8. Monitoring and Evaluation

- **Performance Metrics:** Subgrantees will be required to set racial equity goals and track their progress toward achieving them. This includes monitoring the racial composition of program participants and any disparities in access, service utilization, or outcomes.
- **Annual Reviews:** An annual review will be conducted to assess the effectiveness of racial equity initiatives and determine whether disparities in service access and outcomes exist.
- **Ongoing Improvements:** If disparities are identified, corrective actions will be implemented, including program adjustments, additional training, and resources for subgrantees to improve equity in service delivery.

9. Compliance and Accountability

- **Monitoring Compliance:** The grantee will monitor subgrantees' compliance with this policy through regular performance reviews and reports. Subgrantees will be required to report on racial equity progress annually.
- **Non-Compliance:** Subgrantees who fail to comply with the racial equity standards may face corrective actions, including performance improvement plans or, in severe cases, the termination of funding.
- **Corrective Action Plan:** If racial disparities are identified, subgrantees will work with the grantee to develop a corrective action plan. This plan will outline specific steps to reduce disparities, including adjustments to service delivery, targeted outreach, or training.

10. Training and Education

- **Internal Staff Training:** All staff involved in the ESG program will undergo regular racial equity training, focusing on understanding systemic racism and its impact on homelessness.
- **Subgrantee Education:** Subgrantees will be required to participate in training on racial equity, cultural competency, and best practices for addressing racial disparities within homelessness services.
- **Resource Sharing:** The grantee will provide subgrantees with resources and guidance on how to address racial disparities, including templates for collecting demographic data and tools for evaluating program outcomes.

11. Communication and Reporting

- **Public Commitment:** The grantee will publicly commit to addressing racial disparities in the ESG program, and this policy will be included in public-facing reports, program documentation, and on the program's website.
- **Transparency:** The grantee will ensure transparency in the collection and use of data on racial disparities and will share findings with stakeholders, including subgrantees and the communities served.

12. Conclusion

This policy underscores our commitment to promoting racial equity within the **ESG program**. By integrating racial equity principles into all aspects of service delivery, including outreach, shelter, prevention, and housing assistance, we aim to reduce disparities and ensure that all individuals, regardless of race, have access to the resources and services they need to overcome homelessness.

Continuum of Care 2022-23 Outcomes by Race and Ethnicity

Applicant Name:	San Bernardino County		CoC Name, if different:								
Using data from your HMIS, please insert outcomes here (using the period from October 1, 2022- September 30, 2023):											
	Experiencing Homelessness		Accessing Emergency Shelters		Exiting to Permanent Housing		Length of Time Homeless		Accessing Permanent Supportive Housing		
	#	%	#	%	#	%	#	%	#	%	
Total	4336	100%	2624	100%	2927	100%	134	100%	1497	100%	
White	1129	26%	1948	74%	769	26%	144	107%	318	21%	
Black	73	2%	1205	46%	1116	38%	137	102%	558	37%	
Native American/Alaskan	52	1%	38	1%	34	1%	136	101%	7	0%	
Asian/Pacific Islander	33	1%	25	1%	23	1%	128	96%	5	0%	
Other/Multi-Racial	81	2%	98	4%	54	2%	96	72%	28	2%	
Ethnicity						0%		0%		0%	
Hispanic	1454	34%	94	4%	985	34%	121	90%	370	25%	
Non-Hispanic	2882	66%		0%	1942	66%	141	105%	1127	75%	

**Environmental Review
for Activity/Project that is Exempt or
Categorically Excluded Not Subject to Section 58.5
Pursuant to 24 CFR 58.34(a) and 58.35(b)**

Project Information

Project Name: ESG-2024-State

HEROS Number: 900000010456812

Start Date: 10/01/2025

Responsible Entity (RE): SAN BERNARDINO COUNTY, Office of Homeless Services - San Bernardino CA,
92415

State / Local Identifier:

RE Preparer: Monica Lopez

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable):

Point of Contact:

40 CFR 1506.5(b)(4): The lead agency or, where appropriate, a cooperating agency shall prepare a disclosure statement for the contractor's execution specifying that the contractor has no financial or other interest in the outcome of the action. Such statement need not include privileged or confidential trade secrets or other confidential business information.

- ✓ By checking this box, I attest that as a preparer, I have no financial or other interest in the outcome of the undertaking assessed in this environmental review.

Project Location: 560 E Hospitality Ln Ste 200, San Bernardino, CA 92408

Additional Location Information:

560 East Hospitality Lane Suite 200 San Bernardino, CA 92408

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

County Office of Homeless Services staff costs for the implementation of the State ESG projects for fiscal year 2024-2027. This includes implementation of services such as providing Emergency Shelter, Rapid Re-Housing, Street Outreach, Homeless Prevention and HMIS.

[560 E Hospitality Ln - Google Maps.pdf](#)

Level of Environmental Review Determination
Activity / Project is Exempt per 24 CFR 58.34(a):
 58.34(a)(4)

Signature Page

Funding Information

Grant / Project Identification Number	HUD Program	Program Name	Funding Amount
24-State ESG	Community Planning and Development (CPD)	Emergency Solutions Grants (ESG) Program	\$434,384

Estimated Total HUD Funded, Assisted or Insured Amount: \$434,384

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$434,384

Compliance with 24 CFR §50.4 & §58.6 Laws and Authorities

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4 & §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Runway Clear Zones and Clear Zones 24 CFR part 51	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance with Airport Runway Clear Zone. As shown on the map, the project is well outside of the 15,000 linear foot distance from a military airport and

<p>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4 & §58.6</p>	<p>Are formal compliance steps or mitigation required?</p>	<p>Compliance determination (See Appendix A for source determinations)</p>
<p>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6</p>		
		<p>outside the approximately 2,500-foot distance from a and civilian airport. The site is 3.02 miles from the nearest airport.</p>
<p>Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act. The southwestern most edge of San Bernardino County is over 20 miles from the nearest coastline. No Coastal Barrier Resources will be affected by this project as it is located in San Bernardino County.</p>
<p>Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with Flood Insurance requirements. Flood Map #: 06071C8684J, dated: September 2, 2016.</p>

Mitigation Measures and Conditions [CFR 40 1505.2(c)]: Summarized below are all mitigation measures adopted by the Responsible Entity to reduce, avoid or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Mitigation Plan	Complete
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Project Mitigation Plan

Supporting documentation on completed measures

APPENDIX A: Related Federal Laws and Authorities

Airport Runway Clear Zones

General policy	Legislation	Regulation
It is HUD’s policy to apply standards to prevent incompatible development around civil airports and military airfields.		24 CFR Part 51 Subpart D

1. Does the project involve the sale or acquisition of developed property?

✓ No

Based on the response, the review is in compliance with this section.

Yes

Compliance Determination

Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance with Airport Runway Clear Zone. As shown on the map, the project is well outside of the 15,000 linear foot distance from a military airport and outside the approximately 2,500-foot distance from a and civilian airport. The site is 3.02 miles from the nearest airport.

Supporting documentation

[OHS to Airport \(1\).png](#)

Are formal compliance steps or mitigation required?

✓ Yes
No

Coastal Barrier Resources

General requirements	Legislation	Regulation
HUD financial assistance may not be used for most activities in units of the Coastal Barrier Resources System (CBRS). See 16 USC 3504 for limitations on federal expenditures affecting the CBRS.	Coastal Barrier Resources Act (CBRA) of 1982, as amended by the Coastal Barrier Improvement Act of 1990 (16 USC 3501)	

This project is located in a state that does not contain CBRA units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

Screen Summary

Compliance Determination

This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act. The southwestern most edge of San Bernardino County is over 20 miles from the nearest coastline. No Coastal Barrier Resources will be affected by this project as it is located in San Bernardino County.

Supporting documentation

- [OHS Coastal Barrier Resources.pdf](#)
- [San Bernardino County No Coastal.pdf](#)

Are formal compliance steps or mitigation required?

✓ Yes
No

Flood Insurance

General requirements	Legislation	Regulation
Certain types of federal financial assistance may not be used in floodplains unless the community participates in National Flood Insurance Program and flood insurance is both obtained and maintained.	Flood Disaster Protection Act of 1973 as amended (42 USC 4001-4128)	24 CFR 50.4(b)(1) and 24 CFR 58.6(a) and (b); 24 CFR 55.1(b).

1. Does this project involve financial assistance for construction, rehabilitation, or acquisition of a mobile home, building, or insurable personal property?

✓ No. This project does not require flood insurance or is excepted from flood insurance.

Based on the response, the review is in compliance with this section.

Yes

4. While flood insurance is not mandatory for this project, HUD strongly recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). Will flood insurance be required as a mitigation measure or condition?

Yes

✓ No

Screen Summary

Compliance Determination

Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with Flood Insurance requirements. Flood Map #: 06071C8684J, dated: September 2, 2016.

Supporting documentation

[FIRMETTE_OHS.pdf](#)

Are formal compliance steps or mitigation required?

- Yes
- ✓ No