



EMERGENCY SOLUTIONS GRANT

ESG DESK GUIDE 2018



North Carolina Department of Health and Human Services
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ESG Acronyms	
AH	Affordable Housing
AHAR	Annual Homeless Assessment Report
AMI	Area (Annual) Median Income
APR	Annual Performance Report
CE	Coordinated Entry
CH	Chronic Homeless
CoC	Continuum of Care
DAAS	Division of Aging and Adult Services
DHHS	Department of Health and Human Services
DV	Domestic Violence
ES	Emergency Shelter
ESG	Emergency Solutions Grants
eSNAPS	Electronic data system for SNAP (see SNAP)
FMR	Fair Market Rent
HEARTH	Homeless Emergency and Rapid Transition to Housing
HIC	Housing Inventory Chart
HMIS	Homeless Management Information Systems
HP	Homeless Prevention
HSP	Homeless Service Provider
HUD	U.S. Dept. of Housing and Urban Development
LPA	Local Planning Area
PATH	Projects for Assistance in Transition from Homelessness
PIT	Point In Time
PSH	Permanent Supportive Housing
RHY	Runaway & Homeless Youth
RRH	Rapid Re-Housing
SH	Safe Haven
SHP	Supportive Housing Program (includes TH, S+C, SPC and SRO)
SOAR	SSI/SSDI Outreach, Access, and Recovery Program
SRO	Single Room Occupancy
SSDI	Social Security Disability Income
SSO	Supportive Services Only
SSVF	Supportive Services for Veteran Families Program
SNAP	Special Needs Assistance Programs
TA	Technical Assistance
TANF	Temporary Assistance to Needy Families
TBRA	Tenant Based Rental Assistance
UDE	Universal Data Elements
USICH	U.S. Interagency Council on Homelessness
VASH	HUD-VA Supportive Housing Program
VAWA	Violence Against Women Act
VI-SPDAT	Vulnerability Index Service Prioritization Decision Assistance Tool
VSP	Victim Service Provider

SECTION 1: PROGRAM OVERVIEW AND OBJECTIVES

Background Information

This ESG Desk Guide is provided by the North Carolina Department of Health and Human Services Division of Aging and Adult Services (NC DHHS DAAS), for the purpose of informing ESG recipients on grant management and administration activities required by the ESG program.

Included in this guide are the procedures and process each grant recipient must follow in order to be in compliance with the federal, state and local ESG standards and regulations. The NC DHHS DAAS encourages each grant recipient to share this guide with their employees and members of the organization involved in administering or overseeing the ESG funded programs.

On an average night, roughly 9,000 people in North Carolina are experiencing homelessness. This includes more than 500 families with children. The programs NC DHHS DAAS funds through the ESG program provide critical services to families and individuals experiencing homelessness or at risk of becoming homeless.

These programs and services are carried out by community organizations that apply for, and are awarded, ESG funds on an annual basis. These funds are a formula grant appropriated by Congress to the United States Department of Housing and Urban Development with the intention to: (1) engage homeless individuals and families living on the street; (2) improve the number and quality of emergency shelters for homeless individuals and families; (3) help operate these shelters; (4) provide essential services to shelter residents, (5) rapidly re-house homeless individuals and families, and (6) prevent families and individuals from becoming homeless. ESG funds are intended to be used as part of a crisis response system using a low barrier, housing-focused approach to ensure that homelessness is rare, brief, and non-recurring.

The ESG program is further broken down into two primary functions: (1) Emergency Response Activities, including emergency shelter operations and services as well as street outreach; (2) Housing Stability Activities including homelessness prevention and rapid re-housing. ESG funds can also be used for Homeless Management Information System (HMIS) participation and administration/DV comparable database participation and administration.

On May 20, 2009, the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009 was passed into law, which amended and reauthorized the McKinney-Vento Homeless Assistance Act. The Emergency Solutions Grant (ESG) program is one of the primary McKinney-Vento Act programs affected by the HEARTH Act. HUD released interim regulations for ESG in December 2011.

The primary changes included:

- A change of name to Emergency Solutions Grant (formerly Emergency Shelter Grant)
- Greater focus on program performance
- Expansion of the definition of homelessness and chronic homelessness
- Increased emphasis on prevention/rapid re-housing

The ESG program is a reimbursable grant program established by the McKinney-Vento Homeless Assistance Act (Public Law 100-77, Public Law 100-628) as amended by the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act). The HEARTH Act authorized the Emergency Solutions Grant (ESG) Program for providing assistance to persons and families who are homeless or at risk of homelessness.

The ESG program is designed as the first step in the continuum of assistance to prevent homelessness and to enable the homeless population to move steadily toward independent living. The North Carolina Department of Health and Human Services (DHHS), Division of Aging and Adult Services (DAAS) is responsible for administering North Carolina's Statewide annual allocation of funds Allocation of from the Department of Housing and Urban Development (HUD). Emergency Solutions Grant (ESG) Program funds granted to the State of North Carolina, herein referred to NC ESG.

ESG Program Contacts

Below are the NC ESG contacts for funded agencies. Please direct all questions, concerns, updates, and submission of documents to the ESG Homeless Programs Coordinator, with the exception of Requisition Requests. Requisition Requests shall be submitted electronically to the NC ESG email (ncesg@dhhs.nc.gov).

<p>Kim Crawford ESG Homeless Programs Coordinator Division of Aging and Adult Services North Carolina Department of Health and Human Services</p> <p>919-855-4991 office 919-733-5993 fax Kim.Crawford@dhhs.nc.gov</p> <p>2101 Mail Service Center Raleigh, NC 27699-2101</p>	<p>Chris Battle ESG Homeless Programs Coordinator Division of Aging and Adult Services North Carolina Department of Health and Human Services</p> <p>919-855-4984 office 919-733-5993 fax Chris.battle@dhhs.nc.gov</p> <p>2101 Mail Service Center Raleigh, NC 27699-2101</p>
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All information, updates, news and forms pertaining to NC ESG's program can be found on the following website: <https://www.ncdhhs.gov/nc-emergency-solutions-grant>

ESG 2018 Timeline

The following timeline lists the key dates for the 2018 grant year, which are also detailed in the grant agreement. Subrecipients are responsible for knowing these dates as well as communicating them to all applicable staff.

Grant Year Begins:	January 01, 2018
Quarter 1 (Q1):	January 01, 2018 – March 31, 2018
Quarter 1 Reports Deadline:	June 30, 2018
Quarter 2 (Q2):	April 01, 2018 – June 30, 2018
Quarter 2 Reports Deadline:	July 31, 2018
Quarter 3 (Q3):	July 01, 2018 – Sept. 30, 2018
Quarter 3 Reports Deadline:	October 31, 2018
Quarter 4 (Q4):	October 1, 2018 – Dec. 31, 2018
Last Day to Expend Funds:	December 31, 2018
Quarter 4 Report Deadline:	January 31, 2019
Final Payment Request Deadline:	February 15, 2019
2018 CAPER submission by ESG Subrecipients	February 15, 2019
2018 ESG Office CAPER Submission Deadline:	March 31, 2019

SECTION 2 GENERAL REQUIREMENTS & AUTHORITY

The North Carolina ESG Program (NC ESG) is administered under the provisions of the HUD regulations at 24 CFR Part 576, as well as the agency's executed grant agreement, and the 2018 ESG Desk Guide. Subrecipients should review all HUD ESG program requirements. Additional resources and links for the Subrecipients to ESG laws, regulations, tools and notices can be found at: <https://www.hudexchange.info/programs/esg/>

NC ESG has flexibility in certain areas of administering the ESG Program and may establish more detailed requirements than those required by HUD. All Subrecipients are expected to use ESG funds in accordance with the grant regulations contained in 24 CFR Parts 91 and 576 and in compliance with OMB Circular A-200.500 24 CFR 200. Where there are differences, Subrecipients should comply with NC ESG's requirements according its grant agreement and ESG Desk Guide.

Coordinated Entry Assessment

HUD requires that all Local Planning Areas have a Coordinated Assessment system that all projects and agencies, who serve homeless persons, utilize. This is to be utilized by all types of programs that would include: Safe Havens, Day Shelters, Emergency Shelters, Transitional Housing, Rapid Rehousing, ESG Homeless Prevention, Permanent Supportive Housing and Shelter Plus Care Programs Legacy projects.

Coordination with Other Targeted Homeless Services

Subrecipients should coordinate and integrate ESG activities with mainstream housing, health, social services, employment, education, and youth programs, as well as programs targeted to homeless people in its service area to provide a strategic, community-wide system to prevent and end homelessness. refer to the ESG regulations 24 CFR 576.400(b)(c), for a full list of these programs.

Data Collection

Grantees will use the statewide Homeless Management Information System (HMIS), currently NC HMIS on Mediware/ServicePoint, to ensure that all data needed for program evaluation and required reports is available to integrate into the statewide HMIS system in a timely manner. Failure to do so may result in suspension of funding or payback of ESG funds. Agencies that are exempt from the HMIS participation requirement (i.e. Domestic Violence / Victim Service Provider agencies) must meet the same reporting requirements using a comparable HMIS that produces electronic reports including, but limited to, the Consolidated Annual Performance Evaluation Report, as well as other data request for all State and Federal reporting and evaluations.

HMIS Comparable Database- An information management system that contains the same client and program data elements that are contained in the statewide HMIS. Federal law requires that Domestic Violence / Victim Service Provider agencies use Systems Comparable to HMIS rather than the HMIS used by other homeless agencies. **Please note that all Domestic Violence / Victim Service Provider providers funded by the FY 2018-18 NC ESG Program must have a comparable database, that collects all HUD mandated Universal Data Elements (UDE) and produces electronic reports including but not limited to the Consolidated Annual Performance Report (CAPER).**

Environmental Reviews

Per 24 CFR 576.407(d), HUD-assisted projects, including ESG Subrecipients and sub-Subrecipients, are required to comply with the National Environmental Policy Act (NEPA) by conducting an environmental review to determine the potential environmental impacts of a project or, if applicable, by documenting its categorical exclusion or exemption from this requirement.

Subrecipients using funds for project-based rental assistance are subject to a limited scope review. Subrecipients using ESG funds for essential services, shelter operations, HMIS, or tenant-based rental assistance only are considered exempt or categorically excluded.

The level of environmental review increases for Subrecipients using ESG funds to lease office space to categorically excluded subject to Section 58.5. Subrecipients are required to document its compliance with environmental review as instructed by NC ESG.

Funding Priorities

- **Emergency Response**

The NC ESG Program requires subrecipients support the Housing First model that prioritizes rapid placement and stabilization in permanent housing that does not have service participation requirements or preconditions (such as sobriety or a minimum income threshold).

The State strongly encourages use of emergency shelter funds to support facilities linked to rapid rehousing programs within a CoC / Local Planning Areas.

Applicants that request Emergency Response funds may allocate all dollars for Emergency Shelter Operations or allocate no less than 60% of the funding for Shelter Operations and no more than 40% for Shelter Services.

- **Housing Stabilization**

For the purpose of this grant the NC ESG priority for Housing Stabilization funds is rapid rehousing and HMIS activities. Rapid Rehousing Services and Rapid Rehousing Financial Assistance should be linked an emergency shelter or street outreach program to ensure coordination/prioritization of clients in obtaining and maintaining permanent housing.

Applicants that request Rapid Rehousing funds may allocate all stabilization dollars for Rapid Rehousing Financial Assistance or allocate no less than 60% of the funding for financial assistance and no more than 40% for services.

Homeless Participation (576.405)

Subrecipients must involve homeless or formerly homeless persons on the board of directors or other policy/decision making body regarding ESG assistance Recipients unable to meet this requirement, must develop and implement a plan to consult with homeless or formerly homeless persons in considering and making policies regarding ESG assistance.

Local Planning Area (LPA) Lead Agency

The agency selected by the LPA and designated to carry out the activities of the LPA or grant including fiscal and compliance activities. Regular administrative tasks may include, but are not limited to: management of the annual HUD application, coordination of other funding opportunities, project and system monitoring, reporting, meeting management, etc. For non-Balance of State LPAs, the LPA Lead Agency should be the CoC Collaborative Applicant. The LPA Lead Agency is the organization responsible for applying, on behalf of the community, for NC ESG funds.

Matching Funds

Match funds not applicable for 2018 program year.

Per 24 CFR 576.201, Subrecipients must match their total ESG grant award consisting of documented non-McKinney resources. Matching funds must be used in accordance with all requirements that apply to ESG funds (e.g., documentation, participant eligibility, eligible costs). Match may include cash and/or non-cash contributions, including the value of any lease on a building, the actual value of professional services, any salary paid to staff to carry out the program, and the value of the time and services contributed by volunteers to carry out the program.

Any cash or non-cash contribution matched to ESG grant cannot have been used and will not be used to match any other Federal program's funds nor any other grant. Failure to provide properly documented uses and sources of match at the end of the grant term will require repayment of all unmatched reimbursements.

ESG Policies and Procedures Manual (Operations Manual)

Subrecipients are required to maintain an operation manual that details program and contract expectations for staff and volunteers. **Note: this operations manual is not the organization's personnel manual or employee handbook, these operations are program specific,** although there is a possibility of overlap. The operations manual should include program specific rules and contract expectations as outlined in this manual and the following below:

- Program Rules, including program design, type of assistance, assistance time limit, eligibility, population served and termination of assistance grievance policy.
- Program Intake form(s) with all HUD Universal Data Elements and basic demographic information collected.
- Fair Housing Policy must include NC Fair Housing Act Standards language.
- Anti-discriminatory policy must ensure equal employment opportunity without discrimination or harassment on the basis of race, color, religion, sex, sexual orientation, gender identity or expression, age, disability, marital status, citizenship, genetic information, or any other characteristic protected. Flyers or posters do not constitute an operations policy.
- Appeals, grievance, termination policies clearly defined with who, how and when the appeal must be filed.

- Housing First commitment to end homelessness and is the most effective approach to ending chronic homelessness. Housing First offers individuals and families experiencing homelessness immediate access to permanent affordable or supportive housing. This model of housing assistance prioritizes rapid placement and stabilization in permanent housing that does not have service participation requirements or preconditions (such as sobriety or a minimum income threshold).
- Low-Barrier policies where a minimum number of expectations are placed on people who wish to live there.
- Habitability Standards. Subrecipients are required to conduct a habitability standards inspection on any unit that a participant will be receiving ANY ESG financial assistance such as any rental assistance, security deposit, last month's deposit, utility deposit, moving costs. Subrecipients must certify that the unit has passed habitability standards before any ESG funds may be released. In addition, an annual habitability standards inspection must be conducted for any unit in which ESG funds are being used.
- Confidentiality. The subrecipient must have written procedures to ensure all records containing personally identifying information (as defined in HUD's standards for participation, data collection, and reporting in a local HMIS) of any individual or family who applies for and/or receives ESG assistance will be kept secure and confidential.
- Terminating Assistance. Per 24 CFR 576.402, if a program participant violates program requirements, their ESG benefits may be terminated in accordance with a formal process established by the sub-Subrecipient that recognizes the rights of the individuals affected and allows for due process. The Subrecipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a participant's assistance is terminated only in the most severe cases. Termination does not bar the sub- Subrecipient from providing further assistance at a later date to the same family or individual. To terminate rental assistance or housing relocation and stabilization services, the Subrecipient's formal process must include at minimum:
 - Written notice to the program participant containing a clear statement of the reason(s) for termination;
 - A review of the decision, in which the participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
 - Prompt written notice of the final decision to the participant.

Written Standards

The U.S. Department of Housing and Urban Development requires subrecipients to develop and implement Written Standards for programs provided through the Emergency Solutions Grant Program. The following guidelines must be followed when developing these Standards. Standards for emergency shelter programs will be different than Standards for homeless prevention and rapid re-housing programs so agencies must ensure that the Standards developed are appropriate for programs offered. Enter a check-mark next to applicable areas as the Standards are completed to ensure all aspects of the requirements are met.

ALL PROGRAMS
1. Standards include the area of service where assistance shall be offered.
2. Standards include all type(s) of assistance that will be offered through the ESG program.
3. Standards summarize the procedure in place that defines how program participants will be evaluated for eligibility of assistance under the ESG program. (Note: DV shelters must follow the requirements of the Violence Against Women Act and the Family Violence Prevention and Services Act which prohibits agencies from making its shelter or housing conditional on the participant's acceptance of service)
4. Standards include procedures describing the coordination (coordinated entry) emergency shelter providers, essential services providers, homelessness prevention, and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers.
5. Standards include a list of available programs that program participants will be referred, including all programs reflected in 576.400 (b) and (c) such as Shelter + Care, VASH Voucher, Section 8, Emergency Food and Shelter program, etc. if available to program participants in the agency's area of service.
6. Standards describe the formal termination process established by the agency that recognizes the rights of individuals affected. The agency must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases.
7. Standards describe the program participant's formal grievance process. Included shall be the right for the participant to contact the agency's Director, the Housing Division or HUD.
8. Standards include summaries regarding the requirement that clients served and activities provided with ESG funds will be entered into HMIS (or comparable database if a DV shelter), the timeframe for data to be entered, and the process for ensuring confidentiality of client records.
9. Standards include steps used to ensure clients receiving ESG assistance are provided all applicable HMIS releases, forms, client complaint process, etc. as required by HMIS regulations.

STREET OUTREACH/ EMERGENCY SHELTER-OPERATIONS/EMERGENCY SHELTER-ESSENTIAL SERVICES

1. Standards include a summary of how agency staff will target and provide services related to street outreach.
2. Standards include steps for admission, diversion, referral, and discharge by emergency shelters assisted under ESG, including standards regarding length of stay limits, if any, and safeguards to meet the safety and shelter needs of special populations, such as victims of Domestic Violence / Victim Service Provider, sexual assault, etc.
3. Standards include steps for admission, diversion, referral and discharge by emergency shelters assisted under ESG for individuals and families who have the highest barriers to housing and are likely to be homeless the longest.
4. Standards include assessing, prioritizing, and reassessing individuals and families' needs for essential services related to emergency shelter.

HOMELESS PREVENTION AND RAPID RE-HOUSING

1. Standards shall include definitions of who is considered to be homeless and at-risk of homelessness, as defined in 576.2.
2. Standards include a process for determining and prioritizing which eligible families and individuals will receive homeless prevention or rapid re-housing assistance.
3. Standards include standards for determining what percentage or amount of rent and utilities costs each program participant must pay while receiving homelessness prevention or rapid re-housing assistance.
4. Standards include process for evaluating and documenting income eligibility since program participant's income must be **below 30% of area median income** as established by HUD for the area in which the participant lives when entering the program. Agencies must follow guidelines found under 24 CFR 5.609 when calculating income.
5. Standards include the steps to determine the eligibility of rental assistance, including steps to determine that rent + utilities do not exceed Fair Market Rents for the area of service.
6. Standards include how agency staff will document FMR and rent reasonableness standards, lead based paint inspections, and housing inspections. Included shall be procedures to verify and document the age of the units built before 1978 may contain lead-based paint.
7. Standards include steps for determining how long a program participants will be provided rental assistance and whether or not (and how) the amount of that assistance will be adjusted over time, if applicable.
8. Standards include steps for determining the type, amount, and duration of housing stabilization and/or relocation services to provide to a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, the maximum number of months the program participant receives assistance, or the maximum number of times the program participant may receive assistance.

9. Standards that includes the requirements of program participants to meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability (and be documented in client case file and HMIS). Included shall be the agency's plan to assist the program participant to retain permanent housing after the ESG assistance ends, taking into account all relevant considerations such as the program participant's current or expected income and expenses, other public or private assistance for with the program participant will be eligible and likely to receive, and the relative affordability of available housing in the area. (Note DV shelters must follow the requirements of the Violence Against Women Act or the Family Violence Prevention and Services Act which prohibits agencies from making its shelter or housing conditional on the participants acceptance of service.)

10. Standards include requirements that clients will be re-evaluated for program eligibility and the types and amounts of assistance the program participant needs. This re-evaluation process shall be conducted not less than once every 3 months for program participants receiving homelessness prevention assistance and not less than once annually for program participants receiving rapid re-housing assistance. Income limits shall not exceed 30% of AMI; the participants still lacks the resources and support networks necessary to retain housing.

11. Standards shall include any requirements the agency may have regarding the requirement of the program participant to notify the agency of any change in income, stability, support circumstances that would affect the program participant's need for assistance under the ESG program. If applicable, when notified of the relevant change, the agency shall include steps to re-evaluate the program participant's eligibility and amount and types of assistance the program participant needs.

12. If the program participant receives rental assistance or housing relocation and stabilization services, the Standards shall include the formal process for terminating a program participant that includes: 1) Written notice to the program participant containing a clear statement of the reasons for termination; 2) a review of the decision, in which the participant is given the opportunity to present written or oral objections before a person other than the person who made or approved the termination decision; and 3) prompt written notice of the final decision to the program participant. ***Included shall be language stating that termination does not bar the program participant from receiving assistance at a later date if the issue that caused the termination is resolved.***

COORDINATED ENTRY

CoC's coordinated entry process meets the requirements (below) established by the CoC Program interim rule.

- CES covers the entire geographic area claimed by the CoC.
- CES is easily accessed by individuals and families seeking housing or services.
- CES is well-advertised.
- CES includes a comprehensive and standardized assessment tool(s).
- CES provides an initial, comprehensive assessment of individuals and families for housing and services.
- CES includes a specific policy to guide the operation of the centralized or coordinated assessment system to address the needs of individuals and families who are fleeing, or attempting to flee, Domestic Violence / Victim Service Provider, dating violence, sexual assault, or stalking, but who are seeking shelter or services from non-victim specific providers.

SECTION 3: ESG COMPONENTS AND ELIGIBILITY

The ESG program is intended to assist people in preventing or ending their homelessness by supporting two primary functions: Emergency Response Activities, including emergency shelter operations and services as well as street outreach, and Housing Stability Activities including homelessness prevention and rapid re-housing. Funds can also be used for Homeless Management Information System (HMIS) participation and administration.

Program Components

Agencies participating in the ESG program and/or receiving ESG funds, are eligible to perform activities under the components outlined below:

Street Outreach

- Meet the immediate needs of unsheltered homeless people by connecting them with emergency shelter, housing, and/or critical health services. (See Street Outreach section for eligible activities)

Emergency Shelter

- Intended to increase the quantity and quality of temporary emergency shelters provided to homeless people by supporting the shelters operating expenses and essential services. (See Emergency Shelter section for eligible activities)

Rapid Re-housing

- Move homeless people individuals and families quickly into permanent housing through rental assistance and housing relocation and stabilization services. (See Rapid Rehousing section for eligible activities)

Homelessness Prevention

- Prevent households from becoming homeless through rental assistance, and housing relocation and stabilization services. (See Homeless Prevention section for eligible activities)

NC HMIS / Domestic Violence / Victim Service Provider Comparable Database

- Support ESG Subrecipients participation in the NC HMIS / or DV comparable database collection system. Federal law requires that Domestic Violence / Victim Service Provider agencies use Systems Comparable to HMIS rather than the HMIS used by other homeless agencies.

Homeless Definitions

The following chart summarizes the homeless definitions; the complete homeless definitions can be found at 24 CFR 576.2.

<p>Literally Homeless (Category 1)</p>	<p>Individual or family who lacks a fixed, regular, and adequate nighttime residence:</p> <ul style="list-style-type: none"> • Has a primary nighttime residence that is a public or private place not meant for human habitation; • Is living in a publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, hotels/motels paid for by charitable organizations or federal, state, and local government programs; or • Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution
<p>Imminent Risk of Homelessness (Category 2)</p>	<p>Individual or family who will imminently lose their primary residence, provided that:</p> <ul style="list-style-type: none"> • Residence will be lost within 14 days of the date of application for homeless assistance; • No subsequent residence has been identified; and • Lacks resources or support networks needed to obtain other permanent housing
<p>Homeless Under Other Federal Statutes (Category 3)</p>	<p>Unaccompanied youth under age 25, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:</p> <ul style="list-style-type: none"> • Are defined as homeless under other listed federal statutes; • Have not had a lease, ownership, or occupancy agreement in permanent housing during the 60 days prior to the date of homeless assistance application; • Have moved two or more times in the preceding 60 days; and • Can be expected to continue in such status for an extended period of time due to special needs or barriers
<p>Fleeing/Attempting to Flee Domestic Violence (Category 4)</p>	<p>Individual or family who:</p> <ul style="list-style-type: none"> • Is fleeing/attempting to flee Domestic Violence / Victim Service Provider; • Has no other residence; and • Lacks resources or support networks needed to obtain other permanent housing

The following chart summarizes which homeless definition each funding component may serve:

Component	Serving	
	Literally Homeless Individuals and Families	Homeless Individuals and Families at Risk of Homelessness
Street Outreach	X	
Emergency Shelter	X	
Homelessness Prevention		X
Rapid Re-Housing	X	

Program Participant Eligibility

Subrecipients must conduct an initial evaluation of eligibility (in accordance with the local LPS’s coordinated entry process) to determine:

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

Evaluations must be conducted in accordance with the local coordinated entry process and the agency’s written standards (24 CFR 576.400). Where possible, agencies should attempt to divert households from homelessness, including those seeking shelter who are currently housed but at imminent risk. However, households seeking shelter that are fleeing, or are attempting to flee, Domestic Violence / Victim Service Provider, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member should not be diverted.

Documenting Homeless Status

Per 24 CFR 576.500(b), the Subrecipient must maintain and follow written intake procedures to ensure compliance with homeless definitions and must include documentation required at intake to verify homeless status in order of HUD preference (1. Third-party observation, 2. Intake worker observation, 3. Self-certification from client seeking assistance). Appropriate homeless status documentation for intake files will vary depending on type of assistance provided and the circumstances of each participant. Lack of third-party documentation should not prevent a household from being immediately admitted to shelter, receiving street outreach services, or from receiving victims’ services and shelter.

SECTION 4: STREET OUTREACH

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

Eligible Activities:

- Engagement
- Case Management
- Emergency Health Services
- Emergency Mental Health services
- Transportation Costs
- Services for special populations (homeless youth, homeless persons with HIV/AIDS, etc.)

Engagement

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

- Making initial assessments of needs and eligibility
- Providing crisis counseling
- Addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries
- Providing information and referrals to programs targeted to homeless people, mainstream social services and housing programs (including emergency shelter, transitional housing, community-based services, permanent supportive housing and rapid re-housing.

The following services require an HMIS / DV Client identifying number:

Housing-Focused Case Management

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

- Participation in the centralized or coordinated assessment system of the local CoC
- Initial evaluation, verification and documentation of eligibility
- Counseling
- Developing, securing, and coordinating services
- Helping obtain Federal, state, and local benefits
- Monitoring and evaluating participant progress
- Providing information and referrals to other service providers
- Developing individualized housing and service plans

Emergency Health Services

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

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

Emergency Mental Health Services

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

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

Transportation Services

Travel by outreach workers, social workers, medical professionals, or other service providers during the provision of eligible street outreach services, including:

- Transporting unsheltered homeless individuals and families to emergency shelters or other service facilities
- Cost of a participant's travel on public transit
- Mileage allowance for outreach workers to visit participants
- Cost of staff to accompany or assist participants to use public transportation Costs associated with purchasing or leasing a vehicle are ineligible.

Services for Special Populations

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

SECTION 5: EMERGENCY SHELTER

Emergency shelter means any appropriate facility that has the primary use of providing temporary 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. ESG funds may be used for the costs of operating an emergency shelter and providing essential services to sheltered homeless people (24 CFR Part 576.102).

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.

The following services require an HMIS / DV Client identifying number:

Shelter Operations

Per 24 CFR part 576.403, emergency shelters must meet minimum safety, sanitation, and privacy standards related to the following topics. For a full description of the shelter standards, refer to the standards checklist, ESG Form 3.2. In addition:

- Shelter staff must conduct quarterly on-site inspections to ensure compliance with minimum habitability standards.
- The shelter must meet all standards for the entire period during which ESG funds are provided for operating the emergency shelter.
- If the shelter fails to meet the minimum standards, ESG funds may be suspended until the shelter is in compliance with minimum habitability standards.
- If the subrecipient moves the shelter to a new site or structure, that new site or structure must meet all emergency shelter standards (the ESG office must be made aware of the move and the inspection must be provided, before ESG funds will be released).

Shelter operations are costs are used to operate and maintain emergency shelters. They may also provide other emergency shelter lodging when appropriate. Eligible Costs include:

- Minor or routine maintenance
- Rent
- Security
- Fuel
- Insurance
- Utilities
- Food for shelter residents
- Furnishings (under \$500 per item; see expense guide)
- Equipment (under \$500 per item; see expense guide)
- Hotel or motel vouchers when no appropriate emergency shelter is available

The following services require an HMIS / DV Client identifying number:

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

- Case management
 - Childcare, education, employment, and life skills services
 - Legal services
 - Mental health,
 - Substance abuse services
 - Transportation
 - Services for special populations
-
- **Case Management** of assessing, arranging, coordinating and monitoring the delivery of individualized eligible services of:
 - Using a centralized or coordinated assessment system
 - Conducting the initial evaluation including verifying and documenting eligibility
 - Counseling
 - Developing, securing and coordinating services
 - Obtaining Federal, State and local benefits
 - Monitoring evaluating program participant progress
 - Providing information and referral to other providers
 - Providing ongoing risk assessment and safety planning with victims of Domestic Violence, dating violence, sexual assault, and stalking
 - Developing an individualized housing and service plan, including planning a path to permanent housing stability

- **Child Care** is an allowable cost for children under the age of 13 unless the child is disabled. Disabled children must be under the age of 18. The child care must be licensed by the jurisdiction in which it operates to be eligible.
- **Educational Services.** 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.
- **Employment assistance and job training.** Job Assistance services help participants to secure employment and placement in job training programs.
- **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 / Victim Service Provider, dating violence, sexual assault, and stalking, appeal of veterans and public benefit claim denials, and resolution of outstanding criminal warrants.
- **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.
- **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.
- **Transportation** for costs of travel by program participants to and from medical care, employment, child care, or other eligible essential services facilities.
- **Services for special populations** to provide services for homeless youth, victim services (assisting program participants who are victims of Domestic Violence, dating violence, sexual assault, or stalking) and for people living with HIV/AIDS, so long as

the costs of providing these services are eligible. Victim Services include services offered by rape crisis centers and Domestic Violence / Victim Service Provider shelters and other organizations with a documented history of effective work concerning Domestic Violence, dating violence, sexual assault or stalking.

SECTION 6: RAPID RE-HOUSING (RRH) & HOMELESS PREVENTION (HP)

Rapid Re-housing is to move literally homeless individuals and families (24 CFR 576.104) quickly into permanent housing and achieve stability in that housing. Participants must meet Category 1 or 4 of the homeless definition and have an annual income below 30 percent of the area median income, as determine by HUD, at initial evaluation.

Homelessness Prevention prevents households from becoming literally homeless. Participants must meet Category 2, 3, or 4 of the homeless definitions and have an annual income below 30 % of area median income, as determined by HUD, at initial evaluation. Households may only be assisted under this component as long as they the assistance is necessary to regain stability in permanent housing.

	Rapid Re-Housing	Homelessness Prevention
Eligible Participants	<p>Category 1 – Literally Homeless</p> <p>Category 4 – Fleeing/Attempting to Flee Domestic Violence and has no other residence.</p>	<p>Category 2 – Imminent Risk</p> <p>Category 3 – Other Federal Statutes</p> <p>Category 4 – Fleeing/Attempting to Flee Domestic Violence and has no other residence or at-Risk of Homelessness</p>
Purpose	<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 	<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
Reassessment	<ul style="list-style-type: none"> Every 12 months Must have income <u>at or below</u> 30% AMI, AND Lack resources and support network 	<ul style="list-style-type: none"> Every 3 months Must have income <u>at or below</u> 30% AMI, AND Lack resources and support network
Eligible Activities	Housing Relocation and Stabilization Services and Financial Assistance	Housing Relocation and Stabilization Services and Financial Assistance
	Short- and Medium-Term Rental Assistance	Short- and Medium-Term Rental Assistance

Participant Income

Income requirements do not apply to program participants who are being served under Emergency Shelter or Street Outreach components.

Individuals and families applying for ESG Homelessness Prevention must have incomes below 30 percent of AMI at initial evaluation. Individuals and families applying for ESG Rapid Re-housing do not need an income assessment at initial evaluation but must have incomes less than or equal to 30 percent of AMI at annual re-evaluation. When determining the annual income of a household, the Subrecipient must refer to the standards for calculating income per 24 CFR 5.609. Current ESG Income Limits can be found on HUD's website and are also posted on NC ESG's website at: <https://www.ncdhhs.gov/nc-emergency-solutions-grant-%E2%80%93-grantee-sub-grantee-documents>

Inclusions

- Earned income (wages, salaries, net income from operating of a business or profession)
- Interest and dividend income
- Pension/retirement income
- Unemployment and disability
- TANF/Public Assistance
- Alimony and child support income
- Regular contributions or gifts from organizations or persons not residing in the dwelling
- Armed forces income
- Any other income included in the HUD Handbook 4350.3, REV-1, Chapter 5, Exhibit 5-1

Exclusions

- Income of children (including foster care payments)
- Inheritance and insurance income
- Medical expense reimbursements
- Income of live-in aides
- Certain state payments regarding disability
- Student financial aid
- Armed forces hostile fire pay
- Temporary, non-recurring, or sporadic income
- Certain reparation payments
- Earnings in excess of \$480 for each full-time student who is 18 years old or older (excluding the head of household and spouse)
- Adoption assistance payments in excess of \$480 per adopted child
- Deferred periodic amounts from SSI or social security benefits that are received in a lump sum amount or in prospective monthly amounts
- Refunds or rebates for property taxes
- Amounts paid by the state to offset the cost to allow a developmentally disabled family member to remain in the home

- Any other exclusions included in the HUD Handbook 4350.3, REV-1, Chapter 5, Exhibit 5-1
- Income requirements do not apply to program participants who are being served under Emergency Shelter or Street Outreach components.

Re-Evaluating Participation

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

- At least once annually for Rapid Re-housing assistance, the re-evaluation must establish:
 - The program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance
 - Annual household income is less than or equal to 30 percent of the AMI
- At least once every three months for Homelessness Prevention assistance, the re-evaluation must establish:
 - The program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance
 - Annual household income is less than or equal to 30 percent of the AMI

Housing Relocation and Stabilization Services

ESG funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing.

The following services require an HMIS / DV Client identifying number:

- Housing stability case management
- Housing search and placement
- Mediation
- Legal services
- Credit repair
- **Housing Stability Case Management:** While providing Homelessness Prevention or Rapid Re-Housing Assistance, the case manager must:
 - Meet with the participant not less than once per month to assist the program participant in ensuring long-term housing stability (unless the Subrecipient/sub-Subrecipient is exempt from this requirement under the Violence Against Women Act (VAWA) or the Family Violence Prevention

and Services Act which prohibit making its shelter or housing conditional on the participant's acceptance of services); and

- Develop a plan to assist the program participant to retain permanent housing after the ESG assistance ends, taking into account all relevant considerations such as the participant's current or expected income and expenses; other public or private assistance for which the participant will be eligible and likely to receive; and the relative affordability of available housing in the area.
- **Housing Search and Placement:** ESG funds may be used for services or activities designed to assist individuals or families in locating, obtaining, and retaining suitable permanent housing include the following:
 - Assessment of housing barriers, needs, and preferences
 - Development of an action plan for locating housing;
 - Housing search;
 - Outreach to and negotiation with landlords/property owners;
 - Assistance with submitting rental applications and understanding leases;
 - Assessment of housing for compliance habitability, lead-based paint, and rent reasonableness;
 - Assistance with obtaining utilities and making moving arrangements
 - Tenant counseling
- **Mediation:** ESG funds may pay for mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the program participant from losing permanent housing in which the program participant currently resides.
- **Legal Services:** ESG funds may pay for legal services, as set forth in § 576.102(a)(1)(vi), except that the eligible subject matters also include landlord/tenant matters, and the services must be necessary to resolve a legal problem that prohibits the program participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which the program participant currently resides.
- **Credit Repair:** ESG funds may pay for credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.

Financial Assistance

- Rent application fees
 - Security and utility deposits
 - Last month's rent
 - Utility payments
 - Moving costs
-
- **Rental application fees:** ESG funds may pay for the rental housing application fee that is charged by the owner to all applicants
 - **Security deposits:** ESG funds may pay for a security deposit that is equal to no more than 2 months' rent. In contrast to the requirements regarding rental assistance payments, security and utility deposits covering the same period of time in which assistance is being provided through another housing subsidy program are eligible, as long as they cover separate cost types. One example of this would be providing a security deposit for a participant receiving a HUD VA Supportive Housing (VASH) voucher, which provides rental assistance and services.
 - **Last month's rent.** If necessary to obtain housing for a program participant, the last month's rent may be paid from ESG funds to the owner of that housing at the time the owner is paid the security deposit and the first month's rent. This assistance 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 deposits:** ESG funds may pay for a standard utility deposit required by the utility for all customers for the utilities listed under the utility payment section
 - **Utility payments:** ESG funds may pay for up to 24 months of utility payments per program participant, per service, including up to 6 months of utility payments in arrears, per service a partial payment of a utility bill counts as one month. This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments. Eligible utility services are gas, electric, water, and sewage. No program participant shall receive more than 24 months of utility assistance within any 3-year period.
 - **Moving cost assistance:** ESG funds may pay for moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance for services (housing search & placement and/or case management) and before the

program participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.

Short- and Medium-Term Rental Assistance

May be provided under homeless prevention and rapid rehousing.

- Short-term: up to three months
- Medium-term: four to 24 months
- Rental Arrears: One-time payment of up to six months rental arrears, including late fees on the arrears
- **Use with other subsidies.** 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 of time covered by the URA payments.

Restrictions

Rental units must comply with:

- Fair Market Rent (FMR) limits (24 CFR Part 888) and Rent Reasonableness (24 CFR 982.507)
- Rental Assistance Agreements. The sub recipient can make rental assistance payments only to an owner with whom the sub recipient has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided, including the requirements that apply under this section. The rental assistance agreement must provide that, during the term of the agreement, the owner must give the sub recipient a copy of any notice to the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program participant.
- Lead-Based Paint and Minimum Habitability Standards. All housing occupied by ESG program participants must be inspected for lead-based paint in accordance with 24 CFR 35. ESG funds must be used to help participants obtain or maintain housing that meets minimum habitability standards (24 CFR 576.403).
- Maximum Assistance. The maximum period for which any program participant may receive ESG services must not exceed 24 months during any three-year period.
- Late payments. The sub recipient must make timely payments to each owner in accordance with the rental assistance agreement. The rental assistance agreement must

contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease. The sub recipient is solely responsible for paying late payment penalties that it incurs with non-ESG funds.

- Lease. Each program participant receiving rental assistance must have a legally binding, written lease for the rental unit, unless the assistance is solely for rental arrears. The lease must be 12 months, between the owner and the program participant. Where the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease, if the agreement gives the program participant an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented by the owner's financial records, rent ledgers, or canceled checks.
- Tenant-based rental assistance. A program participant who receives tenant-based rental assistance may select a housing unit in which to live and may move to another unit or building and continue to receive rental assistance, as long as the program participant continues to meet the program requirements.
 - The recipient may require that all program participants live within a particular area for the period in which the rental assistance is provided.
 - The rental assistance agreement with the owner must terminate and no further rental assistance payments under that agreement may be made if:
 - The program participant moves out of the housing unit for which the program participant has a lease;
 - The lease terminates and is not renewed; or
 - The program participant becomes ineligible to receive ESG rental assistance.

SECTION 7: HMIS AND COMPARABLE DATABASE

HMIS or DV comparable database, participation is a requirement to receive ESG funds, therefore costs associated with contributing data to the HMIS or comparable database are eligible for reimbursement. Activities must comply with HUD's standards on participation, data collection and reporting, including compliance with HUD's "2017 HMIS Data Dictionary" and "2017 HMIS Data Manual" found at: <https://www.hudexchange.info/programs/hmis/hmis-data-and-technical-standards/>. (24 CFR 576.107)

Eligible Activities for Subrecipients

- Hardware, equipment and software costs
- Purchasing or leasing computer hardware
- Purchasing software or software licenses
- Purchasing or leasing equipment, including telephones, taxes, and furniture
- Salaries for operating the HMIS/comparable database
- Data collection and reporting
- Completing data entry
- Monitoring and reviewing data quality
- Completing data analysis
- Training staff on using the HMIS or comparable database:
- Implementing and complying with HMIS/comparable database requirements
- Training and overhead
- Obtaining technical support
- Leasing office space
- Paying charges for electricity, gas, water, phone service and high-speed data transmission necessary to operate or contribute data to the HMIS/comparable database
- Paying costs of staff to travel to and attend HUD-sponsored and HUD-approved training on HMIS/comparable database and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act
- Paying staff travel costs to conduct intake
- Paying participant fees charged by the HMIS/comparable database lead agency

Eligible Activities for HMIS/comparable database Lead Agencies

- Hosting and maintaining HMIS/comparable database software or data
- Backing up, recovering, or repairing HMIS/comparable database software or data
- Administering the HMIS/comparable database system
- Providing reports and information to service providers, the CoC, HUD, and/or the NC ESG office
- Conducting training on using the system or a comparable database, including travel
- Assessing if Domestic Violence/ victim services providers databases are HMIS comparable and providing verification to NC ESG

SECTION 8: REPORTS AND HMIS/COMPARABLE DATABASE

While HUD expects all homeless service providers to collect and enter complete and accurate client information into HMIS/comparable database, clients have the right to refuse to participate. Service providers cannot refuse services to a client solely because the client refuses to participate in HMIS/comparable database. CoCs, HMIS Lead Agencies and service providers are required to ensure confidentiality and to protect the privacy of *all* clients served.

Homeless Management Information System (24 CFR Parts 91.576 and 583) / Comparable Database (24 CFR 580.25 (1))

The Homeless Management Information System (“HMIS”)/Victim Service Providers Comparable Database is a secure, confidential electronic data collection system used to determine the nature and extent of homelessness. HMIS/comparable databases are used to report to HUD on an annual basis and aid in local and statewide policy and planning. Failure to enter data on a regular and consistent basis may result in the termination of the ESG agreement.

NC ESG Office will regularly monitor HMIS/comparable database usage to verify consistent data entry for applicable program components. Data must be entered for all ESG funded programs serving homeless individuals and families.

Subrecipients, including Victim Service Providers, are required to collect and enter into HMIS/comparable database all UDEs, program specific data elements, and service transactions terms and codes at the client-level for all clients served. The HMIS UDEs are determined by HUD and published in the 2017 HMIS Data Standards. All Subrecipients are required to provide aggregate data (for example, CAPER) to the CoC and ESG Office for reporting purposes. Client-level data including personally identifying information should never be stored in unsecured platforms including but not limited to Excel or Google Docs.

As noted previously in the *ESG Components and Eligibility* Section of this Desk Guide, Victim Service Providers may use program funds to establish and operate a comparable database.

UDEs, program specific data elements, and service transaction terms and codes are outlined in **Appendix C**.

Statewide Data Collection

All NC ESG subrecipients are required to meet the following minimum standards for Statewide ESG data collection and reporting:

- Execute the HMIS/ESG Agency Participation Agreement and be compliant with Lead or CoC User Policies (not applicable to DV agencies using comparable database).
- Have active HMIS/comparable database users with a unique assigned user name and password.
- Attend all required database trainings as designated by lead database provider and/or CoC/LPA.
- Have access to a computer with a high-speed Internet connection.
- Participation in the annual Statewide Point-in-Time count.

SECTION 9: 2018 NC ESG QUARTERLY REPORTS

All subrecipients must submit a NC ESG Quarterly Performance Report by the following dates:

Report	Reporting Time Period	Due Date
Q1	January 1 – March 31, 2018	June 30, 2018
Q2	January 1 – June 30, 2018	July 31, 2018
Q3	January 1 – September 30, 2018	October 31, 2018
Q4	January 1 – December 31, 2018	January 31, 2019

Appendix D outlines the data that subrecipients will use to complete the NC ESG Quarterly Performance Report. It also details which HMIS reports should be run to obtain the correct data.

The report form and instructions on the quarterly report will be released in April 2018.

EXAMPLE AGENCY	EXAMPLE PROJECT	ESG Quarterly Report	3/21/2018	Jan - Mar
5a - Report Validation Table				
	Jan-Mar	Jan - Jun	Jan - Sep	Jan - Dec
Total Number of Persons Served				
Number of Adults (age 18 or over)				
Number of Children (under age 18)				
Number of Persons with Unknown Age				
Number of Leavers				
Number of Adult Leavers				
Number of Adult and Head of Household Leavers				
Number of Stayers				
Number of Adult Stayers				
Number of Veterans				
Number of Chronically Homeless Persons				
Number of Youth under Age 25				
Number of Parenting Youth Under Age 25 with Children				
Number of Adult Heads of Household				
Number of Child and Unknown-Age Head of Households				
Head of Households and Adult Stayers in Project 365 Days or More				
1. Living Situation				
Homeless Situations	Jan-Mar	Jan - Jun	Jan - Sep	Jan - Dec
Emergency shelter, including hotel or motel paid for with emergency shelter voucher				
Transitional housing for homeless persons (including homeless youth)				
Place not meant for habitation				
Safe Haven				
Interim Housing				
Subtotal				
Institutional Settings	Jan-Mar	Jan - Jun	Jan - Sep	Jan - Dec
Psychiatric hospital or other psychiatric facility				
Substance abuse treatment facility or detox center				
Hospital or other residential non-psychiatric medical facility				
Jail, prison, or juvenile detention facility				
Foster care home or foster care group home				
Long-term care facility or nursing home				
Residential project or halfway house with no homeless criteria				
Subtotal				
Other Locations	Jan-Mar	Jan - Jun	Jan - Sep	Jan - Dec
Permanent Housing (other than RRH) for formerly homeless persons				
Owned by client, no ongoing housing subsidy				
Owned by client, with ongoing housing subsidy				
Rental by client, no ongoing housing subsidy				
Rental by client, with VASH subsidy				
Rental by client with GPD TIP subsidy				
Rental by client, with other housing subsidy				
Hotel or motel paid for without emergency shelter voucher				
Staying or living in a friend's room, apartment or house				
Staying or living in a family member's room, apartment or house				
Emergency Shelter Instructions CAPER 0640 Report 0700 Report Utilization Report Metrics +				

SECTION 10: 2018 CONTRACT PERFORMANCE MEASURES

The following performance measures are included in the ESG FY2017-2018 contracts (approximately pages 23) and all subrecipients are expected to comply with contract performance standards. The NC ESG Office uses performance measures rubrics as a tool to determine the success of a project and how well services and products are being delivered. Together they enable the NC ESG Office to determine efficiency, progress toward desired results, assess whether the organization is on track with meeting its goals and determining future funding awards.

1. MEASURE DATA

<u>Measure</u>	Contractor must participate and ensure data entry into a HMIS/compatible data system.
<u>Explanatory note</u>	It is a requirement of HUD that all ESG program contractors and sub-contractors provide accurate data for the Consolidated Annual Performance Evaluation Report (CAPER) yearly.
<u>Compliance</u>	Accurate submission by the designated deadline, by the Subrecipient of the NC ESG Quarterly Reports and CAPER.

2. MEASURE DATA

<u>Measure</u>	Contractor must meet or exceed 80% of program standards
<u>Explanatory note</u>	Program standards are followed as a condition of funding
<u>Compliance</u>	On-site or desk monitoring by the ESG Office yields 20% or less findings / concerns in cumulative records reviewed during the monitoring period. (Examples: requisitions, client files, written standard adherence, coordinated entry participation etc.)

3. MEASURE DATA

<u>Measure</u>	Contractor will assure that all funds allocated are requisitioned monthly and spent within the terms of the contract.
<u>Explanatory note</u>	Requests for allocated fund reimbursement must be made monthly and all funds used by the close of the contract period.
<u>Compliance</u>	Subrecipient submitted 1 requisition per month within the 45 day submission period, with at least 1 requisition leading to a disbursement of ESG funds per quarter.

4. MEASURE DATA

<u>Measure</u>	Contractor must expend 100% of funds by the end of the contract
<u>Explanatory note</u>	All funds must be expended per HUD guidelines within the time provided
<u>Compliance</u>	Subrecipient requested reimbursements of incurred and paid expenses for 100% of the organization's ESG award during the program year January 1, 2018 – December 31, 2018.

5. MEASURE DATA

<u>Measure</u>	Contractor will assure the accuracy of reimbursement submissions 90% of the time
<u>Explanatory note</u>	Reimbursement accuracy is key to assuring programs receive funding in a timely and accurate manner. Incorrect submissions delay reimbursement and effect overall spending.
<u>Compliance</u>	10 or more requisition submissions by the subrecipients were not discarded.

SECTION 11: RECORDKEEPING REQUIREMENTS

Records to Maintain – Costs Incurred

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

Records to Maintain - Program Participants

Record	Criteria	Applicable Components
Homeless Status	<ul style="list-style-type: none"> • Verification of Homelessness (Form 1.2) • Verification of At Risk of Homelessness (Form 1.3) • Third party supporting documentation of homeless situation • Self-Declaration of Homelessness (Form 1.4) 	SO, ES, HP, RRH
Income Worksheet, as applicable	<ul style="list-style-type: none"> • Form 2.4 • Details household's annual income eligibility 	HP, RRH
Supporting Documentation of Sources of Income	<ul style="list-style-type: none"> • Third-party verification of proof of gross annual income is needed for all members of the household age 18 and over • Pay stubs, SSI/SSDI award letter/printout, child support statement, EBT statement for TANF • If income source documents are unobtainable, ESG-207 Verification of Income form may be completed 	HP, RRH
Photo Identification	<ul style="list-style-type: none"> • Needed for all members of the household age 18 and over • Driver's license, state ID, temporary ID/license, school ID with photo, passport-U.S. or foreign, U.S. passport card, permanent resident card, etc. 	HP, RRH
Initial Consultation Documentation	<ul style="list-style-type: none"> • Agency Intake Documentation (Form 1.3 A, 1.3 B or Form 1.5) 	SO, ES, HP, RRH
Case Management Documentation	<ul style="list-style-type: none"> • Assessing, arranging, coordinating, and monitoring delivery of services to facilitate housing stability • Notes must be dated and detail housing goals, plans, referrals • Form 1.8., Form 1.9, Form 6.1 	SO, ES, HP, RRH
Proof of Need	<ul style="list-style-type: none"> • Documentation provided by participant to determine amounts/types of assistance needed for the household to gain stability in permanent housing • Utility bills, lease, arrears, eviction documentation • Income documentation (noted previously) 	SO, ES, HP, RRH

Proof of Payment for ESG reimbursement of Housing Stabilization Activities	<ul style="list-style-type: none"> • Canceled check/check register/bank statement showing payments cleared highlighted and/or returned checks log 	HP, RRH
Rental Assistance Agreement	<ul style="list-style-type: none"> • Agreement between the landlord and ESG Subrecipient (Form 3.4) • Applicable only to households receiving Rental Assistance 	HP, RRH
Lease	<ul style="list-style-type: none"> • 12-mo Lease between program participant and landlord • Households assisted with Rental Assistance must have a written lease for the rental unit 	HP, RRH
Eligibility Certification	<ul style="list-style-type: none"> • Verifies client eligibility for ESG (Form 1.10) 	SO, ES, HP, RRH
Habitability Inspection	<ul style="list-style-type: none"> • Verifies shelter and housing assisted with ESG meet minimum habitability standards (Form 3.2) 	ES, HP, RRH
Lead-based Paint Inspection	<ul style="list-style-type: none"> • Form 3.3 A - F 	HP, RRH
Rent Reasonableness and Fair Market Rent Certification	<ul style="list-style-type: none"> • Verifies rent for unit assisted with ESG does not exceed the lesser of the Fair Market Rent or the rent reasonableness standard (Form 3.1 A) 	HP, RRH
Consent Form	<ul style="list-style-type: none"> • Client Release of Information, Acknowledgement of Rights , and Sharing Plan (Form 1.6) 	SO, ES, HP, RRH
Social Security Identification	<ul style="list-style-type: none"> • Social Security number needed for all members of the household • Social Security Card, printout from social security office 	HP, RRH

SECTION 12: MONITORING

The NC ESG office will monitor a minimum of 20% of the total ESG Subrecipients every year on site. New subrecipients will be monitored within the first year of their grant agreement. On-site monitoring visits are made to selected subrecipients by ESG program staff to verify program compliance, to review financial records, and to review administrative structures and practices. Results of on-site monitoring visits are shared with subrecipient organizations that have been monitored. Back-up documentation that is submitted with monthly reimbursement requests is also reviewed on a regular basis throughout the program year.

Subrecipients are expected to make available all participant level, financial, and program records for periodic review. Significant deficiencies in file content or quality will result in required Plans of Corrective Action, with possible loss of allocated funds upon discovery of continuing deficiencies.

Program compliance, HMIS / Comparable database usage, and data integrity will also be subject to regular and random monitoring by NC ESG staff. Monitoring of subrecipients may be conducted by the NC ESG, local HUD Office of Community Planning and Development, HUD's Office of Special Needs Assistance Programs, HUD's Office of Inspector General, HUD's Office of Fair Housing and Equal Opportunity, or other federal / state agency to determine whether the subrecipient complied with the requirements of this program. NC ESG staff will monitor Subrecipients' by conducting on-site compliance reviews and desk audits to track a Subrecipient's program compliance, ensure accurate spending of ESG funds, prevent fraud and abuse, and identify technical assistance needs.

Desk Monitoring

ESG program staff will review source documentation for at least one requisition (reimbursement) request per Subrecipient/quarter. For the quarterly review, staff will review all supporting documentation for accuracy and eligibility. Each Subrecipient will have at least 4 requisition requests per year reviewed. Desk Monitoring may also include the review of client files, program policies and procedures, financial policies, etc.

On-Site Compliance Visits

On-site compliance visits will be conducted at the location designated by NC ESG staff.

The four primary goals of the on-site compliance visit are to:

1. Ensure productivity and accountability
2. Ensure compliance with the Emergency Solutions Grant (ESG) which includes participant eligibility, eligible activities, unit requirements, financial management, data collection and reporting and other federal requirements;
3. Evaluate organizational and project performance; and
4. Other relevant sections pertained in the ESG Contract.

Announced Visit

The announced site visit is scheduled by the NC ESG program staff with the Subrecipient. Once the visit is scheduled, the Subrecipient will be provided written guidance which details the expectations for the visit.

Unannounced Visit

NC ESG staff members have the right to conduct unannounced visits at the location(s). It is the Subrecipient's responsibility to notify the NC ESG Office of changes in business hours or if the Subrecipient will be closed for an extended amount of time. Unannounced site visits are conducted based on certain factors, including but not limited to, agency's prior history with ESG, concerns/deficiencies noted in Subrecipient's audit and/or financial statements, outcome of announced visit, and fulfilling grant requirements such as timely and accurate submission of Requests for Payment.

Electronic Files

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

Habitability Standards

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

Exit Interview

At the conclusion of the site visit, NC ESG staff will discuss the findings of the visit with the appropriate Subrecipient staff member(s). The Subrecipient will be given the opportunity to discuss the findings as well as any other questions and concerns with the NC ESG staff.

Fiscal Sponsors

The NC ESG staff will monitor fiscal sponsors for compliance. Fiscal Sponsors are responsible for ensuring the compliance and reporting of their sub-contractors with all ESG program regulations as well as:

- Reimburse ESG sub-contractors for eligible ESG activities
- Submit reimbursement requests to the State on behalf of its subcontractors
- Serve as the central point of contact for all reporting requirements
- Conduct monitoring visits and training opportunities for subcontractors
- Act as the point of contact for NC ESG Office monitoring visits

Compliance Violations

If the NC ESG staff member finds that the Subrecipient is out of compliance, the NC ESG staff member will record that the Subrecipient is out of compliance. Until the NC ESG staff member has verified that the issue(s) has/have been resolved, ESG funding could be suspended. Violations will be noted in Subrecipient's records, and may affect current and / or future application cycles.

SECTION 13: FINANCIAL PROCESS

Before a subrecipient may first request reimbursement for ESG funds expended on specific activities/budget line items, the following items must be received by the NC ESG Office:

- Requested documentation in response to special considerations (if applicable)
- Completed budget page;
- Signed / executed contract, by both parties;

Matching Funds

Not required for the FY2018 grant cycle

Each subrecipient must match dollar-for-dollar the ESG funding provided by HUD with funds from other public or private sources. A subrecipient may comply with this requirement through matching funds or voluntary efforts provided by any recipient or project sponsor.

Matching funds must be provided after the date of the grant award to the subrecipient. Funds used to match a previous ESG grant may not be used to match a subsequent grant award. No federal funds can be used for match, with the exception of Community Development Block Grant (CDBG) and Community Service Block Grant (CSBG) funds.

All ESG Subrecipients are required to contribute 100% match to their ESG program. For example, if the ESG award is \$10,000, the subrecipient must demonstrate \$10,000 as match. The following items may be used as match:

Type of Match	Documentation required
Cash/Grant	Award letter
Value or fair rental value of any donated material or building	Documentation of value of donated material or building. Documentation of previous year's match.
Value of any lease on a building	Documentation of value of lease on a building
Any salary paid to staff to carry out the program of the subrecipient	Timecards of staff member. Proof of salary payment (cancelled checks / bank statements). Summary list of all salaries counted as match. List should contain staff name, hours worked and total monetary value of time worked.
Value of the time and services contributed by volunteers to carry out the program of the subrecipient. (Note: Volunteers providing professional services such as medical or legal services are valued at the reasonable and customary rate in the local community.)	List containing all volunteer names, number of hours worked and total value of time contributed.

Request for Reimbursement

ESG grants are provided on a reimbursement basis only, therefore ESG funds must be expended (incurred and paid) on eligible activities for eligible program participants before funds can be requested. Before Subrecipients can request reimbursement for FY2017-2018, the following criteria must be met:

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

Once all of the above criteria are met and Subrecipient has expended funds on eligible ESG activities, Subrecipient may request FY2017-2018 funds using the Requisition forms located: <https://www.ncdhhs.gov/requisition-documents>

Submission Requirements:

Funded agencies must submit a requisition and supporting documentation electronically by emailing the documents to the NC ESG community email address listed below. Requisitions must be submitted on NC ESG Office approved forms ([link](#)). Requisition submissions via post mail or a different email address **will not be accepted**.

Submit requisitions electronically to: NC ESG email address: ncesg@dhhs.nc.gov

Requisition Timeline

- Requisition submission must be received by the NC ESG Office no later than 45 days after the last billing day of the month for which the reimbursement is being requested.
- If approved: requisition will be submitted for reimbursement to the State Controller office. (turnaround generally 30 business days)
- If discarded: agency’s financial contact, executive director, and/or authorized signer will receive discard notification and reason for discard by email (see correction process below for resubmission prior to deadline)

Discard Process

(Requisitions should be reviewed prior to submission in order to reduce risk of discard)

- Requisition will be discarded if found incomplete, incorrect, or received after the 45-day submission deadline.
- The first discarded requisition will be returned by email to the organization’s preparer of the requisition.
- The second discarded requisition will be returned by email to the organization’s preparer with notification to the executive director, and/or authorized signer.
- The discarded requisition must be corrected and resubmitted prior to the 45-day submission deadline.
- Requisitions discarded after the 45-day submission deadline may not be processed by the NC ESG Office.

Correction Process of Discarded Requisitions

- Requisition preparer receives discarded requisition email from the NC ESG Office detailing the corrections requested.
- Organization makes the appropriate changes to the requisition requested by the NC ESG Office.
- Organization resubmits the requisition to the NC ESG Office electronically to: NC ESG community email address: ncesg@dhhs.nc.gov prior to the 45-day submission deadline.
- If submitted after the 45-day submission deadline, requisition may not be processed by the NC ESG Office.

Correction Process for Organization Discovered Errors

If the organization discovers an error or omission after submitting a requisition request:

- Send an email to ncesg@dhhs.nc.gov requesting the submission be discarded;
- Wait for notification from the ESG office that the requisition has been discarded
- Then, resubmit the full requisition including the corrected or additional information
- Once processed, requisitions cannot be recalled

Electronic Submission

- Email to NC ESG Community email: ncesg@dhhs.nc.gov
- Requisitions submitted to other email addresses will not be accepted
- Only one email per subrecipient per month will be accepted; exceptions may be made with prior approval from the NC ESG Office.
- All requisition documents should be sent via one PDF in the order required
 - [See ESG Requisition Checklist](#)
 - Include corresponding HMIS # (or client identifying #) on all documents redacting all personal identifying information to preserve client confidentiality.
- Requisitions are processed in the order received
- All questions regarding requisitions should be submitted to kim.crawford@dhhs.nc.gov or chris.battle@dhhs.nc.gov or ethel.cooley@dhhs.nc.gov

Budget Amendments

- Must request budget amendment to change funding amounts within contract
 - Movement of funding between budget categories within the same activity – for example, from RRH Financial Assistance to RRH Services
 - Movement of funding between budgets from one activity to another – for example, from Shelter to RRH
- One budget amendment allowed per grant quarter
- Must be requested to NC ESG Office on budget request form with the following:
 - Budget Amendment Request Form
 - Justification on company letterhead
 - Submit electronically to kim.crawford@dhhs.nc.gov
- Subrecipient will be unable to request reimbursement using new budget until amendment documents are received and executed by both parties

Requisition Best Practices

- Review entire requisition before submission
- Compile all required documents in the order outlined in the ESG Requisition Checklist and scan as one PDF file
- Review scanned file to make sure it is legible
- Ensure adequate prep time for timely and accurate submission, allowing for resubmission of discarded requisition(s) if necessary

Quarterly Reimbursement

The Subrecipient must have a minimum of one disbursement of funds per quarter. Requisitions that result in discard do not fulfill the quarterly disbursement requirements. Requisitions must be received no later than 45-days after the last day of the billing month.

Subrecipients must requisition for at least the percentage detailed in the chart below, per quarter. Subrecipients will be placed in a tier based on their disbursement percentage each quarter. Tier levels are used to determine performance and future funding opportunities.

Quarter	Percentage	Deadline
1 st Quarter	20%	April 15
2 nd Quarter	40%	July 15
3 rd Quarter	65%	November 15
4 th Quarter	100%	January 15

	Quarter 1 April 15, 2018	Quarter 2 July 15, 2018	Quarter 3 November 15, 2018
Tier 1	20%	40%	65%
Tier 2	12-19%	30-39%	55-64%
Tier 3	0-11%	29% and lower	54% and lower

Spending Deadline

Subrecipients are required to exhaust the entire grant award on or before the end of the fourth quarter (December 31, 2018). The NC ESG Office has the discretion to recapture a portion or all remaining ESG funds as of this deadline.

OMB Audit Requirements

Subrecipients that expend \$750,000 or more in federal funds (as a collective whole from all of their federal awards) in a fiscal year must be audited in accordance with the requirements of 2 CFR 200.501, and provide a copy of such audit to NC ESG Office and to the Federal Audit Clearinghouse.

Internal Controls

The subrecipient must:

- Establish and maintain effective internal control over federal funds that provides reasonable assurance that the subrecipient is managing federal funds in compliance with Federal statutes, regulations, and the terms and conditions of the federal funding. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the Comptroller General of the United States.
- Take prompt action when instances of noncompliance are identified including noncompliance identified in audit findings.
- Take reasonable measures to safeguard protected personally identifiable information and other information that the NC ESG Office or HUD designates as sensitive or the subrecipient considers sensitive consistent with applicable Federal, state, local, and tribal laws regarding privacy and obligations of confidentiality.

Mandatory Disclosure

The subrecipient must disclose, in a timely manner, in writing to the NC ESG Office, all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the ESG funds. The subrecipient’s failure to make these disclosures may subject to the subrecipient to remedies of non-compliance set forth in 2 CFR 200.338.

SECTION 14: CONFLICT OF INTEREST

Requirements (24 CFR 576.404) (2 CFR Part 200.112)

The provision of any type or amount of ESG assistance may not be conditioned on an individual's or family's acceptance or occupancy of emergency shelter or housing owned by the subrecipient, or a parent or subsidiary of the subrecipient. No subrecipient may, with respect to individuals or families occupying housing owned by the subrecipient, or any parent or subsidiary of the subrecipient, carry out the initial evaluation required under 24 CFR 576.401 or administer homelessness prevention assistance under 24 CFR 576.103.

The subrecipient must maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of contracts. No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. The officers, employees, and agents of the subrecipient may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, the subrecipient may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value. The standards of conduct must provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the subrecipient.

If the subrecipient has a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe, **the subrecipient must maintain written standards of conduct covering organizational conflicts of interest.** Organizational conflicts of interest means that because of relationships with a parent company, affiliate, or subsidiary organization, the subrecipient is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization.

HUD Procedure for Individual Conflicts of Interest Conflicts Prohibited

No persons (as described in persons covered) who exercise or have exercised any functions or responsibilities with respect to ESG activities or who are in a position to participate in a decision making process or gain inside information with regard to such activities, may obtain a financial interest or benefit from the activity, or have an interest or benefit from the activity, or have an interest in any contract, subcontract or agreement with respect thereto, or the proceeds there under, either for themselves or those with whom they have family or business ties, during their tenure or for one year thereafter.

Persons Covered

The conflict of interest provisions applies to any person who is an employee, agent, volunteer, consultant, officer, elected official or appointed official of:

- the State and/or,
- a unit of general local government and/or,
- any designated public agencies representative and/or
- subrecipients receiving ESG funds.

SECTION 15: OTHER FEDERAL REQUIREMENTS

Lead-Based Paint Requirements

“Lead-based paint hazards” have been defined in the Residential Lead-Based Paint Hazard Reduction Act of 1992, commonly referred to as “Title X,” as any of six conditions which can present lead exposures sufficient to cause adverse health effects.

The only ESG-assisted housing covered under the lead-based paint requirements is longer-term housing in an apartment with one or more bedrooms AND which has family residents who are part of a program requiring continual residence of more than 100 days.

The EPA Lead brochures must be distributed to all households receiving long-term rental assistance. Documentation of this brochure must be maintained in each client file.

If there will be a child under the age of 6 residing in the unit receiving ESG long-term housing, the award sub recipient must conduct a visual assessment for the presence of lead-based paint. Award sub recipients cannot provide long-term rental assistance to any unit with lead-based paint present.

Lead Hazard Evaluation

The interior and exterior surfaces and common areas of the rental property must be visually assessed to identify deteriorated paints. Note: A visual assessment is not considered an evaluation that requires a notification of lead hazard evaluation, since the assessment does not evaluate lead-based paint and/or lead hazards.

If the visual assessment reveals deteriorated paint, the award sub recipient should notify the owner of the unit with inspection results. The owner is required to have the deteriorated paint tested for lead based paint or to assume the presence of lead based paint is its stabilization activities.

Award sub recipient staff should instruct the owner to conduct paint stabilization before the unit is occupied to control possible lead-based paint hazards.

Owners must correct the deteriorated paint identified during the visual assessment process using safe work practices in order to participate in the long-term rental assistance program.

Nondiscrimination and Equal Opportunity Requirements

Subrecipients must comply with all applicable fair housing and civil rights requirements in 24 CFR 5.105(a). In addition, subrecipients must make known that ESG rental assistance and services are available to all on a nondiscriminatory basis and ensure that all citizens have equal access to information about ESG and equal access to the financial assistance and services provided under this program.

Persons who, as a result of national origin, do not speak English as their primary language and who have limited ability to speak, read, write, or understand English (“limited English proficient persons” or “LEP”) may be entitled to language assistance under Title VI in order to receive a particular service, benefit, or encounter. In accordance with Title VI of the Civil Rights Act of 1964 (Title VI) and its implementing regulations, the subrecipient agrees to take reasonable steps to ensure meaningful access to activities for LEP persons. Any of the following actions could

constitute “reasonable steps”, depending on the circumstances: acquiring translators to translate vital documents, advertisements, or notices, acquiring interpreters for face to face interviews with LEP persons, placing advertisements and notices in newspapers that serve LEP persons, partnering with other organizations that serve LEP populations to provide interpretation, translation, or dissemination of information regarding the project, hiring bilingual employees or volunteers for outreach and intake activities, contracting with a telephone line interpreter service, etc.

In addition, all notices and communications shall be provided in a manner that is effective for persons with hearing, visual, and other communication related disabilities consistent with section 504 of the Rehabilitation Act of 1973 and implementing regulations at 24 CFR 8.6. If the procedures that the subrecipient intends to use to make known the availability of the rental assistance and services are unlikely to reach persons of any particular race, color, religion, sex, age, national origin, familial status, or disability who may qualify for such rental assistance and services, the subrecipient must establish additional procedures that will ensure that such persons are made aware of the rental assistance and services.

Affirmatively Furthering Fair Housing

Under section 808(e) (5) of the Fair Housing Act, HUD has a statutory duty to affirmatively further fair housing. HUD requires the same of its funding recipients. Subrecipients will have a duty to affirmatively further fair housing opportunities for classes protected under the Fair Housing Act. Protected classes include race, color, national origin, religion, sex, disability, and familial status. Examples of affirmatively furthering fair housing include: (1) marketing the program to all eligible persons, including persons with disabilities and persons with limited English proficiency; (2) making buildings and communications that facilitate applications and service delivery accessible to persons with disabilities (see, for example, HUD’s rule on effective communications at 24 CFR 8.6); (3) providing fair housing counseling services or referrals to fair housing agencies; (4) informing participants of how to file a housing discrimination complaint, including providing the toll-free number for the Housing Discrimination Hotline: 1-800- 669-9777; and (5) recruiting landlords and service providers in areas that expand housing choice to program participants.

Lobbying and Disclosure Requirements

The disclosure requirements and prohibitions of section 319 of the Department of the Interior and Related Agencies Appropriations Act for Fiscal Year 1990 (31 U.S.C. 1352) (the Byrd Amendment), and implementing regulations at 24 CFR part 87, apply to ESG. Applicants must disclose, using Standard Form LLL (SF-LLL), “Disclosure of Lobbying Activities,” any funds, other than federally appropriated funds, that will be or have been used to influence federal employees, members of Congress, or congressional staff regarding specific grants or contracts.

Violence Against Women Reauthorization Act of 2013 (“VAWA”):

On November 16, 2016 the U.S. Department of Housing and Urban Development published the Violence Against Women Act (VAWA) final rule regarding housing protections for victims of domestic violence, dating violence, sexual assault, or stalking (Federal Register Document #2016-25888). This final rule prohibits an applicant for assistance or tenant assisted with ESG from being denied assistance under, denied admission to, terminated from participation in, or evicted from housing on the basis or as a direct result of the fact that the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault or stalking, so long as the applicant otherwise qualifies for admission, assistance, participation or occupation (24 CFR 5.2005 (b)(1)).

In addition, the VAWA Final Rule requires that each housing provider produce a detailed emergency transfer plan, which ensures that a tenant receiving rental assistance through or residing in a unit subsidized under an ESG housing program who is a victim of domestic violence, dating violence, sexual assault, or stalking qualifies for an emergency transfer within the criteria stated in 24 CFR 5.2005 (e)(2). All ESG housing providers must maintain records on emergency transfers requested under 24 CFR 5.2005(e). Data must include the outcomes of each request and must be provided to the NC ESG Office upon request.

All ESG RRH activities must provide applicants and participants the following HUD forms, or a comparable form developed by the LPA:

- HUD Form 5380
- HUD Form 5381
- HUD Form 5382
- HUD Form 5383

Rental assistance programs must provide copies of the HUD Forms to the property owner or manager at the time of lease-up and every re-certification as part of the lease renewal.

Any contract between the subrecipient and a Landlord must include:

- The requirement to comply with VAWA provisions in 24 CFR part 5, subpart L;
- A commitment from the Landlord to provide the HUD Forms 5380 and 5382 or comparable forms, to the program participant with any notification of eviction and comply with VAWA’s confidentiality requirements;
- The requirement on the Landlord to include
 - (1) a lease provision that includes all requirements that apply to tenants, the owner or the lease under VAWA, including the prohibited bases for eviction and restrictions on construing lease terms under 24 CFR 5.2005(b) and (c), and
 - (2) language in the lease that permits the program participant to terminate the lease, sublease or occupancy agreement without penalty if the program participant qualifies for an emergency transfer.

SECTION 16: PROCUREMENT

Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards set forth in 2 CFR 200 establishes standards and guidelines for the procurement of supplies, equipment, construction, and services to ensure that they are obtained as economically as possible through an open and competitive process, and that contracts are managed with good administrative practices and sound business judgment. The regulations include:

- Standards that prohibit conflicts of interest;
- Procedures for open competition with consistent technical solicitations;
- Affirmative efforts to hire minority- and women-owned enterprises;
- Maintenance of selection documentation; and
- Contract administration system that provides sufficient monitoring.

The guidelines on procurement are summarized as follows:

- Subrecipients are allowed to use their own procurement procedures as long as those procedures conform to the provisions of the regulations;
- Subrecipients must maintain a system to handle disputes, protests, and other matters arising out of its contracts; maintain a code of conduct to prevent conflicts of interest (personal, financial, and organizational); and use solicitations which are clear and accurately describe the materials, products, or services being procured
- Subrecipients must use some form of cost or price analysis in connection with each of its procurements. They must be able to justify procurements awarded on a non-competitive basis and justify the awarding of procurements by bid on the basis of other than the lowest bid.
- Subrecipients must initiate positive efforts to use small and minority-owned businesses to the maximum extent possible; include all applicable contract provisions in contracts; and not use the cost-plus-percentage of cost contracts.
- If the subrecipient has a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe, the subrecipient must also maintain written standards of conduct covering organizational conflicts of interest. Organizational conflicts of interest means that because of relationships with a parent company, affiliate, or subsidiary organization, the subrecipient is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization.
- The subrecipient's procedures must avoid acquisition of unnecessary or duplicative items. Consideration should be given to consolidating or breaking out procurements to obtain a more economical purchase. Where appropriate, an analysis will be made of lease versus purchase alternatives, and any other appropriate analysis to determine the most economical approach.

APPENDIX A: ESG RESOURCES

The HUD [ESG resources page](#) is the central hub for all ESG information, where you can access ESG-applicable laws, regulations, and notices, plus ESG Program guides, tools, and webinars. These are all excellent resources to help staff learn or better understand the program.

Key Concepts and Requirements

- [Eligible Activities for ESG Rapid Re-Housing and Homelessness Prevention Components](#)
- [Eligible Participants for ESG Rapid Re-Housing and Homelessness Prevention Components](#)
- [Requirements for Rental Assistance Agreements and Leases Under ESG](#)
- [ESG Requirements for Case Management to Help Ensure Housing Stability: Rapid Re-Housing and Homelessness Prevention Assistance](#)
- [Assigning Essential Services to the Appropriate Program Component](#)
- [Emergency Shelters: Distinguishing Between Renovation/Conversion and Maintenance Activities](#)
- [Using Contractors in the ESG and CoC Programs](#)

- [ESG Minimum Habitability Standards for Emergency Shelters and Permanent Housing](#)
- [ESG Rent Reasonableness and Fair Market Rent](#)
- [Applicable Requirements for Rental Assistance and Housing Relocation and Stabilization Services Matrix](#)

Eligibility and Documentation

Understanding the *homeless* and *at risk of homelessness* definitions can be challenging for some communities – especially when it comes to determining and documenting eligibility for ESG rapid re-housing and homelessness prevention assistance. It is critical that recipients and subrecipients are evaluating individuals and families for assistance correctly – not only for compliance purposes but also to ensure that ESG funds are being used to serve those most in need of assistance. The following materials can help providers correctly determine and document program participant eligibility:

- [At Risk Status and Income: Recordkeeping Requirements Webinar for ESG Grantees](#)
- [Homeless Status: Recordkeeping Requirements Webinar](#)
- [Determining Homeless and At-Risk Status, Income and Disability Webinar](#)
- [The Homeless Definition and Eligibility for SHP, SPC, and ESG](#)
- [Criteria and Recordkeeping Requirements for Definition of Homelessness](#)
- [Criteria for Definition of At Risk of Homelessness](#)
- [SNAPS-Shot: Eligible Participants for ESG Rapid Re-Housing and Homelessness Prevention Components](#)
- [Homeless Emergency Assistance and Rapid Transition to Housing \(HEARTH\): Defining "Chronically Homeless" Final Rule](#)

- [SNAPS In Focus: Final Rule on Defining "Chronically Homeless" Part II: Policy and Practical Implications of the New Definition](#)

Data Collection, Reporting, & Planning

There are multiple data collection and reporting systems that are relevant for ESG recipients and subrecipients, including the Homeless Management Information System (HMIS), and the Sage HMIS Reporting Repository (Sage). The following materials can help recipients and subrecipients understand these various data collection and reporting system requirements:

HMIS

- [ESG Program HMIS Manual](#)
- [CoC APR and ESG CAPER HMIS Programming Specifications](#)

Sage

- [Sage ESG CAPER Guidebook for ESG-funded Programs](#)
- [ESG CAPER: Sage HMIS Reporting Repository Template](#)
- [Sage Guidance for ESG Recipients Webinar](#)
- [Sage Guidance for ESG Subrecipients Webinar](#)

Important Cross-Cutting Concepts

Some cross-cutting programmatic practices are required by the ESG regulations, such as consultation with Continuums of Care (CoCs) and participation in coordinated entry. HUD strongly encourages recipients and subrecipients to adopt other key program elements, such as emphasizing rapid re-housing, implementing a low-barrier approach to emergency shelter, and using a Housing First model. While not all are ESG Program-specific, the following resources can assist recipients and subrecipients to understand and incorporate these important practices into their communities' efforts to end homelessness:

- [SNAPS In Focus: Rapid Re-Housing As a Model and Best Practice](#)
- [HUD and USICH: Core Principles of Housing First and Rapid Re-Housing Webinar](#)
- [Coordinated Entry Policy Brief](#)
- [Coordinated Entry Requirements and Checklist of Essential Elements](#)
- [SNAPS In Focus: Improving our Crisis Response System](#)
- [Coordination and Collaboration for CoCs and Con Plan Jurisdictions Guide and Video](#)
- [Emergency Solutions Grants State Recipient Consultation with Continuums of Care](#)
- [FY 2016 CoC-Con Plan Jurisdiction and ESG Recipient Crosswalk](#)
- [Disaster Recovery Homelessness Toolkit](#)
- [Disease Risks and Homelessness](#)

ESG FAQs

Through the publication of Frequently Asked Questions (FAQs), HUD offers clarifying information and guidance that may not be stated as explicitly elsewhere. All ESG Program FAQs are available on the [ESG Program FAQs](#) page.

APPENDIX B: NC ESG FORMS

[NC ESG Client File Form Link](#)

[NC ESG Requisition Forms Link](#)

APPENDIX C: REQUIRED DATA ELEMENTS & SERVICE TRANSACTION CODES

Required Universal Data Elements (UDEs) by Project Type

Data Element	Project Type				
	Shelter-Entry/Exit	Shelter-Night by Night	Homeless Prevention	Rapid Rehousing	Street Outreach
Universal Data Elements					
Name	✓	✓	✓	✓	✓
Social Security Number	✓	✓	✓	✓	✓
Date of Birth	✓	✓	✓	✓	✓
Race	✓	✓	✓	✓	✓
Ethnicity	✓	✓	✓	✓	✓
Gender	✓	✓	✓	✓	✓
Veteran Status	✓	✓	✓	✓	✓
Disabling Condition	✓	✓	✓	✓	✓
Living Situation - Part A	✓	✓			✓
Living Situation - Part B			✓	✓	
Project Entry Date	✓	✓	✓	✓	✓
Project Exit Date	✓	✓	✓	✓	✓
Destination	✓	✓	✓	✓	✓
Personal ID	✓	✓	✓	✓	✓
Household ID	✓	✓	✓	✓	✓
Relationship to Head of Household	✓	✓	✓	✓	✓
Client Location	✓	✓	✓	✓	✓

Required Project Specific Data Elements by Project Type Continued

Data Element Project Specific Data Elements	Project Type				
	Shelter- Entry/Exit	Shelter- Night by Night	Homeless Prevention	Rapid Rehousing	Street Outreach
Income and Sources	✓		✓	✓	✓
Non-Cash Benefits	✓		✓	✓	✓
Health Insurance	✓		✓	✓	✓
Physical Disability	✓	✓	✓	✓	✓
Developmental Disability	✓	✓	✓	✓	✓
Chronic Health Condition	✓	✓	✓	✓	✓
HIV/AIDS	✓	✓	✓	✓	✓
Mental Health Problem	✓	✓	✓	✓	✓
Substance Abuse	✓	✓	✓	✓	✓
Domestic Violence / Victim Service Provider Contact	✓	✓	✓	✓	✓
Date of Engagement		✓			✓
Bed-Night Date		✓			
Housing Move-in Date				✓	
Housing Assessment at Exit			✓		

Required Service Transactions by Project Type

Emergency Shelter		
Eligible Expense	Service Transaction Term	Service Transaction Code
Case Management	Case/Care Management	PH-1000
Child Care	Child Care Expense Assistance	NL-3000.1500
Employment Assistance and Job Training	Employment Preparation	ND-2000
Legal Representation; Legal Services	Legal Services	FT
Substance Abuse Treatment Services	Substance Use Disorder Services	RX
Emergency Health Services; Outpatient Health Services	Health Care	L
Transportation	Transportation	BT
Homeless Prevention		
Eligible Expense	Service Transaction Term	Service Transaction Code
Case Management	Case/Care Management	PH-1000
Mediation	Mediation	FP-0700-5000
Housing Search and Placement	Housing Search Assistance	BH-3900.3100
Moving Costs	Moving Assistance	BH-5000
Rental Application Fees	Rental Application Fee Payment Assistance	BH-3800.7200
Security Deposit	Rental Deposit Assistance	BH-3800.7250
Short/Medium Rental Assistance	Rental Payment Assistance	BH-3800.7000
Utility Deposit	Utility Deposit Assistance	BV-8900.9150
Utility Payments	Utility Service Payment Assistance	BV-8900.9300
Payment of Rental Arrears	Rental Payment Assistance	BH-3800.7000
Street Outreach		
Eligible Expense	Service Transaction Term	Service Transaction Code
Case Management	Case/Care Management	PH-1000
Emergency Health Services; Outpatient Health Services	Health Care	L
(Emergency) Mental Health Services	Mental Health Supportive Services	RR
Transportation	Transportation	BT
Rapid Rehousing		
Eligible Expense	Service Transaction Term	Service Transaction Code
Case Management	Case/Care Management	PH-1000
Credit Repair	Credit Counseling	DM-1500.1500
Moving Costs	Moving Assistance	BH-5000
Rental Application Fees	Rental Application Fee Payment Assistance	BH-3800.7200
Security Deposit	Rental Deposit Assistance	BH-3800.7250
Short/Medium Rental Assistance	Rental Payment Assistance	BH-3800.7000
Utility Deposit	Utility Deposit Assistance	BV-8900.9150

Utility Payments	Utility Service Payment Assistance	BV-8900.9300
Housing Search and Placement	Housing Search Assistance	BH-3900.3100
(Emergency) Mental Health Services	Mental Health Supportive Services	RR
Payment of Rental Arrears	Rental Payment Assistance	BH-3800.7000

APPENDIX D: NC ESG QUARTERLY PERFORMANCE REPORT DATA SOURCES

The following charts indicate which HMIS reports should be used to complete the ESG Quarterly Performance Reports. Where applicable, the question to refer to on the report is noted as “Q”.

Data Quality- All projects	
Item	Source
Personally Identifiable Information- Overall Score	0640 HUD Data Quality Report (Q2)
Universal Data Elements	0640 HUD Data Quality Report (Q3)
Chronic Homelessness	0640 HUD Data Quality Report (Q5)
Timeliness	0640 HUD Data Quality Report (Q6)

Number Served and Demographics- All projects	
Item	Source
Report Validation Table	CAPER V5 (Q5a)
Living Situation	CAPER V5 (Q15)

Utilization- Emergency Shelter	
Item	Source
Utilization Rate	Bed and Unit Utilization by Provider

Impact- Emergency Shelter	
Item	Source
Length of Stay in Project	0700 Length of Time Homeless
Exit Destinations- All persons	CAPER V5 (Q 23c)

Impact- Street Outreach	
Item	Source
Length of Stay in Project	NC ESG Length of Stay Report
Exit Destinations- All persons	CAPER V5 (Q 23c)
Total Persons Contacted- 1 st contact at place not meant...	CAPER V5 (Q 9a)
Rate of Engagement- 1 st contact at place not meant...	CAPER V5 (Q 9b)

Impact- Homeless Prevention	
Item	Source
Length of Stay in Project	NC ESG Length of Stay Report
Exit Destinations- All persons	CAPER V5 (Q23c)
Homeless Prevention Housing Assessment at Exit	CAPER V5 (Q24)

Impact- Rapid Rehousing	
Item	Source
Length of Stay in Project	NC ESG Length of Stay Report
Length of Time between Project Start Date and Housing Move-in Date	CAPER V5 (Q 22c)
Exit Destinations- All persons	CAPER V5 (Q 23c)