

ESG Client File Checklist / HOMELESSNESS PREVENTION



Client Name _____ HMIS / Comparable Database # _____

Entry Date _____ Exit Date _____

1. _____ **Documentation of program enrollment in HMIS** or comparable database 24 CFR 576.400(f)
Provide a screenshot of the client's enrollment in the program, with entry and exit dates.

2. _____ **Intake form/Initial Assessment** identifying client's most pressing needs 24 CFR 576.401(a)
All of the following must be explained/provided to client at project entry.
 - Grievance & Termination Policy
 - Program rules
 - Right to Fair Housing
 - Releases of Information for HMIS and other entities on behalf of participant
 - "Protect Your Family from Lead in Your Home" pamphlet
 - "Notice of Occupancy Rights under the Violence Against Women Act" HUD Form 5380

3. _____ **ESG Verification of Homeless Status Form** with supporting documentation
Must follow documentation requirements outlined in 24 CFR 576.103 & 24 CFR 576.500 (b) & (c)
 - At-Risk of Homelessness
 - Imminent risk of homelessness (Category 2 Homeless)
 - Homeless under other federal statues (Category 3 Homeless)
 - Fleeing/attempting to flee domestic violence (Category 4 Homeless)

4. _____ **Documentation that participant is at or below 30% AMI at program entry** 24 CFR 576.500(e) & 24 CFR 576.401(c)
 - ESG Income & Asset Calculation Worksheet **AND**
 - Source documentation

*Include the following **ONLY IF** source documents are unavailable:*

 - ESG Third-Party Verification of Income **AND**
 - ESG Self-Certification of Income Form

5. _____ **Record of ESG services provided** while in HP program 24 CFR 576.105, 24 CFR 576.106, 24 CFR 576.500(l)

<u>Financial Assistance</u>	<u>Rental Assistance</u>	<u>Stabilization Services</u>
<input type="checkbox"/> Rental application fees	<input type="checkbox"/> Short-term Rental Assistance	<input type="checkbox"/> Housing search and placement
<input type="checkbox"/> Security deposit	<input type="checkbox"/> Medium-term Rental Assistance	<input type="checkbox"/> Housing stability case management
<input type="checkbox"/> Last month's rent	<input type="checkbox"/> Rental arrears	<input type="checkbox"/> Mediation
<input type="checkbox"/> Utility deposits/payments		<input type="checkbox"/> Legal services
<input type="checkbox"/> Moving costs		<input type="checkbox"/> Credit repair

6. _____ **Documentation of referral and connection** to homeless and mainstream services 24 CFR 576.401(d)
Must show that the referral/connection(s) occurred while the client was in the program. Referral Tracking Tool can be found on THDA's ESG website.

7. _____ **Case notes documenting case management meetings**, at least monthly 24 CFR 576.401(e)(1)(i)

8. _____ **Evidence of continued eligibility** of participant shows an evaluation at least once every three months while the participant is in the program. Agency may require re-evaluation when a relevant change to participant's income or circumstances has occurred. Time starts at program entry. Income may not exceed 30% AMI. *24 CFR 576.401(b)*

Re-evaluation date	
Re-evaluation date	
Re-evaluation date	

- ESG Statement of Insufficient Resources **AND**
- ESG Income & Asset Calculation Worksheet with source documentation

*Include the following **ONLY IF** source documents are unavailable:*

- ESG Third-Party Verification of Income **AND**
- ESG Self-Certification of Income

9. _____ **ESG Financial Tracking Form** listing all payments made towards housing stability, supportive services or supplies to promote housing stability for the participant. *24 CFR 576.500(f)* Financial Tracking Form includes, date paid, check number, vendor/ payee, eligible expense type, amount paid by ESG. Optional example can be found on the THDA website.

10. _____ Documentation of provision of **Termination Procedure** Include possible reasons for termination, the procedure for if/when a client is terminated from the program, and the appeal process. *24 CFR 576.500(f)(3) & 24 CFR 576.402*

Was the client terminated from the program? Yes No

If yes, provide documentation related to the termination proceeding. Review 24 CFR 576.402

Were any Stabilization Services provided to the client? *This excludes service delivery costs of the Homelessness Prevention program and is just to include Stabilization Costs specific to the participant. Examples would include admission to a credit repair class, budgeting class, hourly fees for legal services or mediation services. 24 CFR 576.105(b)*

- Yes, with ESG Yes, without ESG No Stabilization Services were provided

If ESG was used to provide Stabilization Services, the following requirements apply:

1. _____ **Payment documentation of all Stabilization Services provided with supporting documentation.**
Costs recorded on Financial Tracking Sheet & includes invoices and proof of payments for all services provided to the participant. *May include documentation that lawyers used are licensed and in good standing with the bar association, invoices from credit repair class, budgeting class, or mediation service.*
2. _____ **Maximum Amounts & Periods of Assistance do not exceed 24 months in a 3-year period.**
Check HMIS or comparable database for other assistance. This can be documented by a case note from the case manager or self-certification from the participant. Financial Tracking Sheet will show that periods of assistance are not exceeded while in the program. *24 CFR 576.105(c) & 576.106(a)*

Was any Financial Assistance provided to the participant? *Financial Assistance includes – Rental Application Fees, Security Deposits, Utility Deposits, Utility Payments, Moving Costs and Last Month’s Rent. 24 CFR 576.105(a)*

- Yes, with ESG Yes, without ESG No Financial Assistance was provided

If ESG was used to provide Financial Assistance the following requirements apply:

1. _____ **Minimum Habitability Standards** checklist 24 CFR 576.403(c)
2. _____ **Lead Paint Disclosure Form**, including provision of Lead Safety Pamphlet 24 CFR 576.403(a)
 - N/A: unit built after 1978
 - N/A: no child under 6 or pregnant woman was/will be in residence
3. _____ **Maximum Amounts & Periods of Assistance do not exceed 24 months in a 3-year period.**
24 CFR 576.105(c) & 24 CFR 576.106(a)
4. _____ **Participant is not using any other subsidies** or another ESG program for assistance with housing – record case manager’s due diligence in checking this provision in case note 24 CFR 576.106(c)
5. _____ **Payment documentation of Financial Assistance with supporting documentation.**
Supporting documentation may include lease agreements, utility bills, invoices for moving expenses, or invoices for rental application fees. Include proof of payment documentation (check stubs, payment confirmation, etc.) that contains payment dates, payment amounts, and types of expenses.

Was any Rental Assistance provided to the client? *This includes short-term & medium-term rental assistance and rental arrears.*

- Yes, with ESG Yes, without ESG funds No rental assistance was provided

If ESG was used to provide Rental Assistance, the following requirements apply 24 CFR 576.500(h):

1. _____ A copy of the **lease agreement** covering the dates of rental assistance provided 24 CFR 576.106(g)
2. _____ **VAWA lease addendum** (HUD form 91067). 24 CFR 576.500(h)
 - A separate form is not required if the information is provided in the original lease agreement
3. _____ Documentation of provision of **VAWA Protections**. Forms can be found on www.hud.gov/vawa (24 CFR 576.409(c))
 - **Notice of Occupancy Rights (HUD form 5380)** must be provided when rental assistance begins AND when client is notified of termination of rental assistance and/or notified of eviction
 - **Certification form to document an incident (HUD form 5382)** must be provided when client is notified of termination of rental assistance and/or notified of eviction
4. _____ Documentation of unit compliance with **Rent Reasonableness** 24 CFR 576.106(d)(1)
5. _____ Documentation of unit compliance with **Fair Market Rent** 24 CFR 576.106(d)(1)
 - N/A: used HUD-approved FMR waiver for the area _____
6. _____ **Minimum Habitability Standards** checklist 24 CFR 576.403 (c)

7. _____ **Lead Paint Disclosure Form**, including provision of Lead Safety Pamphlet (24 CFR 576.403(a))
 - N/A: unit built after 1978
 - N/A: no child under 6 or pregnant woman was/will be in residence
8. _____ **Rental Assistance Agreement** between agency and landlord outlining the terms of the assistance
24 CFR 576.106(e), 24 CFR 576.500(h), 24 CFR 576.409(a)
9. _____ **Participant is not using any other subsidies** or another ESG program for assistance with housing – record case manager’s due diligence in checking this provision in case note *24 CFR 576.106(c)*
 - N/A: In the case where Rental Assistance is solely for Rental Arrears on a unit where the participant is receiving another subsidy for rent
10. _____ **Documentation of rental assistance payments, along with supporting documentation** *Include payment documentation (e.g. fiscal ledger, check stubs, etc.) that contains payment dates, payment amounts, types of expenses, and dates of occupancy. Supporting documentation may be leases or invoices from the landlord. 24 CFR 576.500(h)*
11. _____ **Maximum Amounts & Periods of Assistance do not exceed 24 months in a 3-year period.**
(24 CFR 576.105(c) & 576.106(a))

Notes



ABOUT THIS RESOURCE

This matrix is designed to provide ESG recipients and subrecipients with a quick reference for assessing which ESG standards apply when providing rental assistance or housing relocation and stabilization services under the Rapid Re-Housing or Homelessness Prevention components of the ESG program. Recipients and subrecipients should always refer to the program regulations to ensure that they are in compliance with all requirements.

Standard	Rental Assistance	Housing Relocation and Stabilization Services	
		Financial Assistance	Services
Fair Market Rent <i>24 CFR 576.106(d)</i>	X		
Rent Reasonableness <i>24 CFR 576.106(d)</i>	X		
Housing Standards <i>24 CFR 576.403(c)</i>	X	X	X
Lead-based paint requirements <i>24 CFR 576.403(a)</i>	X	X	X ¹
Lease between the program participant and landlord <i>24 CFR 576.106(g)</i>	X		
Rental assistance agreement between the landlord and recipient or subrecipient <i>24 CFR 576.106(e)</i>	X		
Maximum Amounts and Periods of Assistance (24-month cap in 3-year period) <i>24 CFR 576.105(c) & 576.106(a)</i>	X	X	X ²
Participation in HMIS³ <i>24 CFR 576.400(f)</i>	X	X	X
Prohibition of use with other subsidies <i>24 CFR 576.104(d) & 576.106(c)</i>	X ⁴	X	
Recordkeeping and Reporting Requirements <i>24 CFR 576.500</i>	X	X	X

¹ When providing *homelessness prevention services only* assistance – housing search and placement, housing stability case management, mediation, legal services, and credit repair – to keep a program participant *in the same unit*, a lead-based paint assessment is not required.

² Housing stability case management services cannot exceed 30 days during the period the program participant is seeking permanent housing. In addition, these services cannot exceed 24 months, not including the previous 30 days, during the period the program participant is living in permanent housing (*24 CFR 576.105(b)(2)*).

³ Excludes victim service providers and legal service providers, which must maintain a comparable database.

⁴ A one-time payment of rental arrears of the tenant’s portion of the rental payment is permitted while the program participant is receiving another subsidy for rent.

The following chart provides a list of the eligible activities under each category of assistance, within the

Rapid Re-Housing and Homelessness Prevention components.

Rapid Re-Housing and Homelessness Prevention Components		
Rental Assistance ^o	Housing Relocation and Stabilization Services	
	Financial Assistance	Services Costs
<p><u>Eligible activity types:</u></p> <ul style="list-style-type: none"> • Short-term rental assistance • Medium-term rental assistance • Rental arrears <p>^oRental assistance can be project-based or tenant-based.</p>	<p><u>Eligible activity types:</u></p> <ul style="list-style-type: none"> • Rental Application Fees • Security Deposits • Last Month’s Rent • Utility Deposits • Utility Payments • Moving Costs 	<p><u>Eligible activity types:</u></p> <ul style="list-style-type: none"> • Housing Search and Placement • Housing Stability Case Management • Mediation • Legal Services • Credit Repair