

Section 5

Emergency Solutions Grant Program Policies



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These policies supersede any previously adopted policies and are subject to review and revision by the City of Modesto's Citizens Housing and Community Development



City of Modesto Emergency Solutions Grant Policies

1.0 APPLICABLE LAWS AND REGULATIONS

1.1 The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act revised the Emergency Shelter Grants program and renamed it the Emergency Solutions Grants (ESG) program. The HEARTH Act broadened the emergency shelter and homelessness prevention activities of the Emergency Solutions Grants program beyond those of its predecessor program, the Emergency Shelter Grants program, and added short- and medium-term rental assistance and services to rapidly re-house persons experiencing homelessness. The change in the program's name reflects the change in the program's focus from addressing the needs of homeless people in emergency or transitional shelters to assisting people to quickly regain stability in permanent housing after experiencing a housing crisis or becoming homeless.

1.1.1 The ESG program awards funds, on a formula basis, to state governments, metropolitan cities, urban counties, and U.S. territories for five components, plus Administrative activities:

- 1.1.1.1 Street Outreach;
- 1.1.1.2 Emergency Shelter;
- 1.1.1.3 Rapid Re-housing;
- 1.1.1.4 Homelessness Prevention; and
- 1.1.1.5 Homeless Management Information System (HMIS).

1.1.2 ESG funds are available for the following purposes:

- 1.1.2.1 Engage homeless individuals and families living on the street;
- 1.1.2.2 Improve the number and quality of emergency shelters for homeless individuals and families;
- 1.1.2.3 Help operate these shelters;
- 1.1.2.4 Provide essential services to shelter residents;
- 1.1.2.5 Rapidly re-house homeless individuals and families; and
- 1.1.2.6 Prevent families/individuals from becoming homeless.

1.1.3 Territories and local governments that receive ESG funds may carry out the program directly and/or subgrant all or part of their ESG funds to private nonprofit organizations to carry out eligible program activities. States receiving ESG funds must subgrant all of the ESG funds they receive, except for their allowable portion of the grant for administration costs, and HMIS costs if the recipient is the HMIS lead, to units of general purpose local government and/or private nonprofit organizations to carry out the program.

1.1.4 Emergency Solutions Grants are governed by following code of federal regulations: 24 CFR 576.400(a); 24 CFR 576.500(a); 24 CFR 576.400(e)(3); 24 CFR 576.401(a), (b), and (c); 24 CFR

576.500(a), (b), (c), and (e); 24 CFR 576.405(a); 24 CFR 576.405(b); 24 CFR 576.500(q); 24 CFR 576.406(e); 24 CFR 576.500(r); 24 CFR 576.406(e); 24 CFR 576.500(r).

1.2 HOMELESS DEFINITIONS

- 1.2.1 For program participants who qualified as homeless because their primary nighttime residence was a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground, or because they were living in a supervised shelter designed to provide temporary living arrangements. [24 CFR 576.500(b)(1)]
- 1.2.2 For program participants who qualified as homeless because they were exiting an institution where they resided for 90 days or less and had resided in an emergency shelter or place not meant for human habitation immediately before entering that institution. [24 CFR 576.500(b)(2)]
- 1.2.3 For program participants who qualified as homeless because they were exiting an institution where they resided for 90 days or less and had resided in an emergency shelter or place not meant for human habitation immediately before entering that institution, immediately prior to entering the institution. [24 CFR 576.500(b)(2)]
- 1.2.4 For program participants who qualified under paragraph (2) of the homeless definition in 24 CFR 576.2, would they have lost their primary nighttime residence (including housing they own, rent, or share with others) within 14 days of the date of application for homeless assistance. [24 CFR 576.500(b)(3)(i)]
- 1.2.5 For youth and families who qualified under paragraph (3) of the homeless definition in 24 CFR 576.2, confirm that the unaccompanied youth or family with children and youth met the homeless definition of another federal statute as evidenced by a certification of homeless status signed by the local private nonprofit organization or state or local governmental entity responsible for administering assistance under that statute. [24 CFR 576.500(b)(4)(i)]
- 1.2.6 For youth and families who qualified under paragraph (3) of the homeless definition in 24 CFR 576.2, confirm that the program participants did not have a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance. [24 CFR 576.500(b)(4)(ii)]
- 1.2.7 For youth and families who qualified under paragraph (3) of the homeless definition in 24 CFR 576.2, with indication that each program participant's records contain a written self-certification that the program participant moved two or more times during the 60-day period immediately before the program participant applied for homeless assistance AND one or more of the following documentation, as applicable, to support the self-

certification. [24 CFR 576.500(b)(4)(iii)]

- 1.2.8 For youth and families who qualified under paragraph (3) of the homeless definition in 24 CFR 576.2, confirming program participants' persistent instability was likely to continue for an extended period of time because of: chronic disabilities; chronic physical health or mental health conditions; substance addiction; histories of domestic violence or dating violence or childhood abuse; the presence of a child or youth with a disability; two or more barriers to employment (including lack of high school degree or GED; illiteracy; low English proficiency; a history of incarceration; or detention for criminal activity; and/or a history of unstable employment). [24 CFR 576.500(b)(4)(iv)]
- 1.2.9 Where the program participant qualifies under paragraph (4) of the definition of homeless in 24 CFR 576.2 and was served by a victim service provider. [24 CFR 576.500(b)(5)]
- 1.2.10 Where the program participant qualified under paragraph (4) of the definition of homeless in 24 CFR 576.2 and was served by an organization that is not a victim service provider, do the records contain the required documentation and support for the program participant's oral statement that the individual or family:
 - 1.2.10.1 Was fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence;
 - 1.2.10.2 Lacked the resources or support networks needed to obtain other permanent housing; and
 - 1.2.10.3 Had no other subsequent residence identified. [24 CFR 576.500(b)(5)]
- 1.2.11 Where the program participant qualified as at-risk of homelessness under paragraph (1) of the definition in 24 CFR 576.2, reflecting that the household's income is below 30 percent of the area median income, as evidenced by an income evaluation form containing HUD's minimum requirements. [24 CFR 576.500(c)(1)(i); 24 CFR 576.500(e)]
- 1.2.12 Where the program participant qualified as at-risk of homelessness under paragraph (1) of the definition in 24 CFR 576.2, with the program participant's written certification that the program participant has insufficient financial resources and support networks immediately available to attain housing stability and meets one or more of the conditions under paragraph (1)(iii) of the "at risk of homelessness" definition[24 CFR 576.500(c)(1)(ii)]
- 1.2.13 Where the program participant qualified as at-risk of homelessness under paragraph (1) of the definition in 24 CFR 576.2, with records showing reasonable efforts to verify that the program participant did not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place. [24 CFR 576.500(c)(1)(iii)]

- 1.2.14 Where the program participant qualified as at-risk of homelessness under paragraph (1) of the definition in 24 CFR 576.2, with records showing reasonable efforts to verify that the program participant met one of the seven conditions under paragraph (1)(iii). [24 CFR 576.500(c)(1)(iv)]
- 1.2.15 Where the program participant qualified as at-risk of homelessness under paragraph (2) in 24 CFR 576.2, with records reflecting that the program participant met the definition of homeless under one of the following federal statutes, as evidenced by a certification of the child or youth's homeless status by the agency or organization responsible for administering assistance under the statute. [24 CFR 576.500(c)(2)]
- 1.2.16 Where the program participant qualified as at-risk of homelessness under paragraph (3) in 24 CFR 576.2, with records reflecting that the child or youth in the household qualified as homeless under subtitle B of title VII of the McKinney-Vento Homeless Assistance Act, as evidenced by certification of the child or youth's homeless status by an agency or organization that administers assistance under the Education for Homeless Children and Youth Program.
 - 1.2.16.1 Under this paragraph of At-Risk of Homelessness, the certification need only specify that the child or youth meets the definition under subtitle B of title VII of the McKinney-Vento Homeless Assistance Act. [24 CFR 576.500(c)(2)]

2.0 CONSULTATION WITH CONTINUUM OF CARE

- 2.1 Coordination with Other Targeted Homeless Services: The City of Modesto will annually confirm that each subrecipient's records reflect that it coordinated and integrated, to the maximum extent practicable, ESG-funded activities with the programs, including those listed under 24 CFR 576.400(b), that are targeted to homeless people in the area covered by the Continuum of Care (CoC) or area over which the services are coordinated to provide a strategic, community-wide system to prevent and end homelessness for that area. [24 CFR 576.400(b); 24 CFR 576.500(m)]
- 2.2 System and Program Coordination with Mainstream Resources: The City of Modesto will annually confirm subrecipient's records reflect that it coordinated and integrated, to the maximum extent practicable, ESG-funded activities with mainstream housing, health, social services, employment, education, and youth programs for which homeless and at-risk persons might be eligible. [24 CFR 576.400(c); 24 CFR 576.500(m)]
- 2.3 Use of the Coordinated Assessment System: If the CoC for the area in which the program or project is located has established a coordinated assessment system that meets HUD's requirements, the City of Modesto will confirm their records show:
 - 2.3.1 That the subrecipient (unless it is a victim service provider) uses that assessment system; and
 - 2.3.2 All initial evaluations were conducted in accordance with the coordinated assessment system requirements.

2.3.3 ESG-funded victim service providers may choose not to use the CoC's coordinated assessment system. [24 CFR 576.400(d); 24 CFR 576.401(a); 24 CFR 576.500(g)]

2.4 Coordinated Assessment (Consistency with Written Standards): The City of Modesto will confirm each subrecipient works with the CoC to ensure that the screening, assessment, and referral of program participants are consistent with the ESG written standards required under 24 CFR 576.400(e) [24 CFR 576.400(d)]

3.0 RECORDKEEPING (RECORD RETENTION)

3.1 Recordkeeping (Subrecipients): If applicable, the City of Modesto will confirm the subrecipient retains copies of all solicitations of and agreements with its subrecipients; including records of all payment requests by and dates of payments made to subrecipients, and documentation of all monitoring and sanctions of subrecipients. [24 CFR 576.500(v)]

3.2 Recordkeeping (Contractors): If a subrecipient procured goods and services, the City of Modesto records will reflect that it did so in compliance with the Uniform Administrative Requirements, including the codes of conduct and conflict of interest requirements, and did the subrecipient retain copies of all procurement contracts [24 CFR 576.404(b); 24 CFR 84.40 – 84.48; 24 CFR 85.36 and 24 CFR 576.500(v)]

4.0 RECORDKEEPING (PROGRAM PARTICIPANT ELIGIBILITY)

4.1 Recordkeeping (Eligibility): Annually, the City of Modesto confirms each subrecipient's records document that staff followed the recipient's policies and procedures to:

4.1.1 Conduct an initial evaluation and re-evaluations as required, and

4.1.2 Document eligibility in accordance with HUD's requirements. [24 CFR 576.400(e)(3); 24 CFR 576.401(a), (b), and (c); 24 CFR 576.500(a), (b), (c), and (e)]

4.2 Recordkeeping (Program Participant Records): Annually, the City of Modesto reviews subrecipient records ensure that each program participant documents are in compliance with applicable requirements for providing services and assistance to that program participant under the program components and eligible activities provisions at 24 CFR 576.101 through 24 CFR 576.106. [24 CFR 576.500(f)]

4.3 Confidentiality: Annually, the City of Modesto confirms each subrecipient has written procedures to ensure confidentiality, including:

4.3.1 All records containing personally identifying information of any individual or family who applies for and/or receives ESG assistance are kept secure and confidential;

4.3.2 The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under ESG; and

4.3.3 The address or location of any program participant housing. [24 CFR 576.500(x)]

4.4 Recordkeeping (Record Retention): Annually, the City of Modesto confirms its subrecipients retain copies of the required records for the greater of 5 years or the applicable time period below:

- 4.4.1 for emergency shelters subject to a 10-year minimum period of use: at least 10 years from the date that ESG funds were first obligated for the major rehabilitation or conversion of the building; or
- 4.4.2 for program participant files: at least 5 years after the expenditure of all funds from the grant under which the program participant was served. [24 CFR 576.500(y)]

5.0 HOMELESS PARTICIPATION (LOCAL GOVERNMENTS)

5.1 The City of Modesto will confirm each subrecipient involves homeless individuals and families, to the maximum extent practicable, in constructing, renovating, maintaining, and operating facilities assisted under ESG, in providing services assisted under ESG, and in providing services for occupants of facilities assisted under ESG (could include employment or volunteer services). [24 CFR 576.405(c)]

6.0 NON-DISCRIMINATION AND OTHER FEDERAL REQUIREMENTS

- 6.1 Drug-Free Workplace: The City of Modesto will confirm each subrecipient has a drug-free workplace statement per the requirements of 2 CFR part 2429. [24 CFR 5.105(d) and 24 CFR 576.407(a)]
- 6.2 Non-Discrimination, Section 504 of the Rehabilitation Act of 1973, and Other Equal Opportunity Requirements: City of Modesto records demonstrate that each subrecipient is in compliance with the applicable requirements in 24 CFR part 5, Subpart A, including the nondiscrimination and equal opportunity requirements at 24 CFR part 5.105(a). [24 CFR part 5, Subpart A; 24 CFR 576.407(a); 24 CFR 576.500(s)(1)]
- 6.3 Affirmative Outreach: The City of Modesto and its subrecipients shall:
 - 6.3.1 Make known that the use of the facilities, assistance, and services are available to all on a nondiscriminatory basis, and establish additional procedures, as required under 24 CFR 576.407(b), to ensure that the “target population” who may qualify are made aware of the availability of these facilities, assistance, or services; and
 - 6.3.2 Take appropriate steps to ensure effective communication with persons with disabilities; and
 - 6.3.3 Take reasonable steps to ensure meaningful access to programs and activities for limited English proficiency persons [24 CFR part 5, Subpart A; 24 CFR 576.407(b); 24 CFR 576.500(s)(1)]
- 6.4 Applicability of Uniform Administrative Requirements and OMB Circulars: When reviewed the City of Modesto must ensure that each subrecipient maintain records documenting compliance with the applicable requirements outlined in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. [24 CFR 576.407(c); 24 CFR 576.500(s)(2)]
- 6.5 Audits: When reviewed, the City of Modesto must ensure that each subrecipient is in compliance with the Single Audit Act of 1984, as amended, and implementing regulations. [24 CFR 84.26; 24 CFR 85.26; 24 CFR 576.407(c)]

6.6 Section 3: When reviewed, the City of Modesto must make sure that each subrecipient in compliance with the applicable requirements of Section 3 of the Housing and Urban Development Act of 1968. [24 CFR part 135; 24 CFR 576.407(a); 24 CFR 576.405(c)];

7.0 FAITH-BASED ACTIVITIES (REHABILITATION)

7.1 The City of Modesto must ensure each subrecipient does not engage in inherently religious activities as part of the programs or services funded under ESG. If the subrecipient conducted these activities, were they offered separately, in time or location, from the programs or services funded under ESG, and was participation voluntary for all program participants. [24 CFR 576.406(b); 24 CFR 576.500(r)]

7.2 The City of Modesto must ensure that it did not discriminate against a program participant or prospective program participant on the basis of religion or religious belief. [24 CFR 576.406(d); 24 CFR 576.500(r)]

7.3 Annually, the City of Modesto will ensure each subrecipient does not use ESG funds for the rehabilitation of sanctuaries, chapels, or other rooms that an ESG-funded religious congregation uses as its principal place of worship. [24 CFR 576.406(e); 24 CFR 576.500(r)]

7.4 When a structure is used for both eligible and inherently religious activities, the City of Modesto ensures that the amount of ESG funds used was limited to the costs of those portions of the rehabilitation that are attributable to eligible activities in accordance with the cost accounting requirements applicable to ESG funds. [24 CFR 576.406(e); 24 CFR 576.500(r)]

8.0 MONITORING AND FINANCIAL MANAGEMENT AND COST ALLOWABILITY:

8.1 The City of Modesto (the recipient) and its subrecipients must have written policies and procedures to ensure that ESG funds are used in accordance with ESG requirements and sufficient records to enable HUD and the recipient to determine whether ESG requirements are being met. [24 CFR 576.500(a)]

8.2 As the lead agency for ESG funds, the City of Modesto will monitor all subrecipients on a regular basis through written contacts, phone conversations, electronic information transfers, face-to-face monitoring visits (at least once annually), and project file review, pursuant to applicable regulation.

8.3 Monitoring will be conducted to ensure statutory and regulatory requirements are being met and that information submitted to City of Modesto is accurate and complete.

8.4 Monitoring will normally be conducted utilizing a three (3) tiered approach, depending upon the risk involved:

8.4.1 Limited Review

8.4.1.1 A limited review will be conducted of all subrecipients and projects on an

annual basis. The timing of this monitoring will be in alignment with an organization's submittal of a Quarterly Performance Report and an Invoice for Payment for expenses incurred against their City grant over the previous 90 days.

8.4.1.2 At least one quarter review will focus on the year-end financial statement or audit, and where applicable, the Single Audit. If the Single Audit contains audit findings or contains a management letter, the subrecipient will be selected for an In Depth Review (see Section 8.4.3). The goal of a Limited Review is to provide clarification to a specific unknown submission that cannot be determined from the subrecipient reports, and to identify areas of technical assistance needed by each subrecipient.

8.4.2 On-Site Monitoring Review

8.4.2.1 An on-site monitoring review will be a site visit to a subrecipient program assisted with HUD funds and will achieve a balance between programmatic and fiscal reviews, and much documentation review can be done prior to the on-site visit. The on-site monitoring includes a tour of the program facilities as appropriate, an explanation of the services provided, discussions with program and administrative staff, and introduction to one or more actual beneficiaries, if possible. As a result of this visit, staff will determine whether an in-depth review is needed for further clarification of one or more issues identified during the on-site visit.

8.4.2.2 **A Program review** will focus on the specific subrecipient program activities. Program staff may be asked to define the strategic plans for the related programs and, as applicable, how those plans are used to help clients in those programs.

8.4.2.3 **A Financial review** will make the connections between the program budget, expenditures and actual beneficiaries assisted, including evidence of case managers time in client files, reviewing payroll documents for the period clients are reported, determining eligibility of clients based on income documentation in client files, the general relationship between the contents of client files (excluding Attorney Client or HIPAA confidential data) and benefit data reported by the subrecipient on the same clients.

8.4.2.4 **The number of case files** to be reviewed will reflect approximately 10% of the total clients served in the program, or more if there appear to be any systemic issues that need to be addressed.

8.4.2.5 **Invoices** may be randomly selected for review and traced back from City

reimbursement to the original organization's advance expenditure and client assisted (if appropriate). For example, exact dollars billed for housing accessibility modifications can be traced directly to one client. Conversely, a different review model is required when dollars billed provided case management for multiple homeless individuals. It is expected that staff will review original invoices, cancelled checks, and other such documentation evidencing the expenditure, the relationship to the CDBG program objective, the appropriate proportion of CDBG expenditure in comparison to other funding, and accounting receipt of the federal grant funds.

8.4.3 In-Depth Review

8.4.3.1 An in-depth review will be a concentrated and focused review around a particular activity or program area. This will typically be a concentrated review of a known high-risk area or critical function, such as but not limited to:

- 8.4.3.1.1 Financial review for expenditures for ineligible activities,
- 8.4.3.1.2 Financial review for expenditures that cannot be traced through supporting documentation,
- 8.4.3.1.3 A program which requires donations as a condition of receiving service,
- 8.4.3.1.4 Management practices in affordable housing,
- 8.4.3.1.5 Section 504 compliance reviews upon receipt of a complaint from a person with disabilities,
- 8.4.3.1.6 A fair housing complaint from a home seeker treated differently while trying to obtain housing from the subrecipient,
- 8.4.3.1.7 Denial of services for no valid reason, or
- 8.4.3.1.8 Failure to meet prevailing wage requirements in construction activities subject to Davis Bacon, etc.

8.5 At the conclusion of each monitoring review, staff will send each subrecipient written documentation of the monitoring review, summarizing what was reviewed, and indicating any findings of regulatory non-compliance or concerns of program weaknesses. Additionally, staff will provide technical assistance to correct any deficiencies noted, and will acknowledge the performance level of the program, and whether they will either meet or fall short of contract goals.

9.0 HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS):

9.1 Data Collection and Recordkeeping: HMIS records must reflect that each subrecipient entered data on all persons it served under ESG and on all of its ESG activities into the applicable community-wide HMIS or, for victim services providers (and legal services providers that opt out), into a comparable database, in accordance with HUD's HMIS data standards. [24 CFR 576.400(f); 24 CFR 576.500(n); 2014 HMIS Data Standards]

9.2 Eligible costs (HMIS): If the subrecipient is not a victim service provider, or a legal service provider

that uses a comparable database, ESG funds must only be used for costs eligible for the purpose of contributing data to the HMIS designated by the CoC. [24 CFR 576.107(a)(1)]

- 9.3 Data entry (Comparable database): If the subrecipient is a victim service provider, or a legal services provider that uses a comparable database, the data maintained is in the comparable database and not contributed or entered into an HMIS. [24 CFR 576.400(f)]
- 9.4 Eligible costs (Comparable database): If the subrecipient is a victim service provider, or a legal services provider that uses a comparable database, the funds must be used for establishing and operating a comparable database that complies with HUD's HMIS requirements, including collecting client-level data over time (i.e., longitudinal data) and generating unduplicated aggregate reports. [24 CFR 576.400(f); 24 CFR 576.107(a)(3); 24 CFR 576.107(b)]

10.0 **ADMINISTRATIVE COSTS AND FINANCIAL MANAGEMENT:**

- 10.1 Eligible activities: A subrecipients' expenses must be allowable, allocable, and reasonable. [24 CFR 576.100-576.109; 24 CFR 576.500(u)(2); 24 CFR 84.21(b)(6); 24 CFR 85.22]
- 10.2 Eligible Costs: Each subrecipient will charge staff and overhead costs directly related to carrying out activities eligible under one of the component to the applicable activity, and retain supporting documentation for all costs charged to the grant. [24 CFR 576.100(d); 24 CFR 576.108(a); 24 CFR 576.500(u)]
- 10.3 Eligible Administrative Costs: When a subrecipient receives Administrative funds:
- 10.3.1 All the administrative costs must be eligible in accordance with 24 CFR 576.108; and
- 10.3.2 The costs of carrying out the environmental review will be charged as an Administrative activity. [24 CFR 576.108(a)(1), (2), and (4)];
- 10.4 Training Costs: If any staff time was spent on training:
- 10.4.1 It is only for providing training on ESG requirements, attending HUD-sponsored ESG training, training staff on using HMIS or a comparable database, or attending HUD-approved training on HMIS and the ESG program; and
- 10.4.2 Is charged to the appropriate component (only HMIS for HMIS-related training, and Administrative costs for all other training). [24 CFR 576.108(a)(1), (2), and (4); 24 CFR 576.107]
- 10.5 Indirect Costs: If any indirect costs were charged to the grant, all allocations made to each eligible activity must be consistent with an indirect cost rate proposal developed in accordance with the Uniform Administrative Requirements. [24 CFR 576.109; 24 CFR 576.500(u)]

10.6 Eligible activities: A review of personnel costs charged to ESG, including a review of job descriptions, should reveal that, all staff time paid for with ESG funds was working on eligible ESG activities. [24 CFR 576.500(u)]

11.0 **STREET OUTREACH:**

11.1 Street Outreach: Street outreach costs are limited to the costs of: providing essential services necessary to reach out to unsheltered homeless people; connecting unsheltered homeless people with emergency shelter, housing, or critical services; and providing urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. [24 CFR 576.101(a)]

11.2 Engagement: ESG funds used for Street Outreach engagement are limited to the costs listed under 24 CFR 576.101(a)(1).

11.3 Case Management: ESG funds used only for the costs of assessing housing and service needs, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant, for services and activities listed under 24 CFR 576.101(a)(2).

11.4 Emergency Health Services: ESG funds used for emergency health services limited to the costs of direct outpatient treatment of medical conditions (as listed under 24 CFR 576.101(a)(3)) that is provided:

11.4.1 By licensed medical professionals operating in community-based settings, including streets, parks, and other places where unsheltered homeless people are living, and

11.4.2 Only to the extent that other appropriate health services are inaccessible or unavailable within the area. [24 CFR 576.101(a)(3)]

11.5 Emergency Mental Health Services: ESG funds used for emergency mental health services limited to the costs associated with direct outpatient treatment (as listed under 24 CFR 576.101(a)(4)) that is provided:

11.5.1 By licensed professionals of mental health conditions operating in community-based settings including streets, parks, and other places where unsheltered people are living, and

11.5.2 Only to the extent that other appropriate health services are inaccessible or unavailable within the area. [24 CFR 576.101(a)(4)]

11.6 Transportation: ESG funds used for transportation limited to the following eligible costs:

11.6.1 The transportation costs of travel by outreach workers, social workers, medical professionals, or other service providers, and that the travel took place during the provision of services eligible under this section; and

11.6.2 The costs of transporting unsheltered people to emergency shelters or other service facilities, as listed under 24 CFR 576.101(a)(5).

12.0 **INVOLUNTARY FAMILY SEPARATION (EMERGENCY SHELTER):**

12.1 The City of Modesto has and will ensure its subrecipients have policies and procedures in place to ensure that providers of emergency shelter that serve households with children under 18 do not deny admission to a family based on the age of any child under 18. [24 CFR 576.102(b)]

13.0 **WRITTEN STANDARDS**

13.1 All activities carried out will be in compliance with the applicable written policies and procedures for admission, diversion, referral, and discharge by emergency shelters assisted under ESG, including standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations (e.g., victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing and are likely to be homeless the longest. [24 CFR 576.400(e)(1); 24 CFR 576.400(e)(2); 24 CFR 576.400(e)(3)(iii)]

13.2 All activities carried out will be in compliance with the applicable written policies and procedures for assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to emergency shelter. [24 CFR 576.400(e)(1), (2), and (3)(iv)]

13.3 All activities carried out in compliance with the applicable written policies and procedures for coordination among emergency shelter providers, essential services providers, homelessness prevention, and rapid re-housing assistance providers; other homeless assistance providers; and mainstream service and housing providers. [24 CFR 576.400(e)(1); 24 CFR 576.400(e)(2); 24 CFR 576.400(e)(3)(v)]

14.0 **HOMELESS PREVENTION AND RAPID RE-HOUSING:**

14.1 The City of Modesto and/or its subrecipients will periodically adopt written standards for the provision of homelessness prevention and rapid re-housing assistance, as required by 24 CFR 576.400(e)(1) and 24 CFR 576.400(e)(2).

14.2 These written standards cover the following topics (listed in 24 CFR 576.400(e)(3)):

14.2.1 Evaluating individuals' and families' eligibility for assistance under ESG;

14.2.2 Coordination among emergency shelter providers, essential services providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers;

14.2.3 Determining and prioritizing which eligible families and individuals would receive homelessness prevention assistance and which eligible families and individuals would receive rapid re-housing assistance;

14.2.4 Determining what percentage or amount of rent and utilities costs each program participant must pay while receiving homelessness prevention or rapid re-housing assistance;

14.2.5 Determining how long the program participant will be provided with rental assistance and whether and how the amount of that assistance would be adjusted over time;

14.2.6 Determining the type, amount, and duration of housing stabilization and/or relocation services to provide to the program participant.

14.3 The City of Modesto will confirm the program participant records show that homelessness prevention and rapid re-housing assistance were provided in accordance with the applicable written standards. [24 CFR 576.400(e)(1); 24 CFR 576.400(e)(2); 24 CFR 576.400(e)(3)(i); 24 CFR 576.400(e)(3)(v); 24 CFR 576.400(e)(3)(vi); 24 CFR 576.400(e)(3)(vii); 24 CFR 576.400(e)(3)(viii); 24 CFR 576.400(e)(3)(ix); 24 CFR 576.500(f)]

15.0 **HOUSING RELOCATION AND STABILIZATION SERVICES**

15.1 **Financial Assistance Costs**: Must be eligible costs as listed in 24 CFR 576.105(a) and paid only to a housing owner, utility company, or other third party (not directly to the program participant). [24 CFR 576.105(a)].

15.2 **Rental Assistance (Limit)**: Each program participant's total rental assistance, including any rental arrears and last month's rent, stay within the limit of 24 months during any 3-year period. [24 CFR 576.106(a)]

16.0 **MATCHING REQUIREMENTS**

16.1 The City of Modesto is a metropolitan city, it makes matching contributions to supplement its ESG program in an amount that equals the amount of ESG funds provided by HUD. [24 CFR 576.201(a)(1)]

16.2 All matching contributions meet the following requirements:

16.2.1 All requirements that apply to the ESG funds provided by HUD, except the expenditure limits;

16.2.2 The matching contributions were provided after the date that HUD signed the grant agreement;

16.2.3 Cash contributions were expended within the expenditure deadline and noncash contributions were made within the expenditure deadline;

16.2.4 Contributions used to match a previous ESG grant were not used to match a subsequent ESG grant;

16.2.5 Contributions that have been or will be counted as satisfying a matching requirement of another federal grant or award were not counted as satisfying ESG matching requirements; and

16.2.6 The statutes governing any of the federal funds the recipient used as matching contributions do not prohibit the use of those funds as match for ESG. [24 CFR 576.201(c)(1)-(5); 24 CFR 576.201(b)(2)(i); 24 CFR 576.203]

17.0 **PROCUREMENT REQUIREMENTS**

17.1 The City of Modesto and its subrecipients are required to use established written procurement

procedures. [24 CFR 84.44(a); 24 CFR 85.36(b)(1)]

18.0 EQUIPMENT AND EQUIPMENT DISPOSITION REQUIREMENTS

18.1 Sample Equipment Tracking Table

18.1.1 This or a similar tracking table will be utilized for any equipment acquired or disposed of utilizing ESG funding.

Complete the table below after selecting equipment transactions for review. (If additional rows are needed, please attach an additional sheet.)						
Item	Date Acquired	Acquisition Cost	Federal Share of Acquisition Cost	Disposition Date	Disposition Proceeds	Federal Share of Disposition Proceeds (in \$)

18.2 Equipment Management

18.2.1 The City of Modesto and its subrecipients maintain equipment records that contain the information required by the applicable regulations. [24 CFR 84.34; 24 CFR 85.32(d)(1); 24 CFR 576.407(c)]

18.3 Equipment Disposition

18.3.1 The City of Modesto and its subrecipients' must have procedures requiring efforts to obtain the highest possible return for sale of equipment. [24 CFR 84.34(f)(6); 24 CFR 85.32(d)(5); 24 CFR 576.407(c)]