

**EMERGENCY SOLUTIONS GRANT 2020 CARES
ACT ROUND TWO APPLICATION**

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INTRODUCTION

Congress passed the Coronavirus Aid, Relief and Economic Security (CARES) Act on March 27, 2020. The Act provides supplemental Relief funding in addition to the regular Emergency Solutions Grant Program funds. The priorities for this supplemental funding include:

- To prevent, prepare for and respond to the coronavirus by supporting additional homeless assistance and homelessness prevention activities;
- To support additional homeless assistance and homelessness prevention activities; and
- To mitigate the impacts created by coronavirus under the Emergency Solutions Grants program as authorized under the B of title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11371 et seq.).

The Oklahoma Department of Commerce (ODOC) received a total of \$17,978,443 in Emergency Solutions Grant CARES Act (ESG-CR or ESG-CR) funds: \$5,743,528 in the first round allocation (ESG-CR1) and \$12,234,915 in the second round allocation (ESG-CR2). ODOC’s ESG-CR1 contract period is from July 1, 2020 through August 31, 2021. This Request for Application (RFA) is for ODOC’s ESG-CR2 allocation that will have a contract period from September 1, 2021 through August 31, 2022. According to the [ESG-CV Notice](#) Part III.B.2 effective September 1, 2020, all first and second allocations of ESG-CR funds must be expended for eligible activity costs by September 30, 2022.

ODOC has created the *ESG-CV(CR) Addendum to the Implementation Manual* and can provide that information, along with ODOC’s *ESG Implementation Manual*, upon request. Where the ESG-CR guidance is “silent”, we will use our current ESG regulations. As new guidance is released, ODOC will update requirements and policies where appropriate.

TIMETABLE

Date	Description
June 29, 2021 at 10 a.m.	Mandatory ESG-CR2 Application Workshop over Zoom
June 30 – July 30, 2021	Applications entered into OKGrants
July 30, 2021 by 5:00 p.m.	Application must be submitted into OKGrants
August, 2021	ODOC Staff Reviews, verifies potential subrecipients
August 23, 2021	Approximate Date for Award Notification
September 1, 2021	ESG-CR2 ESG Contract Start Date
August 31, 2022	ESG-CR2 contract end date. All funds must be expended by this date.
45 Days after the End Date	ESG-CR Closeout Documentation Due to ODOC.

EMERGENCY SOLUTIONS GRANT 2020 CARES ACT ROUND TWO (ESG-CR2) REQUEST FOR APPLICATION

BACKGROUND

The original Homeless Assistance Grants were originally established by the Homeless Housing Act of 1986, in response to the growing issue of homelessness among men, women, and children in the United States. In 1987, the Emergency Shelter Grant Program was incorporated into subtitle B of title IV of the Stewart B. McKinney-Vento Homeless Assistance Act (42 U.S.C. 11371-11378). In May 2009 the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act was signed establishing the newly reauthorized and updated Emergency Solutions Grant Program. This program is still the first step in a continuum of homeless assistance operated by the Department of Housing and Urban

Development (HUD). Since its inception and incorporation into the McKinney-Vento Act, the ESG Program has helped States and localities provide facilities and services to meet the needs of homeless people.

On March 27, 2020, the president signed the Coronavirus Aid, Relief, and Economic Security (CARES) Act (P.L. 116-136) into law. The CARES Act provided \$4 billion for the Emergency Solutions Grants (ESG) Program to prevent, prepare for, and respond to coronavirus, among individuals and families who are homeless or receiving homeless assistance, and to support additional homeless assistance and homelessness prevention activities to mitigate the impacts created by coronavirus.

PURPOSE

These special ESG-CR2 funds are to be used to prevent, prepare for, and respond to the coronavirus pandemic (COVID-19) among individuals and families who are homeless or receiving homeless assistance and to support additional homeless assistance and homelessness prevention activities to mitigate the impacts of COVID-19.

GENERAL PROGRAM REQUIREMENT OVERVIEW

- These competitive program funds are to be used to provide services to clients who meet the HUD definition of homelessness, including the new expansion of the definitions at risk of homelessness and other federal regulation definitions of homelessness.
- Grant recipients must be an active participant in their local Continuum of Care.
- Grant recipients must use their local Continuum of Care HMIS database. The only exception is for Domestic Violence Shelters who must have a comparable client-tracking database approved by ODOC. A comparable database must include the capacity to create reports that can be uploaded into the SAGE Reporting System.
- Grant recipients must participate in the Continuum of Care Point in Time Count Survey.
- Grant recipients must be signed up for the federal System for Award Management (SAM) system. The website is www.sam.gov.

ESG-CR2 FLEXIBILITIES

- Funds are not subject to the spending cap on Emergency Shelter and Street Outreach under 14 CFR 576.108 (a);
- Up to 5 Percent of funds may be used for Administrative Costs for the sub-recipient (Agencies who sign contracts after being awarded funds);
- Funds are exempt from ESG Match requirements, including 24 CFR 576.201;
- Individuals and families experiencing homelessness must not be required to receive treatment or perform any other prerequisite activities as a condition for receiving shelter, housing, or other services for which these funds are used, notwithstanding 24 CFR 576.401 (e) (Housing First).

ELIGIBLE APPLICANTS

- Private Nonprofits that have a yearly independent audit and have received ODOC's ESG20 or ESG-CR1 funds may directly apply for an ESG-CR2 grant without sponsorship.
- Emergency Shelters that are owned and/or operated by a unit of general local government or a CAA must submit their request for funding through their owner.
- In the past, annual ESG and ESG-CR1 applicants seeking ESG funding through ODOC for the first time were required to have a Sponsor. First-time applicants that are applying for ESG-CR2 and have an independent audit will not be required to have a sponsor, though may seek sponsorship if they choose.
 - First-time applicants may seek sponsorship from either a unit of general local government, Community Action Agency (CAA) operating in that jurisdiction, or a private nonprofit that has previous experience with following federal regulations and being an umbrella organization. For example, a local United Way or the Nonprofit arm of a Housing Authority.
- Private Nonprofits that did not receive ODOC's ESG20 or ESG-CR1 funds will need a letter from the Continuum of Care stating they are essential to helping with the increased needs of the Community/Service Area due to the COVID-19 Pandemic before they can apply for ESG-CR2 funds.
- Any applicant that does not have a yearly independent audit must apply for ESG-CR2 funds through a sponsor that does.

AUDIT REQUIREMENT

All audits of prior awards from ODOC/CD must be in accordance with [ODOC Administrative Code Section 150:1-21-4](#). An audit is required if \$25,000 or more was received from ODOC/CD. The audit should be completed and the report submitted no later than six (6) months after the end of the contractor's fiscal year.

If the audit has not been submitted or the audit is not closed prior to the release of funds, then the contractor may be unable to draw funds unless a good cause is shown and approved by ODOC/CD.

SPONSORSHIP RESPONSIBILITIES

The Sponsor (unit of local government or local Community Action Agency) will be the signatory on the contract and the direct recipient of the ESG-CR2 funds. In turn, there must be a process in which the Sponsor receives documentation, such as invoices, to reimburse the non-profit for the services provided as approved in the written application.

The Sponsor is responsible for the oversight of the financial reporting and Federal Requirements of the sponsored non-profit.

A unit of general local government or CAA may retain shelter, outreach, rapid re-housing, HMIS, prevention or administrative funds to carry out certain activities. Not all funds used by the unit of general local government or CAA for shelter, outreach, rapid re-housing, HMIS, prevention or administrative activities must be used by the shelter.

A Sponsor/Shelter Agreement must be signed and submitted to ODOC before funds can be released.

LOCAL GOVERNMENT PROJECT APPROVAL

Distribution of funding to CAA/Nonprofit is permitted only when the unit of general local government, in which the assisted project is to be located, certifies that it approves the proposed project. This certification must be submitted to ODOC with the application. If the CAA/Nonprofit intends to provide homeless assistance in multiple jurisdictions, a certification of approval must be submitted by each of the units of general local government in which the project(s) are to be located.

THRESHOLD REQUIREMENTS FOR ESG-CR2

All ESG-CR2 Applicants must meet the listed threshold criteria. ODOC reserves the right to disqualify any applicant who does not meet one or more of the threshold criteria. Applicant/Shelter must have:

- an emergency shelter component or partnership to provide emergency shelter services;
- access to the Shelter or access to beds that must be available 24 hours /7 days/365 days a year unless it is a [Temporary Emergency Shelter](#) as defined in the [ESG-CV Notice](#);
- documentation of active involvement in Continuum of Care planning and coordination of service efforts;
- documentation that the applicant is a participating member of the Continuum of Care's Coordinated Intake/Assessment;
- required data/reporting through their Continuum of Care HMIS or comparable (DV organizations only) database;
- resolved all outstanding monitoring findings and audit or unresolved financial/program issues from previously awarded grants;
- all required certifications signed by the appropriate signatory;
- a complete set of written policies and procedures in which to manage the annual ESG and ESG-CR programs;
- Termination of Participation, Grievance, and Applicant Appeals Procedures;
- a process for participation of Homeless Persons in Policy-Making and Operations;
- a Confidentiality Policy;
- a [Duplication of Benefits Policy](#);
- a [Discharge Policy](#);
- a current Audit submitted before funds can be requested from grant;
- follow all General Record Keeping Requirements, both for financial and client files;
- meet all spending timeline requirements:
 - fifty percent (50%) of awarded funds must be spent within the first six (6) months of the contract; seventy-five percent (75%) must be spent within nine (9) months of the contract and one-hundred percent (100%) must be spent by the end of the contract period;

- activated in the System for Award Management (SAM), clear of any findings, and show as eligible for federal contracts and assistance awards.

POLICIES AND PROCEDURES STANDARDS

It is the responsibility of the sub-recipient to keep up with all new guidance and regulations released by the Office of Housing and Urban Development (HUD) and Department of Commerce (ODOC). New guidance or regulations do not have to be added to agency policy before the sub-recipient is responsible for implementation of the new guidance and/or regulations.

Each ESG-CR2 sub-recipient must establish written standards for providing ESG-CR2 assistance. Returning applicants must submit documentation that the Program's Written Policies and Procedures have been reviewed by the Staff and Board at least once a year. Documentation must include a Board Agenda showing the Policies/Procedures as an Agenda item as well as the minutes produced from the meeting showing the discussion and approval of the Policies/Procedures from the Board. New subrecipients must have an established set of Policies and Procedures within ninety (90) days of receiving their ESG-CR2 Award letter. The new sub-recipient must submit a copy of the written Policies/Procedures, Board Agenda showing the Policies/Procedures as an Agenda item as well as the minutes produced from the meeting showing the discussion and approval of the Policies/Procedures from the Board.

ODOC's *ESG Implementation Manual* and *ESG-CV Addendum to the ESG Implementation Manual* outline required policy and procedure and can be provided upon request to Jessica.Izquierdo@OKCommerce.gov.

CONTINUUM OF CARE

The Continuum of Care (CoC) model is based on the understanding that homelessness is not caused by simply a lack of shelter, but involves a variety of underlying needs. ODOC collaborates with the CoC to alleviate homelessness through a community-based process that provides a comprehensive response to the diverse needs of homeless persons. Sponsors/Shelters must obtain verification from their Continuum of Care that they are involved in the CoC organization and service delivery process as well as participate in the HMIS data collecting, Point-In-Time Count Survey and Coordinated Intake. The fundamental components of a Continuum of Care system are:

- Outreach and assessment to identify a homeless person's needs.
- Immediate (emergency) shelter as a safe, decent alternative to the streets.
- Transitional housing with appropriate supportive services to help people reach independent living.
- Permanent housing or permanent supportive housing for the disabled homeless.

CONTINUUM OF CARE CRITERIA

Each of the eight (8) Continuum of Care organizations will be allocated a portion of the State program funds. For a Continuum of Care to be allocated funds, the Continuum must comply with the HUD Continuum rule definitions, regulations and timeline pertaining to Continuum structure and planning process. Although ODOC's annual ESG funds are not allocated and awarded to the entitled Tulsa and Oklahoma City CoCs, both CoCs will be allowed to apply for ESG-CR2 funds due to a large amount of ESG-CR2 funding the State of Oklahoma is receiving and to expand ESG-CR services. The ESG-CR2 funding formula has been updated accordingly.

DISTRIBUTION/REDISTRIBUTION OF NON-AWARDED FUNDS

CoC allocated funding may be redistributed to remaining Continuum of Care entities when:

- The CoC does not comply with the responsibilities listed above;
- A CoC is not considered an eligible Continuum of Care;
- Funds are not allocated due to there being any eligible CoC in a region;
- Dollars are returned due to lack of eligible applicants in a CoC region;
- Funds cannot be expended within the CoC and agencies within another CoC are in need of more funding.

These funds will be re-distributed to other eligible Continuum of Care organizations through a procedure set by ODOC/Community Development (CD). Any funds not awarded through a first round allocation will be redistributed evenly to the remaining CoC's to award to their eligible applicants until all funds have been awarded.

ODOC reserves the right to recapture any administrative funds not budgeted by the awarded sub-recipients equal to the maximum spending requirement allowed by HUD regulations. In the event a sub-recipient fails to fully expend all contract funds, or returns unspent funds at any point during the contract period, ODOC reserves the right to also reclaim and recoup any administrative funds that have been spent in excess of the prorated proportion of the admin awarded.

COC AUTHORITY RESPONSIBILITIES RELATING TO THE ESG PROGRAM:

- The CoC Governing Board must establish an Appeal Process for a case in which an Emergency Solutions Grant Program applicant has its application rejected. The Process must include the following:
 - Number of days in which the applicant has to appeal in writing;
 - How the Board shall meet to hear the appeal;
 - After local appeal procedures are exhausted; the applicant may appeal the CoC’s decision to ODOC.
- The CoC Governing Board must establish policies/procedures regarding how to redistribute funds that are returned to the CoC if funds are made available after initial awards are granted.
- The CoC Governing Board creates policies/procedures regarding how funds will be awarded/distributed throughout each Continua service area to best answer the Federal/State’s overall “No Wrong Door” goals.

ESG-CR2 FUNDS ALLOCATED TO CONTINUUM OF CARE

CoC	Allocation with Base of \$600,000
CLEVELAND	\$ 774,129.00
North Central	\$ 1,001,492.00
Northeast	\$ 1,108,090.00
Northwest	\$ 1,141,193.00
Southeast	\$ 1,579,437.00
Southwest	\$ 1,250,801.00
Tulsa	\$ 1,048,923.00
Oklahoma City	& 1,149,753.00

The formula used for ESG CR project funding:

- 10% - 2014 Estimated Total Population
- 20% - Weighted Median Income Measure
- 20% - April 2020 Quintile Tiering Based on Unemployment Rate
- 30% - December 2020 COVID-19 Cases Per County
- 10% - Uninsured SAHIE as of May 15, 2020
- 10% - Overcrowding

After ODOC has scored each eligible application, ODOC will enter into contractual agreements directly with the approved subrecipient to carry out the financial and programmatic requirements according to law. The contracts will outline the funding source, funding year, amount of funding, and terms and conditions.

SPECIAL PROJECT SET-ASIDE FUNDS

Each of Oklahoma’s eight CoC will also receive \$305,872.00 in Special Project Set-Aside funds on top of their allocation. The Special Project Set-Aside funds are available within the CoC for special projects related to Coronavirus relief, should be used to prevent, prepare for, and respond to the COVID-19 pandemic, and must fall within the eligible activities of the ESG-CR2 funding. The funds are set aside for a CoC that will allow the CoC to invest in ESG-CR2 eligible projects that are temporary and will not necessarily be continued after the money is gone. ODOC recommends that each CoC discusses and decides on a project or projects they would like to do and then an agency within the CoC can apply for it (separate from their ESG-CR2 application) on behalf of the CoC. Examples of special projects are contracting out case management services, investing in increasing coordination services within the CoC, or any other innovative eligible activities that assist individuals and families who are homeless or receiving homeless assistance and supports additional homeless assistance and homelessness prevention activities to mitigate the impacts of COVID-19. A CoC is permitted to decide to distribute the Special Project funds amongst the applicants within their CoC instead of using them for a special

project. Should the CoC not determine a use for the Special Project Set-Aside funds by November 1, 2021, those funds will be redistributed and allocated according to the ODOC's ESG-CR2 funding formula.

ELIGIBLE PROGRAM PARTICIPANTS

To receive financial assistance or services funded by ESG, individuals and families—whether [homeless](#) or housed but [at-risk of homelessness](#)—must at least meet the following minimum criteria:

- The household must be at or below 50 percent of Area Median Income (AMI). Income limits are available on [HUD's website](#).
 - When the household is literally homeless, the below 50% AMI Income limit cannot be used to determine approval for assistance. At the time the household is re-assessed or reevaluated for continued or extended assistance is when the household cannot make above 50 percent Area Median Income (AMI).
- The household must be either homeless or at risk of losing its housing and meet both of the following circumstances:
 - no appropriate subsequent housing options have been identified; AND
 - the household lacks the financial resources and support networks needed to obtain immediate housing or remain in its existing housing.
- ESG-CR2 funds can only go towards activities that are preventing, preparing for, and/or responding to the coronavirus.

ELIGIBLE PROGRAM ACTIVITIES

While flexible in terms of the wide range of services available to homeless sub-populations and preventing persons from becoming homeless, the ESG Program legislation and implementing regulations do limit the types of activities and amounts of funds that can be spent on different activities. Details regarding eligible activities are listed below. If an activity/service is not listed, then that activity/service cannot be funded through this program.

All eligibility activities allowed with the regular ESG program will also be allowed with the ESG-CR2 program and can be found in [24 CFR, Part 576.101 – 108](#). The [ESG-CV Notice](#) issued by HUD on September 1, 2020, also outlines additional ESG-CR2 activities (listed below under [ESG-CR2 FLEXIBILITIES FOR EXISTING ELIGIBLE ACTIVITIES](#) and [ESG-CR2 ADDITIONAL ELIGIBLE ACTIVITIES](#)).

All ESG-CR2 programs should be laser-focused on participants obtaining and maintaining housing. Below are component-based strategies ESG-CR2 applicants are expected to focus and build upon while structuring their ESG-CR2 programs to ensure that resources make meaningful, long-term, system-wide impacts on homelessness:

- **Emergency Shelter:**
 - Coordinate with CoCs to ensure shelter management protocols are updated for COVID-19 response.
 - Make investments that improve shelter quality and increase measures to prevent and mitigate the spread of infection such as ramping up shelter operations costs to pay for enhanced sanitation and hygiene measures or adding additional non-congregate shelter options to decompress congregate shelter.
 - Increase the likelihood of positive exits to housing with shortened stays by investing in the expansion of housing navigation.

Note: Any decision to sustain or expand shelter capacity should be supported by data on the number of people newly experiencing homelessness.

- **Rapid Re-Housing (RRH):**
 - Strategically employ RRH in rehousing efforts by encouraging varied data-driven program models to meet needs including:
 - Short-term diversion,
 - High-intensity service models for those who will need significant support to maintain housing, and
 - Linkage and transition to supportive housing when necessary for long-term housing retention.
 - Support efforts to:
 - Scale landlord engagement activities,
 - Participate in coordinated entry, and
 - Ensure people in housing are linked to appropriate services.

- **Street Outreach:**
 - Outreach is an opportunity to reach a community’s most vulnerable residents and engage them in services and housing.
 - Coordinate efforts with shelter, coordinated entry, and housing programs.
 - Ramp up outreach efforts and presence by increasing staff.
 - Focus on street outreach program models that improve housing-focused services, increase effectiveness of engagement, and improve the speed of exit from the homelessness system.
 - Identify new subrecipients to improve outreach to underserved populations.
- **Homeless Prevention:**
 - Utilize emerging [homelessness prevention resources](#).
 - Focus on coordinating with other CARES Act resources.
 - Ensure prevention efforts are focused on the most vulnerable households who would experience homelessness “but for” assistance.
 - Require the use of evidence-based prevention screening criteria.
 - Encourage connections to legal aid services for those who are at-risk due to eviction.
 - Support at-risk diversion efforts.
- **Administration:**
 - Ramp up program capacity to manage increases in number of subrecipients and award amounts.
 - Facilitate subrecipient coordination with CoCs, public health agencies, and health care resources.
 - Analyze data to project needs for various interventions.
 - Assess effectiveness of strategies and make mid-course corrections as necessary.
- **HMIS:**
 - Establish close coordination with HMIS lead agencies.
 - Monitor data to ensure indicators show equitable provision of housing and services.
 - Establish protocols for frequent data assessment to ensure that they align with need projections and that strategies are as responsive as possible.

ESG-CR2 FLEXIBILITIES FOR EXISTING ESG ELIGIBLE ACTIVITIES

According to the [ESG-CV Notice](#) released on September 1, 2020:

- **Administrative Costs.** The ESG-CR2 sub-recipient may use up to 5 percent of ESG-CR2 funds for administrative costs specified in [24 CFR 576.108](#), as opposed to 3.75 percent allowed for ODOC’s annual ESG.
- **No Cap for Emergency Shelter and Street Outreach Activities.** ESG-CR2 funds may be used for emergency shelter and street outreach activities without regard to the spending cap established by section 415(b) of the McKinney-Vento Act and [24 CFR Part 576.100\(b\)](#) meaning there does not have to be at least 40 percent of a sub-grantee’s total ESG-CR2 allocation budgeted towards housing (Rapid Re-Housing and Prevention together). Recipients may expend as much of their funding on street outreach and emergency shelter activities as needed to prevent, prepare for, and respond to coronavirus among people experiencing homelessness including mitigating the impacts caused by coronavirus.
- **Match.** ESG-CR2 funds are exempt from the ESG match requirements, including [24 CFR 576.201](#).
- **Prevention Assistance and Area Medium Income (AMI) Limits.** The funds may be used to provide homelessness prevention assistance (as authorized under [24 CFR 576.103](#) or subsequent HUD notices) to any individual or family who does not have income higher than HUD’s Very Low-Income Limit, or 50 percent AMI, for the area and meets the criteria in paragraphs (1)(ii) and (1)(iii) of the “at risk of homelessness” definition in [24 CFR 576.3](#).
1. HUD 50% AMI Income Limit Information can be found at: <https://www.huduser.gov/portal/datasets/il.html>.
- **Hotel/Motel Costs.** As permitted under [24 CFR 576.102\(a\)\(3\)](#), eligible costs include a hotel or motel voucher for homeless individuals and families where no appropriate emergency shelter is available. Additionally, the limitations on eligible activities provided in section 415(a) of the McKinney-Vento Act and [24 CFR part 576, subpart B](#) are waived and alternative requirements are established to the extent necessary to authorize ESG-CR2 funds to be used for the following hotel or motel costs for individuals and families experiencing homelessness,

receiving rapid re-housing assistance under the Continuum of Care (CoC) or ESG programs, receiving homelessness prevention under the ESG program, or residing in permanent supportive housing:

1. The sub-recipient may pay for a hotel or motel room directly or through a hotel or motel voucher.
 2. Funds can be used to pay for cleaning of hotel and motel rooms used by program participants as well as to repair damages caused by program participants above normal wear and tear of the room.
 3. These flexibilities are provided to allow recipients to secure hotel and motel rooms more quickly to be available when needed to prevent the spread of coronavirus (for example, when a program participant needs to isolate to keep from spreading the virus to other shelter occupants or household members).
- **HMIS Lead Activities.** The limitations on eligible activities provided in section 415(a) of the McKinney-Vento Act and [24 CFR part 576, subpart B](#) are waived to the extent necessary to authorize ESG funds to be used under [24 CFR 576.107](#) to pay for HMIS costs beyond where they are related to collecting data on ESG program participants and ESG program activities to the extent they are necessary to help the geographic area prevent, prepare for, and respond to coronavirus. Additionally, 24 CFR 576.107 that limits recipients to paying for the costs at 24 CFR 576.107(b) is waived to allow recipients that are not the HMIS Lead, as designated by the Continuum of Care, to pay for costs at 24 CFR 576.107(b), either directly or by sub-granting to the HMIS Lead if the HMIS Lead is an eligible subrecipient to the extent that the HMIS costs are necessary to help the geographic area prevent, prepare for, and respond to coronavirus. These flexibilities will allow communities to collect data that is necessary to coordinate and report on activities to prevent, prepare for, and respond to coronavirus among individuals and families experiencing homelessness, at risk of homelessness, and receiving homeless assistance.
 - **COVID-19 Vaccine Distribution.** Emergency Solutions Grants (ESG) annual or ESG-CR funds can be used for a wide range of activities that support vaccine planning and distribution. Eligible vaccine related costs under the street outreach and/or emergency shelter components include but are not limited to:
 1. Emergency Shelter: Renting spaces for vaccine events; hiring vaccine ambassadors to engage/educate peers about the vaccine; transporting people to/from vaccine events; staff training on vaccine and rollout strategies; and PPE and supplies at vaccine events.
 2. Street Outreach: Renting spaces for vaccine events; hiring vaccine ambassadors to engage/educate peers about the vaccine; transporting people to/from vaccine events; mobile outreach vans and staff to support vaccine distributions; staff training on vaccine and rollout strategies; and PPE and supplies at vaccine events.
 3. Recordkeeping documentation for this activity should include program records (expense supporting documentation) and document that costs are reasonable and appropriate.
 4. Per Section II.F.10 of the [ESG-CV Notice](#), ESG-CR sub-recipients cannot require program participants to perform any prerequisite activities, which includes mandating that participants take the COVID-19 vaccine, as a condition for staying in any shelter or receiving services.
 - **Legal Services.** Legal services established in [24 CFR 576.102\(a\)\(1\)\(vi\)](#) and [24 CFR 576.105\(b\)\(4\)](#) are limited to those services necessary to help program participants obtain housing or keep a program participant from losing housing where they currently reside.

ESG-CR2 ADDITIONAL ELIGIBLE ACTIVITIES

In addition to the eligible activities listed in [24 CFR part 576, subpart B](#), ESG-CR funds may be used for the following activities according to the [ESG-CV Notice](#) effective September 1, 2020:

- **Temporary emergency shelters.** As permitted by the CARES Act, ESG-CR2 funds may be used to pay for temporary emergency shelters for individuals and families experiencing homelessness to prevent, prepare for, and respond to coronavirus.
 1. Eligible costs include:
 - a. Leasing existing real property or temporary structures to be used as temporary emergency shelters;
 - b. Acquisition of real property (e.g. hotels, ancillary structures, parking lots). The total amount of ESG-CR funds used for acquisition must not exceed \$2.5 million per real property;
 - c. Renovation (including major rehabilitation and conversion) of real property (e.g., hotels) into temporary emergency shelters. Eligible costs include labor, tools, and other costs for renovation;

- d. Shelter operations costs including the costs of maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, supplies necessary for the operation of the temporary emergency shelter;
 - e. Services, including essential services under [24 CFR 576.102\(a\)\(1\)](#), housing search and placement services under [24 CFR 576.105\(b\)\(1\)](#), and housing search and counseling services as provided under [24 CFR 578.53\(e\)\(8\)](#); except as otherwise stated in [ESG-CV Notice](#) or [24 CFR part 576.408](#); and,
 - f. Other shelter costs ODOC pre-approves in writing.
2. Requirements:
- a. As permitted by the CARES Act, the use of funds for these shelters will not be subject to the habitability standards under section 417(c) of the McKinney-Vento Act, shelter standards at [24 CFR 576.403\(b\)](#), or the environmental review requirements that otherwise apply to the use of ESG funds if the shelters have been determined by State or local health officials to be necessary to prevent, prepare for, and respond to coronavirus. Recipients and sub-recipients must still comply with nondiscrimination and applicable accessibility requirements, including requirements under [Section 504 of the Rehabilitation Act](#), the [Fair Housing Act](#), the [Americans with Disabilities Act](#), and their implementing regulations. See also [24 CFR 576.407\(a\)](#);
 - b. These temporary emergency shelters shall not be subject to the minimum periods of use required by section 416(c)(1) of the McKinney-Vento Act and [24 CFR 576.102\(c\)](#) and shall be considered as excluded by law from any certifications recipients submit pursuant to [24 CFR 91.225\(c\)\(1\)](#) through (c)(4) or 91.325(c)(4)(i) through (c)(4)(iv); however, if funds were used for acquisition or renovation (including conversion or major rehabilitation), the property's use and disposition will be subject to the real property requirements in [2 CFR 200.311](#);
 - c. In general, ESG-CR2 funds may be used to support temporary emergency shelters to prevent, prepare for, and respond to coronavirus until January 31, 2022. This January 31, 2022 limit will ensure that ESG-CR funds are available to serve more individuals and families with assistance to prevent, prepare for, and respond to coronavirus.
 - d. In addition to the records required at [24 CFR 576.500](#), the recipient must retain documentation that the property or structure or portion of a structure used as temporary emergency shelter met the definition of temporary emergency shelter during the time it was so used. For example, a recipient could document that the property is typically a hotel and is only being used as an emergency shelter for the period of time that the property is typically a hotel and is only being used as an emergency shelter for the period of time that public health officials determine special measures are needed to prevent the spread of coronavirus;
 - e. Whether or not services are provided as part of temporary emergency shelter, the recipient or subrecipient must assure that for each program participant receiving shelter, the individual or family's service needs are evaluated as required by [24 CFR 576.401\(a\)](#) and appropriate services are made available as needed in accordance with [24 CFR 576.401\(d\)](#), and a program participant in temporary emergency shelter shall be eligible to receive essential services from the recipient or sub-recipients other than the program participant's shelter provider;
 - f. A temporary emergency shelter may provide space for program participants to receive services consistent with [24 CFR 576.401\(d\)](#) even if the services are not ESG-funded or not funded as part of the shelter project;
 - g. Program participants cannot be required to sign leases or occupancy agreements, receive treatment, or perform any other prerequisite activities as a condition for staying in any shelter or receiving services; and
 - h. In all other respects, the funding and operation of temporary emergency shelters must comply with the ESG-CR requirements for emergency shelters under the ESG-CV Notice and [24 CFR part 576](#).
- **Training.** As permitted by the CARES Act, ESG-CR funds may be used for training on infectious disease prevention and mitigation for staff working directly to prevent, prepare for, and respond to coronavirus among persons who are homeless or at risk of homelessness and the use of funding shall not be considered administrative costs for purposes of the five percent cap. In addition, the limitations on eligible activities

provided in section 415(a) of the McKinney-Vento Homeless Assistance Act and [24 CFR part 576, subpart B](#) are waived and alternative requirements are established to the extent necessary to authorize ESG-CR funds to be used for training on infectious disease prevention and mitigation for homeless assistance providers, including those who do not receive funding through the CARES Act, to help them best prevent, prepare for, and respond to coronavirus among persons who are homeless or at risk of homelessness.

1. These training costs can and should be charged to the ESG activity for which the employee is working and being trained under (i.e. Outreach, Shelter, Prevention, Rapid Re-Housing, or HMIS).
 2. Recordkeeping documentation for this activity should include agendas/meeting notes to support the eligibility of the expense as well as notation of the training on employee timesheets.
- **Hazard Pay.** As permitted by the CARES Act, funds may be used to pay hazard pay for sub-recipient staff working directly to prevent, prepare for, and respond to coronavirus among persons who are homeless or at risk of homelessness. Examples of sub-recipient staff working directly in support of coronavirus response include emergency shelter intake staff, street outreach teams, emergency shelter maintenance staff, emergency shelter security staff, staff providing essential services (e.g., outpatient health or mental health, housing navigators), and staff in proximity to persons with coronavirus or working in locations with a high likelihood of contracting coronavirus.
 1. In general, hazard pay must be permitted in an organization's written policies, needs to be consistent with similar work paid for with non-grant funds, and must follow the requirements at [2 CFR 200.400](#).
 2. These costs can and should be charged to the ESG activity for which the employee is working (Prevention, Rapid Re-Housing, Shelter, Street Outreach).
 3. Recordkeeping documentation for this activity should include job descriptions, policies and procedures or other program records that detail positions receiving hazard pay.
 - **Handwashing Stations and Portable Bathrooms.** The limitations on eligible activities provided in section 415(a) of the McKinney-Vento Homeless Assistance Act and [24 CFR part 576, subpart B](#) are waived and alternative requirements are established to the extent necessary to authorize ESG-CR funds to be used under [24 CFR 576.101\(a\)](#) for installing and maintaining handwashing stations and bathrooms (e.g., porta potties) in outdoor locations for people experiencing unsheltered homelessness. Allowing ESG-CR funds to pay for the costs of handwashing stations and bathroom facilities will help prevent the spread of coronavirus by providing people living in unsheltered locations regular access to bathrooms and the ability to wash their hands.
 1. These costs should be charged to Street Outreach, but are also already eligible under the Emergency Shelter component for annual ESG.
 - **Landlord Incentives.** The limitations on eligible activities under section 415(a) of the McKinney-Vento Act and [24 CFR 576.105](#) are waived and alternative requirements are established to the extent necessary to authorize ESG-CR funds to be used under 24 CFR 576.105 to add the eligible cost of paying for landlord incentives as reasonable and necessary to obtain housing for individuals and families experiencing homelessness and at risk of homelessness. However, a recipient may not use ESG-CR funds to pay the landlord incentives set forth below in an amount that exceeds three times the rent charged for the unit. Waiving the limitation on eligible costs under housing relocation and stabilization services to pay for the costs of landlord incentives will increase the number of housing units available to people experiencing homelessness or at risk of homelessness, especially in tight rental markets and obtaining and maintaining housing is critical to preventing the spread of coronavirus and helping mitigate the economic impact of the crisis. The limitation to three times the rent charged for each unit ensures enough ESG-CR funds remain available to provide other eligible activities necessary to prevent the spread of coronavirus. Eligible landlord incentive costs include:
 1. Signing bonus equal to up to two months of rent;
 - a. Note: Since the Landlord Signing Bonus has a cap (no more than two months of rent), it is technically not a bonus but an *incentive*. However, so as not to cause confusion by naming it differently than what is found in the [ESG-CV Notice](#), it will still be named Signing Bonus.
 2. Security deposits equal to up to three months of rent;
 3. Paying the cost to repair damages incurred by the program participant not covered by the security deposit or that are incurred while the program participant is still residing in the unit; and,
 4. Paying the costs of extra cleaning or maintenance of a program participant's unit or appliances.

- **Use of Hotels/Motels to Prevent the Spread of the Coronavirus.** Funds may be used to isolate current Shelter, Rapid Re-Housing, and Prevention program participants from other shelter occupants or household members when needed to prevent the spread of the coronavirus. These flexibilities are provided to allow recipients to secure hotel and motel rooms more quickly to be available when needed to prevent the spread of coronavirus (for example, when a program participant needs to isolate to keep from spreading the virus to other shelter occupants or household members). Additionally, funds can be used to pay for cleaning of hotel and motel rooms used by program participants as well as to repair damages caused by program participants above normal wear and tear of the room.
 1. These costs must be charged to Shelter, even if program participants are being served with ESG Rapid Re-Housing or Prevention funds.
 2. Recordkeeping documentation for this activity should include program records (expense supporting documentation) and document that costs are reasonable and appropriate. Client files must contain justification that client is already being served with ESG Shelter, Rapid Re-Housing, or Prevention funds and due to COVID-19, needs to isolate away from other shelter clients or household. Documentation must also include proof that program participant has no other place to isolate and a motel/hotel is the only option.
 3. Providing permanent housing in hotels and motels is an ineligible use of ESG funds (including ESG-CR funds) under section 415(a) of the McKinney-Vento Act and [24 CFR part 576, subpart B](#).
- **Volunteer Incentives.** The limitations on eligible activities provided in section 415(a) of the McKinney-Vento Homeless Assistance Act and [24 CFR part 576, subpart B](#) are waived and alternative requirements are established to the extent necessary to authorize ESG-CR funds to be used under [24 CFR 576.101\(a\)](#), [24 CFR 576.102\(a\)\(1\)](#), and [24 CFR 576.105\(b\)](#) for cost of providing reasonable incentives to volunteers (e.g., cash or gift cards) who have been and are currently helping to provide necessary street outreach, emergency shelter, essential services, and housing relocation and stabilization services during the coronavirus outbreak. Waiving this requirement to allow the payment of reasonable costs of volunteer incentives will increase the number of people available to provide the needed services and connections to housing to individuals and families experiencing homelessness to prevent the spread of coronavirus.
 1. These costs can and should be charged to the ESG activity for which the volunteer is working (Prevention, Rapid Re-Housing, Shelter, Street Outreach).
 2. May be used for volunteers with lived experience of homelessness as long as the costs are reasonable and volunteer work is tied to preventing, preparing for, and responding to coronavirus.
 3. Recordkeeping documentation for this activity should include program records (expense supporting documentation) and document that costs are reasonable and appropriate.
- **Gift Cards.** The expense incurred for purchase of a gift card can only be reimbursed by ESG-CR funds when receipts are provided that verify the gift card was used to pay ESG-CR eligible costs.

SHELTER FACILITY REHABILITATION, CONVERSION, AND RENOVATION

Due to sub-recipient input and the large amount of ESG-CR funds the State of Oklahoma has received, ODOC will allow ESG-CR2 sub-recipients to rehabilitate, convert, and/or renovate their emergency shelter(s). These expenses have been ineligible in ODOC's past annual and ESG-CR1 grants, and will only be eligible under the ESG-CR2 grant.

Under the Emergency Shelter component, the ESG interim rule establishes an activity category for Shelter Operations, which includes maintenance—"including minor or routine repairs"—and a separate activity category for renovation (see [24 CFR 576.102\(a\)\(3\)](#) and [\(a\)\(2\)](#)). Refer to this [HUD SNAPS-Shots](#) for assistance in distinguishing between renovation/conversion and maintenance activities.

For costs of rehabilitation, conversion or renovation to be eligible for payment with ESG funds, the building must be used for an emergency shelter for homeless families and individuals. A government entity or private non-profit organization must own the emergency shelter building before and after the renovation or rehabilitation. Buildings renovated with ESG funds as a shelter for homeless individuals and families are required to function as a shelter for a minimum period of time, depending on the type of renovation and the value of the building. See the Table 1 below.

TABLE 1

Rehabilitation and Renovation Minimum Period of Use		
	Use Requirement	Determining Criteria
Major Rehabilitation	10 years*	Rehab costs exceed 75% of the value of the building before rehabilitation.
Conversion	10 years*	Conversion costs exceed 75% of the value of the building after conversion.
Renovation, including rehab and conversion costs that do not meet 10 Year criteria.	3 years	Renovation costs are 75% or less of the value of the building before renovation.
<u>*Recorded deed or use restriction required.</u>		

All shelters must meet the minimum habitability standards of [24 CFR 576.403\(b\)](#). Shelters renovated with ESG funds are also required to meet state or local government safety and sanitation standards, as applicable, including the use of energy-efficient appliances and materials.

In projects where lead-based paint evaluation and/or hazard reduction are undertaken with ESG funds as part of rehabilitation/renovation, additional Lead-Based Paint requirements apply as identified in [24 CFR 35.900-35.940](#). ESG funds may not be used for rehabilitation or renovation of structures that will be used for inherently religious activities. ESG funds may pay for rehabilitation of structures only to the extent that those structures are used for conducting eligible activities under the ESG program. Where a structure is used for both eligible and religious activities, the amount of ESG funds used may not exceed the cost of those portions of the rehabilitation that are attributable to eligible activities in accordance with the cost accounting requirements applicable to ESG funds. Sanctuaries, chapels, or other rooms used as a principal place of worship are ineligible for funded improvements paid by ESG.

ENVIRONMENTAL REVIEW

An environmental review is the process of reviewing a project and its potential environmental impacts to determine whether it meets federal, state, and local environmental standards. Levels of Environmental Review required for shelter rehabilitation, conversion, and renovation are outlined in Table 2 and more in depth in this [matrix](#).

TABLE 2

Types of Renovation Activities	ESG Definition	Minimum Period of Use	Level of Environmental Review Required
Minor Rehabilitation	The cost of the rehabilitation of an existing emergency shelter is 75% or less of the value of the building <u>before</u> rehabilitation*	3 years	Generally Categorically Excluded, Subject to §58.5 (Also subject to §58.6) (see 24 CFR 58.35(a)(3))
Major Rehabilitation	The cost of the rehabilitation of an existing emergency shelter exceeds 75% of the value of the building <u>before</u> rehabilitation*	10 years**	Environmental Assessment (May require an Environmental Impact Statement (EIS) if any conditions in §58.37 apply; also subject to §58.6)
Minor Conversion	The cost of the conversion of a building to an emergency shelter is 75% or less of the value of the building <u>after</u> conversion*	3 years	
Major Conversion	The cost of the conversion of a building to an emergency shelter exceeds 75% of the value of the building <u>after</u> conversion*	10 years**	

* The value of the building is the reasonable monetary value assigned to the building, e.g., by an independent real estate appraiser.

** A 10-year minimum period of use for major rehabilitation or conversion must be enforced by a recorded deed or use restriction.

ESG-CR2 sub-recipients are responsible for ensuring the environmental review process is completed according to 24 CFR Parts [50](#) and [58](#) and supplying all relevant information of the completion to ODOC before rehabilitating, converting, or renovating a shelter. Obligating or expending funds prior to the environmental process is an ineligible use of contract funds. Such funds may have to be returned to ODOC. Funds cannot be used to reimburse the local general fund for costs incurred prior to the beginning date of this contract. Also, the environmental review must be completed before the commitment of funds results in a [choice limiting action](#).

Sub-recipients and contractors shall comply with NEPA and the environmental requirements of other federal laws found in [24 CFR part 58](#).

TEMPORARY EMERGENCY SHELTERS AND ENVIRONMENTAL REVIEW

As permitted by the CARES Act and the [ESG-CV Notice](#), the use of funds for [Temporary Emergency Shelters](#) will not be subject to the habitability standards under section 417(c) of the McKinney-Vento Act, shelter standards at [24 CFR 576.403\(b\)](#), or the environmental review requirements that otherwise apply to the use of ESG funds if the shelters have been determined by State or local health officials to be necessary to prevent, prepare for, and respond to coronavirus. Recipients and sub-recipients must still comply with nondiscrimination and applicable accessibility requirements, including requirements under [Section 504 of the Rehabilitation Act](#), the [Fair Housing Act](#), the [Americans with Disabilities Act](#), and their implementing regulations. See also [24 CFR 576.407\(a\)](#).

ESG-CR2 WAIVERS

According to the [ESG-CV Notice](#) effective September 1, 2020, the requirements at [24 CFR part 576, subpart E](#) apply, except as otherwise established below:

- **Housing Stability Case Management.** As required by [24 CFR 576.401\(a\)](#) and (c), the recipient and its subrecipient must determine the available services and assistance that each ESG-CR program participant will need to achieve independent living and avoid further housing instability or homelessness, and the recipient and its subrecipient must assist each ESG-CR program participant, as needed, to obtain those services and assistance. However, HUD has made an across-the-board waiver of the ESG requirement in 24 CFR 576.401(e)(1) that housing stability case managers must meet not less than once per month with each program participant receiving homelessness prevention or rapid re-housing assistance. HUD has waived this requirement for all program participants receiving this assistance after qualifying as homeless to be consistent with the CARES Act prohibition stated in section III.F.10 of the [ESG-CV Notice](#). Additionally, HUD has waived the requirement for all program participants receiving assistance after qualifying as at risk of homelessness to prevent the spread of coronavirus and reduce the barriers to providing the homelessness prevention that is necessary to respond to coronavirus.
- **Fair Market Rent (FMR):** The requirement at [24 CFR 576.106\(d\)](#) that prohibits rental assistance where the rent for the unit exceeds the Fair Market Rent established by HUD, as provided under [24 CFR Part 888](#), is waived so long as the rent complies with HUD's standards of rent reasonableness, as established under [24 CFR 982.507](#). Waiving this requirement will allow recipients to help program participants move quickly into housing or retain their existing housing, which is especially critical at reducing the spread of coronavirus and responding to coronavirus.
- **Coordination with other targeted homeless services.** To ensure funds are deployed quickly to address the immediate public health crisis and prevent the spread of coronavirus, the coordination requirements at [24 CFR 576.400\(b\)](#) are waived.
- **System and Program Coordination with Mainstream Resources.** To ensure funds are deployed quickly to address the immediate public health crisis and prevent the spread of coronavirus, the coordination requirements at [24 CFR 576.400\(c\)](#) are waived.
- **Shelter and Housing Standards.** The lead-based paint remediation requirements of [24 CFR 576.403\(a\)](#) apply to all shelters for which ESG-CR2 funds are used and all housing occupied by program participants. The habitability requirements at 24 CFR 576.403(b) do not apply to temporary emergency shelters that have been determined by State or local health officials to be necessary to prevent, prepare for, and respond to coronavirus. However, recipients and sub-recipients must still comply with nondiscrimination and applicable accessibility requirements,

including requirements under [Section 504 of the Rehabilitation Act](#), the [Fair Housing Act](#), the [Americans with Disabilities Act](#), and their implementing regulations. See also [24 CFR 576.407\(a\)](#). All other shelters and housing for which ESG-CR2 funds must meet the applicable standards in 24 CFR 576.403(b) and 576.403(c).

ESG-CR2 LIMITATIONS

According to the [ESG-CV Notice](#) effective September 1, 2020, the ESG-CR funds are not required to follow the limitations outlined in the notice if the Local HUD Field Office completed the review of the Substantial Amendment to a recipient's Consolidated Plan before September 1, 2020. ODOC, being the ESG-CR recipient, submitted and received approval of a Substantial Amendment to the Consolidated Plan for the first round of ESG-CR funds (ESG-CR1) before September 1, 2020. Therefore, ODOC's ESG-CR1 funds were not subject to the limitations listed in the ESG-CV Notice. However, the Substantial Amendment to the Consolidated Plan for the second round of ESG-CR funds (ESG-CR2) was submitted and approved after September 1, 2020 meaning that the ESG-CR2 funds are subject to the following limitations:

- **Emergency Shelters.** The requirements at [24 CFR 576.102](#) apply, except funds may be used only for the costs of providing emergency shelter during the period beginning on the date the recipient or subrecipient began preventing, preparing for, and responding to coronavirus and ending on January 31, 2022, and only for those costs that are necessary to prevent, prepare for, and respond to coronavirus.
 - In other words, ESG-CR2 funds cannot be used for Emergency Shelter activities after January 31, 2022. This alternative requirement will ensure that ESG-CR funds are used efficiently to provide more individuals and families with assistance needed to prevent, prepare for, and respond to coronavirus.
- **Short-Term and Medium-Term Rental Assistance.** In [24 CFR 576.106\(a\)\(2\)](#), where medium-rent is defined as "for more than three months but not more than 24 months of rent" is waived and an alternative requirement is established where medium-term is established as for more than three months but not more than 12 months. In other words, ESG-CR2 funds cannot pay for more than 12 months of Rapid Re-Housing or Prevention assistance. This alternative requirement will allow more households to receive rapid re-housing and homelessness prevention assistance, which is necessary to prevent, prepare for, and respond to coronavirus.
 - Arrear payments must not be included when determining the limit of assistance a program participant can receive. For example, if a program participant owes six months of rental arrears, the six months total of rental arrears can be paid and the program participant is still eligible for a maximum of 12 months of medium-term rental assistance.

PROHIBITION AGAINST DUPLICATION OF BENEFITS

The CARES Act prohibits duplication of benefits and requires each sub-grantee to have procedures in place that prevent duplication of benefits when using CARES funds, meaning that the cost has not or will not be paid by another source.

Duplication of benefits refers to a person, household, business, government, or other entity that occurs when:

- an applicant receives assistance from multiple sources intended for the same purpose *and*
- the total amount of assistance received exceeds the total identified need.

ESG-CV sub-recipients must develop written procedures that outline steps that will be taken to prevent fraud, waste, abuse of the CARES funds, and prevent duplication of benefits when using CARES funds that includes the following:

1. Program design that targets primary needs (and are unlikely to be addressed by other sources)
2. Identify and document what other resources are available for the program
3. Identify and document available resources and any gaps in budgets that CARES funds could fill
4. Consider timing of funding availability from various sources
5. Includes methods utilized to ensure prevention of duplication of benefits
6. ESG-CV sub-recipients must have a process to check to see that sub-recipients, assisted individuals or families, businesses, and other entities that receive ESG-CV assistance have not previously received, or will not receive, duplicative assistance from another source before ESG-CV assistance is provided. *This duplication of benefits analysis may be accomplished in various ways including requiring these entities or beneficiaries to provide a self-certification indicating that they have not received a duplicative benefit, requiring them to fill out a questionnaire listing potentially duplicative assistance that they have already received, or reasonably anticipate receiving, and through other means.*

- a. ESG-CV sub-recipients must do this duplication of benefits analysis before providing ESG-CV assistance and should only pay for unmet needs not met by other sources of assistance.
- b. ESG-CV sub-recipients must also require that if sub-recipients, assisted individuals or families, businesses, and other entities subsequently receives a duplicative benefit, it agrees to repay the ESG-CV sub-recipient.

RELEASE OF FUNDS

Applicants awarded funds must submit and receive authority to use grant funds prior to expending grant funds. Funds will not be released until all required documentation has been received. Funds expended prior to the authority to use grant funds will not be reimbursed.

PAYMENTS

ODOC shall disburse funds to the Applicants who received award letters upon receipt and approval by ODOC of the Release of Funds. Once the "Release of Funds" has been authorized by ODOC, a reimbursement payment process through [OKGrants](#) will be implemented. The following documents must be uploaded in OKGrants with the Reimbursement Claim form for review before reimbursement payments are approved and delivered to subrecipient:

1. Monthly Progress HMIS (or comparable database) CAPER Report per program;
2. Monthly Expenditure Report from General Ledger showing the expenditure details for the totals reported on the Reimbursement Claim form;
3. Monthly Expenditure Report from General Ledger showing total expenses per line item.

DEADLINE FOR USING GRANT AMOUNTS

The grant period for the ESG project is 12 months effective from the first date of the contract. From the date the contract is signed with the Oklahoma Department of Commerce. Extensions to the program (grant) periods are made at the discretion of the State and will only be approved in extreme circumstances.

In addition, timelines within the twelve-month contract period have been established to ensure one-hundred percent (100%) of program funds are spent within the program period. Fifty percent (50%) of awarded funds must be spent by the first six (6) months of the contract; seventy-five percent (75%) must be spent within nine (9) months of the contract and one-hundred percent (100%) must be spent by the end of the contract period.

OBLIGATED

Funds are obligated once ODOC sends an award letter to each eligible Applicant stating the amount awarded and final instructions regarding how to execute contract. Funds cannot be expended until ODOC/CD receives an Environmental Review (if applicable), Sponsor Shelter Agreement or summary (if applicable) and a Request for Release of Funds. Upon receipt of these documents, ODOC will return to the Applicant a signed Release of Funds form.

REPORTING

Emergency Solutions Grant recipients will use HMIS through the applicable Continuum of Care to collect data and report on outputs and outcomes as required by HUD. The required data elements to be collected are included in the [FY 2020 HMIS Data Standards](#) (updated June 2020).

According to HUD's final ruling over data collection from Victim Service Providers (VSPs), the revised "VAWA Protections" include that VSPs are exempt from having to use any shared database such as the HMIS software to collect client information and services provided. However, data collection relating to non-confidential demographics and services provided is required to be reported by the VSP. A comparable database can be used to collect such data. The comparable database must meet all HMIS data standards and reporting requirements.

SAGE REPORTING

SAGE is the online portal for the submission of aggregate, de-identified data from HMIS or comparable databases via a Comma Separated Value (CSV) import. As of October 1, 2017, HUD now requires all ESG subrecipients to upload their CAPER report from HMIS into this database. SAGE replaces the former eCart database system. All Applicants who receive ESG funds will be required to upload Performance Report data to the SAGE System every three months. VSPs are not exempt from providing required aggregate data to upload into SAGE. The comparable system that VSPs use must be able to create a CSV file needed to upload to the SAGE system to meet requirements. If the VSP's comparable database

cannot provide required demographic data and cannot provide required reports in the required format (CSV file for SAGE) the VSP may be disqualified to be awarded Emergency Solution Grant funds. ESG-CR2 quarterly reports timeframes will be provided once a contract between ODOC and the ESG-CR2 sub-recipient is signed.

PERFORMANCE

ODOC reserves the right to recapture Emergency Solution Grant funds under the following circumstances:

1. Failure to obligate and spend within the time periods as specified:
 1. Fifty percent (50%) of awarded funds must be spent by the first six (6) months of the contract; seventy-five percent (75%) must be spent within nine (9) months of the contract.
2. Failure, without approved modification, to implement the project as set forth in the approved ESG-CR2 grant application.
3. Failure to meet threshold responsibilities during the contract period.

CERTIFICATIONS

Federal requirements will be assured by certifications in the grant application. Federal requirement certifications that must be submitted by applicants are as follows:

Local Government Certification – This form is signed by the local unit of government Chief Elected Official when the unit of government agrees to be the Sponsor for a nonprofit organization. The local unit of government agrees to follow federal regulations as it relates to building standards, assistance to the homeless along with other Department of Housing and Urban Development (HUD) laws and regulations.

Private Non-Profit Certification – This form is signed by the Executive Director of the Community Action Agency when said agency agrees to be the Sponsor for a nonprofit organization or the independent nonprofit itself. The signing entity agrees to follow federal regulations

Certification of Local Government Approval for Nonprofit Organizations – This form is signed by the Chief Elected Official of the city/town in which the Homeless Assistance program activities are being provided. The local government approves of the services being provided in their city/town.

Applicant Assurances – This is signed by the Applicant. The Applicant agrees that Homeless individuals will receive an appropriate level of service and will be given opportunities to participate in policy making decisions regarding shelter and services provided. Fix Section III

Program Certifications – This is signed by the Applicant. The Applicant agrees to comply with having policies relating to the State's Consolidated Plan, Confidentiality, Discharge Planning, Affirmatively Further Fair Housing and HMIS.

Certification of Consistency with Consolidated Plan HUD 2991 – This form is signed by the Certifying Official at ODOC (currently the Director of Community Development, Marshall Vogts). The Certifying Jurisdiction agrees that the Applicant's program is consistent with the jurisdiction's Consolidated Plan.

J. Drug-Free Workplace Requirements - The Drug-Free Workplace Act of 1988 (41 U.S.C. 701, et seq.) and HUD's implementing regulations as applied to ESG.

Lead-Based Paint Requirements - The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4801 et seq.), as amended by the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851 et seq.) and implementing regulations at 24 CFR part 35, subparts A, B, M, and R shall apply to housing occupied by families receiving assistance through ESG.

Anti-Lobbying Certification – This is signed by the Applicant. The Applicant agrees that no federally appropriated funds will be used for lobbying activities.

Request for Release of Funds and Certification – This is signed by the Applicant. The Applicant submits all forms necessary for Environmental Review compliance or states exemption status for Environmental Review process.

Applicant/Recipient Disclosure/Update Report – This form is signed by the Applicant. The applicant must disclose if they are receiving, or expect to receive, assistance from other HUD Programs that are subject to the disclosure requirements of Subpart C of 24 CFR Part 12.

Continuum of Care Lead Agency Participation letter – This is provided by the Continuum of Care Lead Agency. The letter must include that the shelter is a member of the Continuum of Care, the level of participation in the HMIS or comparable data collection database, level of participation during the Annual Point-in-Time Survey Count and any Continuum of Care committees or related participation.

VERIFICATION AND ON-SITE VISITS

The Oklahoma Department of Commerce/Community Development reserves the right to verify information and documentation received as part of the ESG-CR2 application. An on-site visit may be scheduled by ODOC to conduct an observation of the facility where the proposed ESG project will be carried out. On-site observations of shelter facilities will receive no more than 24-hour notice via telephone. A representative from both the shelter and the sponsor must be available during the visit. (If a site visit is warranted, all CDC, Department of Commerce and Shelter policies in regard to masks and social distancing will be followed to ensure the health and safety of all involved.)

MANDATORY APPLICATION WORKSHOP

Any organization planning on applying for the ESG-CR2 funds must attend the ESG-CR2 Mandatory Application Workshop via Zoom scheduled for **June 29, 2021 from 10am-12pm**. After the Application is made available in OKGrants on June 30, 2021, only questions of a clarifying nature will be answered. ODOC will not answer any questions regarding the Emergency Solutions program or provide technical assistance during the application process.

APPLICATION SUBMISSION REQUIREMENTS

All grant applications must be submitted electronically through the ODOC [OKGrants](https://grants.ok.gov/) Grant Management System at <https://grants.ok.gov/>.

OKGrants [instructions and guides](#) as well as [training videos](#) are available for those needing OKGrants training.

In the instance of a unit of general local government, CAA, or sponsor applying on behalf of more than one shelter, separate applications must be submitted for each shelter. Applicants may present multiple funding requests in a single application. When this occurs, answer the application questions associated with the highest level Tier for which funding is requested and list all Tiers the applicant is applying for under the appropriate application questions. Only one application per shelter will be accepted.

SHELTER BUDGET

According to the [ESG-CV Notice](#), ESG-CR2 shelter funds (for temporary shelter and regular emergency shelter expenses) may only be used until January 31, 2022 to ensure that ESG-CR funds are used efficiently to provide more individuals and families with assistance needed to prevent, prepare for, and respond to coronavirus.

ODOC has submitted a waiver request to HUD requesting that ODOC sub-recipients be permitted to continue to expend ESG-CR2 shelter funds through the end of the contract, but has not yet received a response.

ODOC is requesting that ESG-CR2 applicants fill out the shelter line item under the Budget Detail in OKGrants as if sub-recipients would be allowed to expend ESG-CR2 shelter funds for the entire contract period. Should it be determined that we will not be permitted to do this and must stop expending ESG-CR2 shelter funds by January 31, 2022, reimbursement for ESG-CR2 shelter funds will not be permitted after January 31, 2022 and shelter funds will be moved to other ESG-CR2 line items within the same contract and/or de-obligated from the contract.

ESG-CR2 SCORING PROCESS

1. Applications will be accepted through OKGrants and separated by Continuum of Care Service Area.
2. Applications will be assessed for compliance with all ESG and CoC threshold criteria first. Then an ODOC Committee will score and rank the submitted applications based on the approved rating system.
 - a. Scores and comments reflect the Reviewer's determination of the merit and feasibility of the project.
3. Highest to lowest scoring applicants will be awarded ESG-CR2 funds until the funds allocated to each Continuum of Care Service Area have been depleted.
 - a. Funds may be awarded, in whole or in part, based on the application's relative score and funding availability determined by the criteria established by ODOC.
4. ODOC will then conduct a Pre-Award Risk Assessment. The results of this survey will determine if an applicant is a Low, Medium or High Risk and will help determine any additional special conditions that will be added to the

Applicant's contract. First time applicants that are awarded funds will be automatically scored as a "High Risk" and will have special conditions added to their contract, including additional Technical Assistance, monitoring and submitted source documentation with every expense report.

5. ODOC will send award letters to subrecipients with final instructions regarding how contracts are initiated in OK Grants.
6. ODOC will enter into contractual agreements with each subrecipient to carry out the financial and programmatic requirements according to law. The contracts will outline the funding source, funding year, amount of funding, terms and conditions.
7. ODOC reserves the right to refuse funding to applications for, but not limited to, those that:
 - a. receive less than 50% of the total points available for the application;
 - b. receive High Risk assessment scores that show applicant has too many unresolved compliance issues to qualify for funding;
 - c. have not met all threshold requirements;
 - d. requested ineligible expenses in their budget not found by the reviewers.

ESG-CR2 APPLICATION CHECKLIST

For Applicants that applied for the ESG21 Program, you may use the signed forms from the ESG21 application.

For Applicants that did not apply for the ESG21 Program, please request a copy of the forms that need to be completed for the Application, including the ESG-CR2 COVID Community Assessment and Response Plan, by emailing Jessica Izquierdo at Jessica.Izquierdo@OKCommerce.gov.

OKGRANTS FORMS:

- Application Summary
- Project Narrative Exhibits (questions are [below](#)) with following uploads:
 - ESG-CR2 COVID Community Assessment
 - ESG-CR2 Response Plan
- Budget Detail (complete shelter line item as described [here](#))
- Budget Narrative Form
- Audit

APPLICATION FORMS TO BE UPLOADED TO OKGRANTS UPLOADS PAGE (for applicants that applied for the ESG21 program, you may use the signed forms from the ESG21 application):

- Program Certifications and Assurance, which includes
 - Section I. Applicant Assurances
 - Section II. Program Certifications (formerly ODOC 6)
 - Section III. Drug-Free Workplace (formerly ODOC 7)
 - Section IV. Anti-Lobbying Certification (formerly ODOC 8)
- Applicant/Recipient Disclosure/Update Report
- Certification of Consistency with Consolidated Plan HUD 2991
- Environmental Review Record for Exemptions/Release of Funds
- Continuum of Care Agreement for HMIS Data Entry
- Continuum of Care Lead Agency Participation letter
- System for Award Management (SAM.gov) PDF Search Verification of Non-DeBarred Status
- Letter from the Continuum of Care Lead Agency stating the agency is essential to helping with the increased needs of the Community/Service Area due to the COVID-19 Pandemic. (Required for applicants that did not apply for the ESG-CR1 or regular ESG20 Program.)
- In the case of a Community Action Agency, a signed letter must be submitted by the Unit of Local Government assuring that they will perform the environmental review

Required forms for Units of General Local Government

- Local Government Certification

-Or-

Required forms for Community Action Agency (CAA) or Independent Nonprofit

- Private Non-Profit Certification
- Certification of Local Government Approval for Nonprofit Organizations

SECTIONS I – III QUESTIONS

Section I - Proposed Use of Funds
Questions:
I-1) Describe the plans/steps in place to protect both staff and program participants from contracting the COVID-19 virus.
I-2) Describe how many staff plan to be brought back or new staff hired to ensure enough service is provided to all those in need during the grant period.
I-3) Describe the organization’s Emergency Shelter Component. Include actions/policies that have been added to stop the spread of COVID-19.
I-4) Describe the organization’s Street Outreach Services. Include actions/policies that have been added to stop the spread of COVID-19.
I-5) Describe how clients request and access Rapid Rehousing/Prevention assistance, including what documentation is collected/verified regarding the client’s program eligibility and how housing is selected.
I-6) Describe what level of case management clients receive. Identify the person(s) responsible for carrying out case management activities. Include the qualifications of the case managers identified in the response and training provided to case management staff.
Section II - Continuum of Care, Coordinated Intake, Partnership Requirements
Questions:
II-1) Explain how proposed services fit into the local CoC’s plan to take care of those most vulnerable in your service area affected by COVID-19.
II-2) Describe how the Organization will participate in the CoC’s Coordinated Intake Priority changes to meet the needs of those affected by COVID-19.
II-3) Describe the mainstream and local partners the applicant is working with to manage the needs of citizens affected by the COVID-19 pandemic.
II-4) What agencies in your area do you collaborate with to provide better care for your clients and how do you prevent duplication of services?
Section III - Community Needs Assessment (Uploaded)
Questions:
III-1) Upload your organization’s ESG-CR2 COVID Community Assessment here.
III-2) Upload your organization’s ESG-CR2 Response Plan here.

DEFINITIONS

For the purposes of this Request for Application, the following definitions will be used:

Administration: Units of General Local Government and/or Community Action Agencies are allowed 5% of the total award for administration of the ESG grant. These funds may be passed on to the shelter.

At risk of homelessness: According to [24 CFR 576.2](#),

1. An individual or family who:
 - A. Has an annual income below 50 percent of median family income for the area, as determined by HUD;
 - B. Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the "homeless" definition in this section; and
 - C. Meets one of the following conditions:
 - (a) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - (b) Is living in the home of another because of economic hardship;
 - (c) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 14 days after the date of application for assistance;
 - (d) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;
 - (e) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;
 - (f) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
 - (g) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;
2. A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or
3. A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

CAPER: The Consolidated Annual Performance and Evaluation Report (CAPER) provides annual performance reporting on client outputs and outcomes that enables an assessment of grantee performance in achieving the housing stability outcome measure. The CAPER, in conjunction with the Integrated Disbursement Information System (IDIS), fulfills statutory and regulatory program reporting requirements and provides the grantee and HUD with the necessary information to assess the overall program performance and accomplishments against planned goals and objectives

Choice Limiting Action: HUD defines a choice limiting action as one that may have an adverse impact on the environment or limit the choice of reasonable alternatives. A choice limiting action may include, but is not limited to, signing a lease agreement, real property acquisition, rehabilitation, repair, demolition, disposition, or new construction. Real property acquisition, new construction, disposition, and demolition are not eligible ESG Program costs; however, for the purposes of environmental review, projects are based on the aggregation of all activities that are included in the scope of the environmental review. So even if ESG Program funds are only used to pay for a portion of the overall project, recipients and subrecipients should still be aware of the non-ESG eligible activities involved that are considered choice limiting actions. Activities listed at [24 CFR 58.35\(b\)](#) that are Categorically Excluded Not Subject To 58.5 (e.g., Tenant-Based Rental Assistance, provision of services) are not choice limiting actions.

Consolidated plan: A plan prepared in accordance with [24 CFR part 91](#). An *approved consolidated plan* means a consolidated plan that has been approved by HUD in accordance with 24 CFR part 91.

Continuum of Care: The group composed of representatives of relevant organizations, which generally includes nonprofit homeless providers; victim service providers; faith-based organizations; governments; businesses; advocates; public housing agencies; school districts; social service providers; mental health agencies; hospitals; universities; affordable housing developers; law enforcement; organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons that are organized to plan for and provide, as necessary, a system of outreach, engagement, and assessment; emergency shelter; rapid re-housing; transitional housing; permanent housing; and prevention strategies to address the various needs of homeless persons and persons at risk of homelessness for a specific geographic area.

Co-Occurring Disorder: Persons who have a diagnosis of mental illness and a diagnosis of substance abuse, HIV/AIDS, or other health condition.

Debarment: The state of being excluded from certain possessions, rights, privileges, or practices and the act of prevention by legal means. For example, companies can be debarred from contracts due to allegations of fraud, mismanagement, and similar improprieties.

Discharge Policy: Policies and protocols, established and implemented to the maximum extent practicable and where appropriate, for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Duplications of Benefits: Duplication of benefits refers to a person, household, business, government, or other entity that occurs when:

- an applicant receives assistance from multiple sources intended for the same purpose and
- the total amount of assistance received exceeds the total identified need.

Eligible Applicants: Units of General Local Government and Community Action Agencies (CAAs). Typically, the Cities of Tulsa and Oklahoma City must apply directly to HUD and are therefore excluded from the receipt of funds administered by ODOC. However, for ESG-CR2 only, the Cities of Tulsa and Oklahoma City are allowed to apply for the ESG-CR2 grant.

Emergency Shelter: A facility designed to provide temporary housing for individuals and/or families lacking a fixed, regular, and adequate nighttime residence. Local policy shall determine length of stay in the shelter. Emergency Shelter services are available to all persons or individuals who meet the definition of homeless. No person or family shall be denied shelter or services if they are a part of the sub-population to be served by the shelter and do not pose a safety risk to themselves or others. Emergency Shelter operators must have a plan in place to assist in the provision of emergency services, including clothing, food, and assistance locating other state and local services and funds. Emergency Shelters shall be available 24 hours a day and seven (7) days per week.

ESG: Means, unless otherwise specified, the Emergency Solutions Grants Program whether funded through annual fiscal year (FY) appropriations or CARES Act funding. For example, a program participant assisted using only FY2021 ESG funding and a program participant assisted using only ESG-CR funding are both ESG program participants.

ESG-CV: Means the Emergency Solutions Grants Program as funded by the CARES Act and governed by requirements HUD establishes in accordance with that Act. ESG-CV funds do not include annual ESG funds (e.g., ESG21 grant funds). ODOC also refers to ESG-CV as ESG-CR.

Equipment and Furnishings: Typically large, one-time expenditures essential for the continued operation of the homeless shelter. Office equipment and major furniture replacement or purchase such as beds or cots for an expanding facility, are examples of items to be budgeted under Equipment and Furnishings.

Homeless: According to [24 CFR 576.2](#),

1. An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - A. An individual or family with a primary nighttime residence that is 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;

- B. An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
- C. An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;
- 2. An individual or family who will imminently lose their primary nighttime residence, provided that:
 - A. The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
 - B. No subsequent residence has been identified; and
 - C. The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;
- 3. Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:
 - A. Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
 - B. Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
 - C. Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
 - D. Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or
- 4. Any individual or family who:
 - A. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
 - B. Has no other residence; and
 - C. Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

Income Eligibility: A homeless individual shall be eligible for assistance under any program provided by the Stewart B. McKinney Homeless Assistance Act, or by the amendments made by this Act, only if the individual complies with the income eligibility requirements otherwise applicable to such program.

Exclusion: For purposes of this Act, the term “homeless” or “homeless individual” does not include any individual imprisoned or otherwise detained pursuant to an Act of the Congress or State Law.

Families with Children and Youth Defined as Homeless under other Federal Statutes: The term ‘families with children and youth defined as homeless under other Federal statutes’ means any children or youth that are defined as ‘homeless’ under any Federal statute other than this subtitle, but are not defined as homeless under section 103, and shall also include the parent, parents, or guardian of such children or youth under subtitle B of title VII this Act (42 U.S.C. 11431 et seq.).

Homeless Management Information System (HMIS): The information system designated by the Continuum of Care to comply with the HUD’s data collection, management, and reporting standards and used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at-risk of homelessness.

Housing First: an approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment or service participation requirements.

HUD: U.S. Department of Housing and Urban Development.

Long Term Emergency Shelter: The Transitional Shelter that was Grand-Fathered in as of 2010 is no longer an eligible activity for the ESG Program. Applicants are welcome to propose projects for long-term Emergency Shelter. This type of housing would be for clients whose needs to become stable enough for permanent housing will take longer than the regular shelter stay period. Details for approval of an extended length of stay in a shelter environment will have to be provided in the Project Narrative questions portion of the application.

Major Rehabilitation: Rehabilitation that involves costs in excess of 75 percent of the value of the building before rehabilitation. Major rehabilitation undertaken with ESG funds must meet local government safety and sanitation standards under 24 CFR 576.55. In addition, for projects of 15 or more units where rehabilitation costs are 75 percent or more of the replacement cost of the building, that project must meet the requirements of 24 CFR 8.23(a). The facility must be used as an emergency shelter for a period of not less than ten years after the ESG contract is closed or the applicant may be required to repay grant funds.

Nonprofit Recipient: Any nonprofit organization assisting the homeless to which a Unit of General Local Government or CAA distributes ESG funds.

Obligated: The ESG contractor, as appropriate, has placed orders, awarded contracts, received services, or entered similar transactions that require payment from the grant amount.

OKGrants: OKGrants is a grant management software system used to electronically capture all grant information from application to closeout. Any county, community or organization applying for a grant through the Oklahoma Department of Commerce must do so through OKGrants. All grant applications must be submitted electronically through the ODOC OKGrants Grant Management System at <https://grants.ok.gov/>.

Operations: Recurring costs incurred by a recipient operating a homeless shelter with respect to administration, rent, food for feeding the homeless, security, maintenance, utilities, fuels, and insurance for the homeless shelter.

Prevent, Prepare for, and Respond to Coronavirus - To assist in ensuring that an activity being paid for with ESG-CR2 funds is eligible, sub-recipients should consider the following:

1. **Prevent...coronavirus** means an activity designed to prevent the initial or further spread of the virus to people experiencing homelessness, people at risk of homelessness, recipient or subrecipient staff, or other shelter or housing residents. This includes providing Personal Protective Equipment to staff and program participants, paying for non-congregate shelter options such as hotels and motels, paying for handwashing stations and portable toilets for use by people living in unsheltered situations, and providing rapid re-housing or homelessness prevention assistance to individuals and families who are homeless or at risk of homelessness (as applicable) to reduce their risk of contracting or further spreading the virus.
2. **Prepare for...coronavirus** means an activity carried out by a recipient or subrecipient prior to or during a coronavirus outbreak in their jurisdiction to plan to keep people healthy and reduce the risk of exposure to coronavirus and avoid or slow the spread of disease. This includes updating written standards to prioritize people at severe risk of contracting coronavirus for shelter and housing consistent with fair housing and nondiscrimination requirements, adapting coordinated entry policies and procedures to account for social distancing measures or increased demand, developing a strategy and recruiting landlords to provide housing to people experiencing homelessness or at risk of homelessness, training homeless providers on infectious disease prevention and mitigation, and implementing a non-congregate shelter strategy to reduce the spread of coronavirus.
3. **Respond to coronavirus** means an activity carried out once coronavirus has spread to people experiencing homelessness, provider staff, or once individuals and families lose or are at risk of losing their housing as a result of the economic downturn caused by coronavirus. This includes transporting individuals and families experiencing homelessness to medical appointments, paying for shelter to isolate individuals who have contracted coronavirus from other program participants and people experiencing homelessness, providing rental assistance to those who are at risk of losing their housing, have already become homeless, or continue to

experience homelessness due to the economic downturn caused by coronavirus, and providing hazard pay to recipient or subrecipient staff who put their health at risk to continue to provide necessary services to individuals and families experiencing and risk of homelessness.

Private nonprofit organization: A private nonprofit organization that is a secular or religious organization described in section 501(c) of the Internal Revenue Code of 1986 and which is exempt from taxation under subtitle A of the Code, has an accounting system and a voluntary board, and practices nondiscrimination in the provision of assistance. A private nonprofit organization does not include a governmental organization, such as a public housing agency or housing finance agency.

Program income: Because ESG-CR program income cannot be used as match without the ESG matching requirement, HUD is waiving the ESG provisions for program income under [24 CFR 576.2](#) and [576.407\(c\)\(1\)](#) and establishing alternative requirements, as follows:

- Program income is defined as provided by [2 CFR 200.80](#), except that:
 1. Program income includes any amount of a security or utility deposit returned to the sub-recipient, as provided by 24 CFR 576.2; and
 2. Costs that are incidental to generating program income and not charged to the ESG-CR grant or sub-grant may be deducted from gross income to determine program income, as allowed under [2 CFR 200.307\(b\)](#).
- As allowed under 2 CFR 200.307(e), program income may be treated as an addition to the sub-recipient's sub-grant, if the income is generated by the sub-recipient's activities, provided that the program income is used in accordance with the purposes and conditions of that grant or sub-grant. Program income otherwise must be deducted from allowable costs as provided by 2 CFR 200.307(e)(1).

Program participant: An individual or family who is assisted under ESG program.

Program year: The consolidated program year established by the recipient under 24 CFR part 91.

Recipient: Any State, territory, metropolitan city, or urban county, or in the case of reallocation, any unit of general purpose local government that is approved by HUD to assume financial responsibility and enters into a grant agreement with HUD to administer assistance under this part.

Rehabilitation: Labor, materials, tools, and other costs of improving the building, including repair directed toward an accumulation of deferred maintenance; replacement of principal fixtures and components of existing buildings; installation of security devices; and improvements through alterations or incidental additions to or enhancement of, existing buildings including improvements to increase the efficient use of energy. Rehabilitation includes the conversion of a building to an emergency shelter where the costs of conversion and any rehabilitation do not exceed 75 percent of the cost of the building before rehabilitation, and includes structural changes necessary to make a facility accessible to persons with physical handicaps. The facility must be used as an emergency shelter for a period of not less than three years after the ESG contract is closed or the applicant may be required to repay grant funds.

SAGE: the online portal for the submission of aggregate, de-identified data from HMIS or comparable databases via a Comma Separated Value (CSV) import. As of October 1, 2017, The Office of Housing and Urban Development (HUD) now requires all ESG subrecipients to upload their CAPER report from HMIS into this database. SAGE replaces the former eCart database system. All Applicants who receive ESG funds will be required to upload Performance Report data to the SAGE System.

VSPs are not exempt from providing required aggregate data to upload into SAGE. The comparable system that VSPs are using must be able to create a CSV file needed to upload to the SAGE system.

The SAGE ESG CAPER Guidebook for ESG-funded Programs can be found at:

<https://www.hudexchange.info/resources/documents/Sage-ESG-Caper-Guidebook-for-ESG-funded-Programs.pdf>.

SAM Registration: Register your Business with the System of Award Management (SAM). You need to register your business (non-profit) with the federal government's SAM, the primary database of vendors doing business with the federal government. This registration is sometimes referred to as "self-certifying" your small business.

Subrecipient: A unit of general purpose local government or private nonprofit organization to which a recipient makes available ESG funds.

System for Award Management (SAM): The System for Award Management (SAM) is a Federal Government owned and operated free website that consolidates the capabilities in Central Contractor Registration (CCR)/FedReg, Online Representations and Certifications Applications (ORCA) and the Excluded Parties List System (EPLS).

Temporary Emergency Shelter: Any structure or portion of a structure, which is used for a limited period of time because of a crisis, such as a natural disaster or public health emergency, to provide shelter for individuals and families displaced from their normal place of residence or sheltered or unsheltered locations. Examples of temporary emergency shelters include:

- an overnight, daytime, or 24-hour shelter in which program participants are only provided a safe place to sleep, rest, bathe, and eat;
- a shelter where one or more services are made available on-site, whether by shelter staff or contractors or through a memorandum of understanding with another subrecipient or service provider; and
- a shelter designed to facilitate the movement of homeless individuals and families into permanent housing within a fixed period of time (e.g., within 12 months) and employs or contracts with one or more case managers or service providers to provide services as specified under sections III.E.3.a.(i)(e) and III.E.3.a.(ii)(e) through (h) of the ESG-CV Notice.

Transitional Housing: Facility-based or scattered-site temporary housing combined with essential services, with occupancy typically limited to 24 months. The applicant would administer the transitional housing activities and establish eligibility for occupants. Transitional Housing is an eligible activity under the Continuum of Care Grant funds only. Transitional housing also functions to do the following:

- Assist homeless families and individuals the overcome the problems/conditions that made them homeless;
- Increase skills and/or income and aid in obtaining and remaining in permanent housing; and
- Provide or coordinate, as required, substance abuse services, mental health services, daycare, life skills training, educational services and/or family support.

Transitional Housing, as compared to a general shelter, implies a greater level of responsibility in that residents typically maintain their own home or apartment without 24-hour supervision, while at the same time receiving essential services from the administrators of the facility, or from a contracted service provider. These services function to teach each resident the necessary skills in order for them to move to permanent housing and independent living. Individual rehabilitation plans are also emphasized over a group treatment approach.

Underserved Populations: Includes populations underserved because of geographic location, underserved racial and ethnic populations, populations underserved because of special needs (such as language barriers, disabilities, alienage status, or age), and any other population determined to be underserved by the Secretary, as appropriate.

Unit of local government: means any city, county, town, township, parish, village, or other general purpose political subdivision of a State.

Value of building: The monetary value assigned to a building by an independent real estate appraiser or as otherwise reasonably established. If the value of the building is established other than by an appraisal, ODOC must be advised and provided with written documentation of the method for determining the value.

Victim Service Provider: A private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, battered women's shelters, domestic violence transitional housing programs, and other programs.

Victim Services: Services that assist domestic violence, dating violence, sexual assault, or stalking victims, including services offered by rape crisis centers and domestic violence shelters, and other organizations, with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking.