



City of Atlanta
Department of Grants and Community Development
Emergency Solutions Grant Program Guidebook

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Guidance for the Emergency Solutions Grant (ESG) Program as administered by the
City of Atlanta Department of Grant and Community Development

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City of Atlanta Department of Grants & Community Development

Mission

The mission of the Department of Grants and Community Development (DGCD) is to further affordable, equitable, and resilient communities throughout Atlanta.

Vision

The City of Atlanta has a vibrant culture, booming economy, and welcoming spirit. DGCD seeks to provide opportunities within the City for all Atlantans to prosper. Our work is done through the investment of grant funds, seeking to serve the most vulnerable residents, and strengthen our communities.

Shared Principles

Be Stewards - *We commit to making data driven, strategic investments in our communities by leveraging our federal resources responsibly and thoughtfully. We commit to bring a high-level of professionalism and knowledge to our work, holding ourselves and one another accountable to ensuring collective success.*

Serve One Another and Our Partners – *We strive to provide positive, high-quality and responsive service to all internal and external stakeholders, understanding they are critical to accomplishing our collective goals.*

Earn Trust Every Day – *We never compromise our integrity and believe in openness and transparency.*

Seek to Continue Growing and Learning – *We understand the necessity to be forward-looking and flexible as our profession adapts and search out ways to be on the leading edge.*

DGCD Entitlement Programs

DGCD was formed to strengthen the delivery of grant programs City-wide and serves as the lead entity in preparing and implementing the City's federal entitlement and competitively awarded grant programs. The City of Atlanta is the recipient of four (4) annual entitlement grants from the U.S. Department of Housing and Urban Development (HUD) including: Community Development Block Grant (CDBG); the HOME Investment Partnership program (HOME); the Emergency Solutions Grants (ESG); and the Housing Opportunities for Persons With AIDS (HOPWA) program.

CDBG funding is designated to address a variety of services and needs, with a portion covering community development needs such as neighborhood stabilization, code enforcement, public infrastructure improvements, and economic development.

HOME funding is used as production tool to address affordable housing for low-income households.

ESG funding provides homeless assistance and homeless prevention.

HOPWA funding is designated to housing and related supportive services for low-income persons living with HIV/AIDS.

Subrecipient Requirements

DGCD has developed the following standards for aiding with Emergency Solutions Grants (ESG) funds for subrecipients. The Continuum of Care (CoC) regulations, Emergency Solutions Grant (ESG) rules and regulations, and the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act all require DGCD, in consultation with the recipients of ESG program funds within the geographic area, to have written policies and procedures that provide guidance to local providers in delivering ESG funded assistance.

These standards are not intended to be used in lieu of the Interim Regulations for the HEARTH Act, rather, they are intended to establish and clarify local decisions regarding program administration. Each ESG funded service provider shall comply with the minimum standards established by DGCD although each provider may elect to set standards on their provision of ESG that exceed these minimum requirements if such standards do not conflict with this document.

Subrecipients must have established standard accounting practices including internal controls, fiscal accounting procedures and cost allocation plans. Subrecipients must also track agency and program budgets including revenue sources and expenses.

Subrecipients with outstanding audit findings, IRS findings, DGCD monitoring findings, or other compliance issues are not eligible to receive funding. Subrecipients will not be eligible to receive allocations if any of these conditions occur within the grant period. DGCD will work with subrecipients where appropriate, to resolve findings and compliance issues.

Threshold Requirements

All proposed subrecipients are required to submit one of the following financial documents at the time of application and annually thereafter: Financial Statement*; Reviewed Financial Statement prepared by an independent Certified Public Accountant (CPA); Audited Financial Statement prepared by an independent CPA; OR dan OMB A-133 Audit (Single Audit) prepared by an independent CPA. See the table below to determine which document your organization is required to submit.

The threshold requirements outlined below are the minimum standards required by DGCD. All organizations funded by DGCD are encouraged to seek the highest level of financial management review to ensure practices and procedures are fully examined and evaluated.

Threshold Requirement	Document
Total annual expenditures ≤ \$100,000 regardless of source	Financial Statement prepared by organization (does not require preparation by an Independent Certified Public Accountant (CPA))
Total annual expenditures between \$100,001 and \$300,000 regardless of source	Reviewed Financial Statement prepared by an Independent CPA
Total annual expenditures > \$300,000 regardless of source	Audited Financial Statement prepared by an Independent CPA
Federal expenditures ≥ \$750,000	2 CFR 200 Subpart F Audit – prepared by an Independent CPA

Organizations shall file the required financial document with the City of Atlanta’s designee within nine (9) months after the organization’s fiscal year end. Annual single audits must be uploaded to the federal audit clearinghouse.

Data Universal Numbering System (UEI)

All subrecipients are required to register to obtain a Data Universal Number System (UEI) Number. A Data Universal Numbering System is a unique nine-digit identifier for businesses and is the first step in receiving ESG funding. The federal government uses the Data Universal Number System to track how federal money is allocated. You should contact your grant administrator, financial department, chief financial officer, or authorizing official to identify your organization’s Data Universal Number System. If your organization does not yet have a Data Universal Number System, visit the website here and have all the information listed below:

- Name of organization
- Organization address
- Name of the Chief Executive Officer (CEO) or organization owner
- Legal structure of the organization (e.g., corporation, partnership, proprietorship)
- Year the organization started
- Primary type of business
- Total number of employees

System for Award Management (SAM)

The System for Award Management (SAM) requires an active registration for any organization doing business with the Federal Government. As such, DGCD requires that all subrecipients possess an active SAM.gov registration. If your organization is not yet registered in SAM visit their website here and have all the information listed below:

- Data Universal Number System legal business name
- Physical address from your DUNS and Bradstreet record
- Taxpayer Identification Number (TIN)
- Taxpayer name associated with your TIN
- Bank routing number, account number and bank account type to setup an Electronic Funds Transfer (EFT)

Georgia Registration and License

All subrecipients must be registered and licensed to do business in the State of Georgia. Verification of active business license is required by the City of Atlanta Department of Grants Community Development.

Advancing Equity Through Procurement

Subrecipients shall be committed to furthering the City of Atlanta’s vision of building an affordable, resilient and equitable Atlanta. A five-year analysis of the Atlanta Continuum of Care demonstrated that Black people are overrepresented in homelessness (87.5%) and experience deep poverty at an alarming rate (75.7%). DGCD realizes that federal requirements for being a subrecipient or sub-subrecipient can be difficult for organizations to meet the first time. However, DGCD remains committed to fostering partnerships with a diverse group of vendors, specifically such organizations led by and serving communities that have been underrepresented or poorly served and those organizations located in or deeply connected to

areas with significant populations of Black, Indigenous or other persons of color. DGCD is prepared to support the successful onboarding of new providers through additional training, support, capacity building, ongoing technical assistance, and monitoring preparation.

Subrecipients

A subrecipient is any unit of general-purpose local government or private nonprofit organization to which a recipient awards ESG grant funds. Eligible subrecipients are otherwise eligible organizations. These are the organizations that DGCD contracts with for the provision of eligible activities. These organizations are identified during the grant application process and are designated as the:

- Service Provider(s)
- Service Coordinator, and/or
- Fiscal Agent

Service Provider

A service provider is an eligible organization, that is selected during the DGCD's grant application cycle, whose primary mission is to provide direct services through one or more of the established ESG program components.

Service Coordinator

One or more service providers may collaborate to provide specific services. In this case, DGCD will consider contracting with the service coordinator. The service coordinator is a service provider within the collaboration. The application must clearly explain how the service providers will work together, and written agreements are required between services providers involved in the coordinated effort. Copies of related written agreements or Memoranda of Understanding (MOUs) must be submitted as an attachment with the application. The service coordinator assumes full responsibility for meeting all HMIS, reporting, record keeping, expenditure, and other programmatic requirements. These responsibilities include monitoring each service provider providing any services or activities funded through the application process. This role is limited to organizations with demonstrated capacity.

Fiscal Agent

DGCD will consider contracting with organizations as fiscal agents. In this case, the organization does not directly provide any services covered by the DGCD contract, however, all reimbursements, documentation requirements, and other program responsibilities must be maintained by the fiscal agent. The fiscal agent assumes full responsibility for meeting all HMIS reporting, record keeping, expenditure, and other programmatic requirements. These responsibilities include monitoring each service provider providing services or activities funded through the application process. This role is limited to organizations with demonstrated capacity.

Participation in Point-in-Time Count/Housing Inventory Count

Each subrecipient awarded funding under the Emergency Shelter Operations and/or Rapid Re-housing components must participate in the annual Point-In-Time (PIT) Count and Housing Inventory Count (HIC) on the date designated by the City of Atlanta Continuum of Care (GA-500).

Participation in Continuum of Care (CoC)

Participation in accordance with the Atlanta Homeless Continuum of Care (AHCOC) governance charter is required of all ESG subrecipients.

Engaging Persons with Lived Expertise

Subrecipients are required to demonstrate how the organization will intentionally and thoughtfully incorporate people with lived expertise of homelessness into the planning, design, implementation, continuous quality improvement, and decision-making processes.

Ensuring Compliance with Federal and City Non-Discrimination Requirements

DGCD requires that all subrecipients and sub-subrecipients of ESG Program funds, comply with the non-discrimination and equal opportunity provisions of Federal civil rights laws as specified at 24 CFR 5.105(a), including, but not limited to the following:

- **Fair Housing Act:** prohibits discriminatory housing practices based on race, color, religion, sex, national origin, disability, or familial status.
- **Equal Access to HUD-Assisted or Insured Housing:** prohibits housing discrimination based on actual or perceived sexual orientation, gender identity, or marital status.
- **Section 504 of the Rehabilitation Act:** prohibits discrimination because of disability under any program or activity receiving Federal financial assistance.
- **Title VI of the Civil Rights Act:** prohibits discrimination based on race, color or national origin under any program or activity receiving Federal financial assistance; and
- **Title II of the Americans with Disabilities Act:** prohibits public entities, which includes state and local governments, and special purpose districts, from discriminating against individuals with disabilities in all their services, programs, and activities, which include housing, and housing-related services such as housing search and referral assistance.
- **Title III of the Americans with Disabilities Act:** prohibits private entities that own, lease, and operate places of public accommodation, which include shelters, social service establishments, and other public accommodations providing housing, from discriminating because of disability.

In addition, DGCD requires that all subrecipients and sub-subrecipients of ESG Program funds comply with the nondiscrimination and equal opportunity provisions established by the City of Atlanta ordinance, which make it unlawful to:

- Discriminate because of race, color, creed, religion, sex, disability, domestic relationship status, parental status, familial status, sexual orientation, national origin, gender identity, age, or use of a trained dog guide by a blind, deaf or otherwise physically disabled person.

In addition, DGCD ensures compliance with the nondiscrimination, and equal opportunity provisions established by City of Atlanta ordinance and all nondiscrimination and equal opportunity provisions of Federal civil rights laws as specified at 24 C.F.R. 5.105(a).

The City of Atlanta **Human Relations Commission (HRC)** receives, investigates, and conciliates complaints — free of charge — from those who believe they have been victims of unlawful

discrimination. The Commission's investigative and hearing processes usually result in complaints resolution. If necessary, an aggrieved person may seek prosecution of alleged violations of the Human Relations Code in Atlanta Municipal Court. Individuals who believe they have been subject to unlawful discrimination or retaliation can file a complaint with the Human Relations Commission.

Ensuring Compliance with Fair Housing

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), which provides for fair housing and prohibits discrimination based on race, color, religion, gender, or national origin in the sale, rental, or financing of housing.

All housing projects operating within the City and serving people experiencing and/or at-risk of homelessness are required to comply with Fair Housing regulations. This includes reporting fair housing impediments to the Consolidated Plan jurisdiction and providing participants with information on their rights under Federal, State and City laws and on remedies available to them if they believe their fair housing rights have been violated.

DGCD requires full compliance with the requirements of the Americans with Disabilities Act and all grant services and activities must be accessible to people with disabilities. In addition, all people in the City, regardless of what HUD defined population(s) or subpopulation(s) they may fall under, have access to the same services through ESG funded activities. This includes single adults, families with children, families without children, emancipated youth under 18, young adults, people experiencing chronic homelessness, veterans, people living with substance use disorders, serious mental illness, HIV/AIDS and other disabilities, and survivors of domestic violence.

Equal Access, Prohibited Inquiries and Prohibition Against Involuntary Family Separation

All activities must be made available without regard to actual or perceived sexual orientation, gender identity, or marital status. Subrecipients are prohibited from inquiring about an applicant's or participant's sexual orientation or gender identity for the purpose of determining eligibility or making housing available. This does not prohibit an individual from voluntarily self-identifying sexual orientation or gender identity.

Service providers that make decisions about eligibility for or placement into single-sex emergency shelters or other facilities will place a potential project participant (or current project participant seeking a new assignment) in a shelter or facility that corresponds to the gender with which the person identifies, taking health and safety concerns into consideration. A project participant's or potential project participant's own views with respect to personal health and safety should be given serious consideration in making the placement. For instance, if the potential project participant requests to be placed based on his or her sex assigned at birth, the provider should place the individual in accordance with that request, consistent with health, safety, and privacy concerns. Providers must not make an assignment or reassignment based on complaints of another person when the sole stated basis of the complaint is a project participant or potential project participant's non-conformance with gender stereotypes.

While an emergency shelter or housing project may limit assistance to households with children, it may not limit assistance to only women with children. Such a shelter or housing project must also serve the following family types, should they present, in order remain compliant with the Equal Access rule: Single male head of household with minor child(ren); and any household made up of two or more adults, regardless of sexual orientation, marital status, or gender identity, presenting with minor child(ren).

Further, subrecipients must not discriminate against a group of people presenting as a family based on the composition of the family (e.g., adults and children or just adults), the age of any member's family, the disability status of any members of the family, marital status, actual or perceived sexual orientation, or gender identity.

Under the Equal Access Rule, "family" includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, any group of persons presenting for assistance together with or without children and irrespective of age, relationship, or whether or not a member of the household has a disability. A child who is temporarily away from the home because of placement in foster care is considered a member of the family.

Subrecipients and sub-subrecipients must assess and serve individuals and households as they present. Any group of people that present together for assistance and identify themselves as a family, regardless of age or relationship or other factors, are a family and must be served together as such.

Faith-Based Activities

Organizations funded by DGCD programs (subrecipients and sub-subrecipients) may not engage in inherently religious activities, such as worship, religious instruction, or proselytization as part of the programs or services funded under ESG. If an organization conducts these activities, then they must be offered separately, in time or location, from the programs or services funded under ESG and participation must be voluntary for project participants.

An organization receiving ESG funding shall not discriminate against a participant or prospective participant based on religion or religious beliefs. ESG funding shall not be used for the rehabilitation of structures used specifically for religious activities but may be used for rehabilitating structures that are used for ESG eligible activities.

Confidentiality

All subrecipients and sub-subrecipients shall establish written procedures to ensure records that contain project participant personally identifiable information (PII) remain confidential. PII includes a participant's name, address, social security number, telephone number, email address, ID, etc. Written procedures should, at a minimum, include:

- How confidential information will be gathered, recorded, and stored
- The consent process for the release of confidential information
- Protocols for responding to breaches of confidentiality
- Standards contained in relevant state and federal laws, including HIPAA compliance (if applicable) and HIV confidentiality statutes
- Privacy standards related to data collection and use of participant information for program reporting, such as HMIS

All subrecipients understand that client information collected under this Agreement is private and the use or disclosure of such information, when not directly connected with the administration of the Grantee's or Subrecipient's responsibilities with respect to services provided under this Agreement, is prohibited unless written consent is obtained from such person receiving services and, in the case of a minor, that of a responsible

parent/guardian. The Subrecipient also shall maintain a confidentiality process including a policy governing the HUD and the City's local internal policy mandates.

Client Grievance and Termination Policy

Client receiving assistance must receive written notification of the subrecipient's grievance policy. Grievance policies must be approved by the Board of Directors and provide specific protocols for any disputed decision affecting assistance. Project participants contacting DGCD directly will be referred to the subrecipient's grievance policy. The subrecipient must be prepared to provide documentation of the grievance record for all project participant grievances. DGCD will review all grievance policies during the DGCD monitoring process.

DGCD subrecipients may terminate assistance to a program participant who violates program requirements only after written notice of corrective action has been given to the participant. In terminating assistance to a program participant, the subrecipient must:

- (1) Provide written notice to the program participant containing a clear statement of the reasons for violation/termination;
- (2) Provide review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision,
- (3) Provide prompt written notice of the final decision to the program participant; and
- (4) Written policy for handling surviving family members, in the event of a death of a head of household that establishes a reasonable grace period of continued assistance to surviving family members, not to exceed one year, measured from the date of death of the participant.

Recordkeeping

The Subrecipient shall maintain such records and accounts as are deemed necessary by the City of Atlanta and HUD in accordance with 2 CFR Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* to assure a proper accounting for all project funds. The Subrecipient shall, as often as deemed necessary by the City, HUD or the Office of the Inspector General of the United States, permit the City, HUD, the Office of the Inspector General or any of their duly authorized representatives to have full access to and the right to examine any pertinent books, documents, papers, and records of the Subrecipient.

Subrecipients must keep any records and submit any reports (including those pertaining to services received, project participant housing status, race, ethnicity, gender, and disability status data) that DGCD requires within the specified timeframe. All contractual and project participant records must be maintained for at a minimum of five years. Records include both program records such as the documentation or match requirement, financial records such as bank statements, and project participant records. Copies of bank statements or expenses associated with the project participant must also be retained. Subrecipients are required to maintain a record of all project participants that are screened and classified as ineligible for a service provided within the continuum of care. This must include documentation of the reason for the determination of ineligibility. For more information about documentation requirements see Accounting Standards.

Data Reporting and Performance Reports Requirements

Reports must be submitted as requested by DGCD. Reports will also be required at the CoC level. Timeliness is critical, as this data will be aggregated for other reporting purposes. Subrecipients that fail to meet reporting requirements and deadlines are considered non-compliant which may affect future reimbursements and other DGCD funding opportunities.

Performance reports as mandated by the City of Atlanta's Consolidated Planning process including the Consolidated Annual Performance and Evaluation Report (CAPER) in accordance with 24 CFR 574.520(a), and Annual Action Plans (AAP) and other associated reports in federal regulatory reporting mandates as required.

Subrecipients must ensure that data is complete and accurate. Each subrecipient is expected to enter all project participant data into the Homeless Management Information System (HMIS), complete regular data quality checks, and work with the HMIS administrator to ensure that complete quality data is submitted to DGCD by the specific due dates. Subrecipients primarily serving survivors of domestic violence and sexual assault must meet these requirements using a comparable database.

Subrecipients must be able to track and report program activities, project participant data, and spending separately from other activities. Subrecipients will report on outputs, such as the number of persons served and the demographic characteristics of persons served, program funds expended by activity type, as well as outcomes related to housing stability. Most reporting elements will be generated from HMIS data. Adherence to required HMIS data standards will be essential to performance reporting.

Closeout reports including a final performance report, inventory of all property acquired or improved by federal funds, and final financial reports, upon termination or completion of the award.

Homeless Management Information System (HMIS)

The Homeless Management Information System (HMIS) is used to record client information that is shared among service providers who serve people experiencing homelessness, to increase efficiencies and better meet client needs. The Atlanta CoC partners with eight other CoCs in Georgia to use the HMIS application, ClientTrack. This partnership allows the CoCs to share information about people served to communicate and coordinate client-centered support.

DGCD subrecipients or any proposed subrecipients are required to work with the Atlanta CoC to coordinate access to HMIS and technical assistance. Subrecipients are required to report project participant-level data in HMIS. The required data elements that are collected in HMIS are included in the 2021 HMIS Data Standards. Domestic violence services providers not using HMIS must use a comparable system that meets all HMIS data standards and reporting requirements.

Definition of Homeless, At Risk of Homelessness, and Chronic Homelessness

Homeless Definition

The HUD homeless definition contains FOUR categories:

Category 1 – Literally Homeless: Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- (i) Has a primary nighttime residence that is a public or private place not meant for human habitation;

- (ii) Is living in a 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, and local government programs); or
- (iii) Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Category 1 clients qualify for emergency shelter, transitional housing, rapid re-housing, and supportive services only projects. Category 1 clients qualify for street outreach, provided that the individual or family must be living on the streets (or other places not meant for human habitation) and be unwilling or unable to access services in emergency shelter).

Category 2 – Imminent Risk of Homelessness: Individual or family who will imminently lose their primary nighttime residence, provided that:

- (i) Residence will be lost within 14 days of the date of application for homeless assistance;
- (ii) No subsequent residence has been identified; and
- (iii) The individual or family lacks the resources or support networks needed to obtain permanent housing Category 2 clients qualify for emergency shelter and prevention.

Category 3 – Homeless Under Other Federal Statutes: 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:

- (i) Are defined as homeless under the other listed federal statutes listed below;
- (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;
- (iii) Have experienced persistent instability as measured by two moves or more during the preceding 60 days; and
- (iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers.

For the purposes of this definition, other federal statutes for defining homelessness include:

- 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)

Category 3 clients qualify for emergency shelter. Category 3 clients qualify for prevention, provided that the individual or family must have an annual income below 30% of AMI.

Category 4 – Fleeing/Attempting to Flee Domestic Violence: Any individual or family who:

- (i) Is fleeing, or is attempting to flee, domestic violence;

- (ii) Has no other residence; and
- (iii) Lacks the resources or support networks to obtain other permanent housing

Category 4 clients qualify for emergency shelter and homelessness prevention. Category 4 clients qualify for street outreach and rapid re-housing, provided that the individual or family also meets the criteria for Category 1 above.

At Risk of Homelessness Definition

To meet the definition for at risk of homelessness, the individual or family must meet two threshold criteria and must exhibit one or more specified risk factors. The threshold criteria and risk factors are below. The individual or family must:

- (i) Have income below 30 percent of median income for the geographic area; AND
- (ii) Have insufficient resources immediately available to attain housing stability. (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 category 1 of the homeless definition; AND
- (iii) Meet at least one of the following conditions:
 - a. Has moved frequently because of economic reasons--“2 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 21 days after the date of application.
 - d. Lives in a hotel or motel; [“and the cost of the hotel or motel is not paid for by federal, state, or local government programs for low-income individuals or by charitable organizations.”]
 - e. Lives in severely overcrowded housing; [in a single-room occupancy or efficiency apartment unit in which more than two persons, on average, reside or another type of housing in which there reside more than 1.5 persons 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, mental health facility, foster care or other youth facility, or correction program or institution.]
 - g. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness.

The DCA Consolidated Plan describes housing characteristics linked with instability and an increased risk of homelessness in the following way:

For the purposes of Georgia's Consolidated Plan, the number of households with incomes below 30% of the median family income and who spend more than 50% of their income on housing is used as a proxy for the number of households threatened with homelessness. This proxy matches the statistics indicating that most households, immediately prior to becoming homeless, spend as much as 70% of their income

on housing. Extremely low-income households threatened with homelessness require a variety of supportive services to meet their respective needs, including rental/mortgage assistance; security deposit and utility assistance; financial management counseling; landlord-tenant counseling; day care; job counseling; substance abuse counseling; and medical services.

Chronic Homelessness Definition

Chronically homeless means:

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

ESG Service Applicants’ Intake, Eligibility Assessment, and Re-Certification into the ESG Program

All ESG service applicants must participate in an initial consultation to assess needs and to determine program eligibility. The consultation will include verification of homelessness or at risk of homelessness status, assessment of barriers to housing stability, and collection of all relevant HMIS data elements. The Coordinated Intake/Assessment system selected within each Continuum of Care will determine more specific requirements for the intake process.

Sub-grantees will complete the following procedures:

- Check HMIS (or HMIS comparable database) to determine if the applicant is currently receiving assistance from any other federal funding sources. Clients cannot receive funding for duplicate services at the same time. A printed HMIS screen can be used as documentation in the applicant’s file.
- Collect the required ESG documentation (evidence to establish and verify the client’s housing status; copy of documentation to establish annual income; certification that client has insufficient support networks; etc.) as relevant.
- Case Manager will record required HMIS data in the ClientTrack system (or HMIS comparable database) for all program participants.

- If client is not eligible for ESG, ESG sub-grantees are required to include documentation regarding reasons for non-eligibility and to identify other appropriate service providers within the Continuum that can more effectively meet the applicant's needs.

Eligibility Assessment for Emergency Shelter, Transitional Housing, Street Outreach, Supportive Services Only, and Hotel/Motel Vouchers Projects

Eligibility for these programs requires a verification of homelessness for the appropriate category of HUD's homeless definition. See previous sections on HUD's homeless definition and documenting housing status. There are no income requirements for emergency shelter, transitional housing, outreach, supportive services only, or hotel/motel voucher sub-grants.

Eligibility Assessment for Rapid Re-Housing and Prevention

Eligibility for these programs requires a verification of homelessness for the appropriate category of HUD's homeless definition. Prevention participants may also qualify with verification of meeting HUDs at risk of homelessness definition.

Note that while households exiting transitional housing technically do qualify for rapid re-housing assistance, HUD cautions against using ESG rapid re-housing as a way of regularly exiting households from transitional housing to permanent housing. This is because rapid re-housing is a model for helping people move from the streets or shelter to permanent housing and is not intended for people exiting transitional housing. HUD recommends that this be done on a case-by-case basis, and only when necessary to prevent the program participant from going back to the streets or emergency shelter.

To qualify for Rapid Re-Housing assistance, household income must be **at or below 50 percent** of the Area Median Income (AMI) for the geographic area. To qualify for Prevention assistance, household

To qualify for Prevention assistance, household income must be **at or below 30 percent** of the Area Median Income (AMI) for the geographic area.

Area Median Income is defined by HUD and updated annually. The most recent guidelines should be used each year. The following site can be accessed to determine AMI:

<https://www.huduser.gov/portal/datasets/il.html>

Documentation that applicants meet income eligibility guidelines is required for rapid re-housing and prevention. Total household income should include allowable sources from all household members.

Income Calculations and Changes

Income calculations are modeled after the requirements for the HOME Investment Partnership program (24 CFR 92.508) and other HUD regulations. Guidance is located at the following website:

<https://www.gpo.gov/fdsys/pkg/CFR-2011-title24-vol1/pdf/CFR-2011-title24-vol1-sec92-508.pdf>

For information on income inclusions and exclusions, see the following website for guidance:

<https://www.hudexchange.info/resource/5180/part-5-section-8-income-inclusions-and-exclusions/>

The sub-grantee must require each program participant receiving rapid re-housing or homelessness prevention assistance to notify the sub-grantee regarding changes in the program participant's income or

other circumstances (e.g., changes in household composition) that affect the program participant's eligibility for assistance under ESG. When notified of a relevant change, the grantee must re-evaluate the program participant's eligibility, and the amount and types of assistance the program participant needs.

Recertification Requirements

Re-Certification determines whether an individual or family is still eligible for a project and is required for **all rapid re-housing and prevention** projects. It occurs:

- Every 90 days after the project enrollment date, **AND**
- Annually for those enrolled in the project one (1) year after the initial enrollment date.

Assistance beyond 90 days may not be issued until 90-day re-certification is complete. Assistance beyond one year may not be issued until annual re-certification is complete.

Rapid Re-Housing Re-Certification Requirements

90-day recertification for rapid re-housing includes determination that the household:

- 1) Is at or below 50% AMI; **AND**
- 2) Is at risk of returning to homelessness; **AND**
- 3) Lacks the financial resources and support networks needed to obtain housing or remain in their current housing.

Annual re-certification for rapid re-housing includes determination that the household:

- 1) Is at or below 30% AMI**; **AND**
- 2) Is at risk of returning to homelessness; **AND**
- 3) Lacks the financial resources and support networks needed to obtain housing or remain in their current housing.

****NOTE: FOR RAPID RE-HOUSING ANNUAL RE-CERTIFICATIONS, HOUSEHOLDS MUST HAVE AN INCOME BELOW 30% AMI. THIS IS REQUIRED BY LAW AND IS DIFFERENT FROM THE ELIGIBILITY AND 90 DAY RE-CERTIFICATION CRITERIA**

Prevention Re-Certification Requirements

90 day and annual re-certifications for prevention includes determination that the household:

- 1) Is below 30% AMI; **AND**
- 2) Remains at-risk of homelessness; **AND**
- 3) Lacks the financial resources and support networks to remain in their housing.

Become a Vendor with the City of Atlanta – Method of Payment

Each new City of Atlanta DGCD's Subrecipient must register as a vendor with the City of Atlanta. To register as a vendor with the City of Atlanta and receive electronic funds transfer (EFT) payments, the agency should be a "Spend Authorized Supplier" in "Supplier Central" through the City of Atlanta Department of Procurement. To register as a **Spend Authorized Supplier**, click here. A signed IRS Form W-9 is required for registration and will enable an organization to submit quotes, bids, or proposals as well as receive purchase orders and create/submit invoices. Registration typically takes 5-10 business days to review.

Financial Management

Subrecipients must maintain compliance with regulations and requirements in the following areas of financial management:

- Allowable costs
- Source documentation
- Internal controls
- Budget controls
- Cash management
- Cost allocation plans
- Accounting records
- Procurement
- Property asset controls
- Audits

Based on regulations from the HUD's Office of Management and Budget (OMB) at **2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards**, including requirements for financial management, property management, reasonable and allowable costs, procedures for negotiation, approval of indirect cost rates, procurement standards, reports and records, and guidelines for audits of non-profit organizations receiving federal assistance of \$750,000 or more.

Subrecipients must only use funds for eligible activities and in accordance with the DGCD-approved program budget. Any changes from the planned expenditures must be approved in advance by DGCD. Funds may not be used for activities other than those authorized in the guidelines and approved by DGCD. Reimbursements are based on the date the payment is made by the subrecipient. All expenditures must be in accordance with program conditions such as funding ceilings and other limitations on eligible costs.

Internal controls refer to the combination of policies, procedures, defined responsibilities, personnel, and records that allow an organization to maintain adequate oversight and control of its finances. Internal controls reflect the overall financial management system of an organization or agency. Budget controls, cash management, cost allocation plans, accounting records, procurement, and property controls are subsets of the overall financial system.

Subrecipient fiscal and progress reports are routinely required in all written subrecipient agreements. Additionally, a monthly project management report will be maintained with current information on the activity of each ESG funded project. This information will be compiled and maintained by staff on a consistent and regular basis.

In order to ensure DGCD monitoring processes follow the Violence Against Women Act (VAWA), domestic violence service providers must adopt a formal check request policy to ensure appropriate use of grant funds. The subrecipient must use a Check Request form as the primary method of requesting checks or cash in connection with an authorized expense incurred on behalf of grant-funded programs or project participant expenses. Check requests describe the expense, list the amount of the expense, and should follow the following steps:

1. Use a standardized Check Request form to include a description of the expense, the title of the corresponding eligible grant activity, the amount of the expense, and the payee.

2. Get requisite approval from supervisor.
3. Attach receipts and/or invoices. Make sure the amount requested matches the amount to be spent or reimbursed.
4. Submit to appropriate finance personnel who will verify information provided, review back-up documentation, file documentation, and prepare check(s). Once filed, the Check Request forms and attached receipts and/or invoices must have any project participant-level personally identifying information redacted.

All check requests must have at least two signatures: the requestor and the authorizer. The authorizing signature must be a director or manager that has budgetary oversight for the program incurring the expense. All significant (over \$5,000), unusual, and nonrecurring transactions must be reported to the CEO.

Advances

HUD's Policy on Advances is as follows:

For service providers that have limited capital, under some circumstances, cash advances are permitted in lieu of reimbursements under the ESG and CoC programs. For recipients and subrecipients that are able to meet the requirements in 2 CFR 200.305, it is not necessary for all costs to be incurred prior to receiving advanced funds.

Cash advances to a subrecipient must be limited to the minimum amounts needed and in accordance with the actual, immediate cash requirements of the organization in carrying out the approved activities of the project. Cash advances cannot be a portion of the contracted award amount each month. If the recipient or subrecipient does not meet the requirements of 2 CFR 200.305, then cost reimbursement is the preferred method of payment for subrecipients.

City of Atlanta Department of Grants Community Development's policy on Advancements are as follows: Check for updates with COA's DGCD

This policy and procedure apply to all City of Atlanta grant user departments and Subrecipients (SR) (Project Sponsor, CHDO, and Developer/Non-Profit) who receive sub awards of federal funds from the City of Atlanta Department of Grants and Community Development. This policy and procedure provide information on requesting, reviewing, approving or denying, and requirements for managing advance payments for federal funds. Advance payment means a payment the City would make to the subrecipient "in advance" of expenditures being made. The City will make a determination on a case by case basis.

Subrecipients of grants awarded by the City of Atlanta are primarily paid on allowable expenditures incurred by the subrecipient and submitted for reimbursement on the appropriate Request for Disbursement Form. The reimbursement method ensures that expenditures have been both obligated and liquidated by the time the funds are transferred from the City to the subrecipient. The reimbursement method is the most common method used. Subrecipients are expected to be financially self-sustaining for minimum of 90 days to be eligible as a Subrecipient. Subrecipient are also to be responsible possessing the ability to perform successfully under the terms and conditions of this policy. This circumstance follows the Uniform Grant Guidance 2 CFR 200, which directs those advance payments must be limited to the minimum amounts needed by the subrecipient and be timed to cover the actual, immediate cash requirements in carrying out the grant program.

Time Sheets and Payroll Summary

Employee time sheets must reflect actual hours (not percentages) worked based on the cost allocation plan. Time sheets must be signed and dated by the employee and the supervisor with first-hand knowledge of the work performed or equivalent electronic approval. If the expenditures are paid for by more than one source (e.g., federal, public, private) the split costs should be accurately tracked within the sub recipient's accounting system.

Payroll Summary Report or Payroll Register from the sub recipient's third-party payroll processor. Ensure that all staff, for which reimbursement is being requested, are referenced within the report.

Accounting Standards

In addition to establishing a system of accounting to accurately record and report transactions, adequate source documentation must be maintained as support for these transactions. Source documentation includes but is not limited to the following:

- Purchase Requisitions
- Purchase Orders
- Contracts
- Contract Invoices
- General Ledger
- Bank Statements
- Cancelled Checks (reviewed during monitoring)
- Draw downs
- Payment Vouchers
- Employee Time Sheets
- Travel Advance Requests
- Travel Reimbursement Vouchers
- Vendor Invoices
- Journal Voucher Entries
- Cash Receipts
- Additional documentation may be requested

All source documents must be coded by a reference number so that a clear link exists between the fiscal records and these documents. Coding could include the check number used to make the payment, the journal entry in which transaction was recorded or the page number from the cash receipt journal. Purchase order numbers and payment voucher numbers may also be used to provide the necessary audit link.

Monitoring

When conducting monitoring of Service Providers, HUD regulations 24 CFR 84.53(e) and 24 CFR 85.42(e) provide for HUD and its representatives, including grantees, the right to access documentation for the purpose of making audits and/or examinations. Review of client records is, therefore, allowable without specific client consent.

DGCD staff performs in-depth, limited, remote, on-site monitoring or a combination of monitoring types (e.g.: Desk Monitoring and Risk Analysis) at least as necessary to ensure that federal funds are used for authorized purposes in compliance with laws, regulations, DGCD's internal process and the provisions of any subrecipient's executed written contract/agreement and those performance goals are achieved. In general, monitoring will emphasize evaluations of progress, program performance, financial management systems, general management practices, record keeping/reporting and compliance with applicable regulations and procedural requirements. DGCD's Monitoring Guide Policy Manual provides more detailed information on monitoring.

Conflicts of Interest

Subrecipients, sub-subrecipients and partners must have conflict of interest policies that clearly prohibit personal gain or benefit and meet other program requirements.

Organizational Conflicts of Interest

The provision of any type or amount of assistance may not be conditional on an individual's or family's acceptance or occupancy of housing owned by the subrecipient, the sub-subrecipient, a parent organization, or subsidiary. Subrecipients/sub-subrecipients, parent organizations, or subsidiaries may not administer rapid re-housing or prevention assistance and use the assistance for households residing in units owned by the subrecipient/sub-subrecipient, parent organization, or subsidiary. An organization may not both participate in decision-making related to determining eligibility and receive any financial benefit.

A CoC or LPG may request a waiver for an organization to both administer rapid re-housing assistance and place households in units owned by the same organization, a parent organization, or subsidiary where critical local necessity can be demonstrated and where project participant evaluations will be provided by another unrelated organization. Waiver requests must be submitted in writing to DGCD prior to the provision of rapid re-housing assistance specific to the requested waiver. Waivers will not be granted for prevention administrators.

Individual Conflicts of Interest

Individual conflicts of interest apply to any person who is an employee, agent, consultant, officer, or elected or appointed official of the subrecipient or its sub-subrecipient. For the procurement of goods and services, the subrecipient and/or its sub-subrecipient must comply with the agency code of conduct and conflict of interest policies.

Individuals (employees, agents, consultants, officers, or elected or appointed officials of the subrecipient or sub-subrecipient) may not both participate in decision-making related to determining eligibility and receive any financial benefit. This financial benefit may not be received by the specific individual, any member of his/her immediate family or a business interest. The restriction applies throughout tenure in the position and for a one-year period following tenure.

Upon written request of the subrecipient, DGCD may grant an exception to the restrictions in the paragraph above on a case-by-case basis when it determines that the exception will serve to further the goals of the program and promote the efficient use of program funds. In requesting an exception, the subrecipient must provide a disclosure of the nature of the conflict, accompanied by an assurance that there has been public disclosure of the conflict and a description of how the public disclosure was made. In most cases, additional HUD waivers are required.

Property Standards

DGCD provides the Basic Habitability Checklist that must be completed, signed by all required parties, and included in all project participant records for rapid re-housing and prevention (new units only) assistance. The checklist must also be completed for each emergency shelter location and retained in agency administrative records. While the habitability standards do not require a certified inspector, the inspector must meet one of the following criteria:

- Program staff (subrecipient/sub-subrecipient staff); or
- Staff from or hired by an agency of the subrecipient/sub-subrecipient, such as a city department that is designated to conduct inspections, or a contractor hired for that task; or
- Staff from another subsidy program that is helping and requires an inspection (e.g., Section 8, Public Housing).

Habitability standards are different from HUD's Housing Quality Standards (HQS). Housing that is occupied by families with children and that was constructed before 1978 must also comply with Lead-Based Paint inspection requirements, per the Lead Based Paint Poisoning Prevention Act. This requirement applies only to units that a family moves into with assistance. This does not apply to units currently occupied by project participants.

A Lead-Based Paint Visual Assessment form must be completed and included in project participant records. Staff must complete an online training course before performing visual assessments.

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 HOPWA.

HUD's lead-based paint rules apply to all housing units that a family with children moves into with assistance. Specifically, lead-based paint rules apply when:

1. Housing to be assisted was constructed before 1978; and
2. Residents will include a pregnant woman or a child 6 years of age or younger. Note: Studio units are exempt.

All housing meeting the above criteria must receive a lead-based paint visual assessment before assistance may be provided. Staff must complete an online training course before performing visual assessments and retain the certification on file.

Ensuring Effective Communication: Individuals with Disabilities

DGCD requires that ESG subrecipients and sub-subrecipients take the necessary steps to ensure effective communication with individuals with disabilities. This includes providing appropriate auxiliary aids and services necessary to ensure effective communication, such as providing information in appropriate accessible formats as needed including but not limited to sign language interpreters, Braille, audio, large type, and assistive listening devices. Facilities must be accessible to individuals, including physical locations that are accessible for individuals who use wheelchairs.

Ensuring Effective Communication: Individuals with Limited English Proficiency

Pursuant to Title VI of the Civil Rights Act of 1964, DGCD requires that ESG subrecipients and sub-subrecipients take reasonable steps to ensure meaningful access to its programs and activities by individuals with Limited English Proficiency (LEP). This may include providing language assistance or ensuring program information is available in the appropriate languages for the City of Atlanta. HUD's Final Guidance Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons can be found [here](#).

The City of Atlanta is committed to ensuring that no person is excluded from participation in, denied the benefits of, or subjected to discrimination in the receipt of any City services on the basis of race, ethnicity, country of origin, or language. The Language Access Plan, known as iSpeakATL, offers free, timely, and efficient language services to the City's Limited English Proficient (LEP) population. Constituents will be able to receive excellent service in all City buildings and offices, no matter what language they speak.

The City of Atlanta Code of Ordinances Part II, Chapter 94 (20-O-1155) makes it illegal to discriminate based on race, color, religion, ancestry, national origin, place of birth, sex, sexual orientation, familial status, handicap, disability or use of support animals because of the handicap or disability of the user. However, to further ensure access to affordable housing for these protected classes, DGCD subrecipients and sub-subrecipients have a duty to proactively market affordable housing through outreach efforts targeted to those most likely to experience housing discrimination, particularly Black, Indigenous, and other persons of color.

Fair housing protections have been strengthened by the City of Atlanta for its residents to include source of income. Any verifiable source of income or housing assistance paid to or on behalf of a renter including rent subsidy or rent assistance programs must be considered in the same manner as ordinary wage income and households must not be discriminated against based on the source of their income and/or housing assistance. The City of Atlanta Human Relations Commission is authorized to receive complaints to address violations of the City's Fair Housing Code and address discrimination. Individuals who believe they have been subject to unlawful discrimination or retaliation can file a complaint with the Human Relations Commission.

Subrecipients and sub-subrecipients should be familiar with the Georgia Landlord Tenant Handbook to educate participants on basic Georgia residential landlord-tenant law. Cited in the handbook the Application of Fair Housing Act Standards to the Use of Criminal Records by Providers of Housing and Real Estate-Related Transactions notes that a blanket denial of applicants with a criminal record history may amount to discrimination. Landlords partnering with subrecipients are encouraged to remove questions related to criminal background from all housing applications, however, where an assessment of criminal history is included in the application process, circumstances should be considered on a case-by-case basis and should take into consideration factors such as nature, severity, time passed and age of conviction.

Further, participant's housing choice should be fully supported by offering access to housing in a wide array of neighborhoods where traditionally affordable housing may not otherwise be found, including those with access to jobs, transportation, good schools and other amenities that further the health and well-being of participants.

DGCD Ineligible and Prohibited Activities

Ineligible and Prohibited activities include the following:

- Subrecipient past due taxes
- Subrecipient late fees
- Repayment of loans from the project participant to the subrecipient
- Return of utility or security deposits to the subrecipient not tracked as program income
- Construction or rehabilitation
- Project participant credit card bills or other debt (e.g. payday loans or student loans)
- Vehicle repair
- Medical care, dental care and medication
- Drug and alcohol testing
- Clothing and grooming
- Home furnishings
- Pet care
- Renter's insurance
- Payment of third-party security deposits (e.g. surety bonds)
- Entertainment activities
- Project participant work or education materials
- Cash assistance to project participants (including gift cards or gas cards)
- Direct payments made to project participants
- Any payments to ineligible third parties
- Any fees charged to the project applicant or participant
- Employee bonuses

Additional Requirements

DGCD contracts directly with individual organizations or subrecipients. Subrecipients must be non-profits that are current on 990 filings, housing authorities, planning district commissions or units of local government. Planning district commissions and housing authorities are not eligible to receive funding for shelter operations or rapid re-housing activities. However, units of local government may subgrant rapid re-housing funding to housing authorities. See Notice CPD-17-10 Sub-awarding Emergency Solutions Grants Program Funds to Public Housing Agencies and Local Redevelopment Authorities.

Each subrecipient must adhere to the following requirements including:

- Full participation in coordinated/centralized assessment system
- 100 percent of project participants assessed with community-based common assessment tool
- Coordination with other homeless services and homeless prevention providers
- Use of HMIS that meets HUD HMIS data standards (domestic violence programs may use another data system, but must meet all HUD HMIS data standards and reporting requirements)
- Timely referral of eligible households for homeless prevention assistance through coordinated assessment/entry
- Timely referral of eligible households for rapid re-housing through coordinated assessment/entry or coordination with providers
- Documentation of project participant homeless status and services received
- Completion of a housing barrier assessment and subsequent individualized housing plan that includes how permanent housing will be maintained when assistance is terminated

- Adherence to a primary focus on quick placement into permanent housing
- Adherence to a secondary focus on housing stability

Crisis Response System

A **crisis response system** is critical to preventing and ending homelessness, when effective, through aligning the community, available programs, and services. Core elements of an effective crisis response system including identification of households experiencing homelessness, quick connections to permanent housing solutions, and provision of services as needed. These goals can be achieved through:

Outreach: Outreach workers connect unsheltered households experiencing homelessness to coordinated entry, emergency services, and shelter while working with other programs within the system to connect households to permanent housing.

Coordinated entry: Coordinated entry (or access) is a process designed to provide access, assessment, prioritization, and referrals for households at-risk for or experiencing homelessness.

Housing problem-solving: Housing problem-solving is a person-centered, housing-focused approach to explore creative, safe, and cost-effective solutions to quickly resolve a housing crisis and supports the effective implementation of homelessness prevention, diversion, and rapid exit strategies.

Targeted Homelessness Prevention: Targeted homelessness prevention directs limited rental assistance and supportive service resources specifically towards households most likely to enter the homeless system *but for* these efforts, whereas eviction prevention casts a wide net to ensure that households generally do not lose their current housing.

Emergency shelters: Emergency shelters are a last resort option for households experiencing a housing crisis or fleeing an unsafe living situation who need a safe place to stay and would otherwise have to stay in a place not meant for human habitation. Emergency shelters should be low-barrier and focused on permanent housing solutions.

Permanent housing: A crisis response system must have the capacity to connect people experiencing homelessness with permanent housing programs, such as rapid re-housing and permanent supportive housing, and other stable housing options.

Role of the CoC

A Continuum of Care (CoC) is a core network of interconnected programs and services designed to assist people who are homeless or at-risk of becoming homeless. The CoC is an important part of the larger crisis response system. The role of the Atlanta CoC is to:

- Promote community-wide planning and implementation to prevent and end homelessness
- Provide funding for efforts to rehouse persons experiencing homelessness
- Support access to mainstream benefits and resources
- Optimize housing stabilization

The CoC provides a foundation for a broader community partnership working toward the shared goals of preventing homelessness before it occurs and quickly returning homeless individuals and families to stable housing. The City of Atlanta's partnership with CoC is crucial in reaching the most vulnerable populations of Metropolitan Atlanta.

Responsibilities

The responsibilities of the CoC include governance and structure, system coordination and planning, designating and operating the HMIS, and designing a coordinated entry system.

Governance and Structure

The Atlanta CoC is governed by the Governing Council, a voluntary policymaking body chartered by the City of Atlanta and approved by the Atlanta CoC membership. Membership includes at least one homeless or formerly homeless person. The governance and structure of the Governing Council and Atlanta CoC are outlined in the Governance Charter.

System Coordination and Planning

The system should include coordinated outreach and engagement, entry and assessment, emergency shelter, permanent housing, supportive services, and homelessness prevention strategies. The Atlanta CoC Written Standards have been established to guide the implementation of all homeless assistance services.

Planning efforts must ensure a coordinated system by conducting a point-in-time count, housing inventory county, annual gaps analysis, participation in consolidated plan development and consultation with ESG subrecipients. In addition, the Atlanta CoC monitors performance measures and acts against poor performers.

Designating and Operating HMIS

The Atlanta CoC has a designated to lead training to carry out the day-to-day operations of its Homeless Management Information System (HMIS). HMIS is used to record client information that is shared among homeless service providers who serve. Atlanta CoC partners with eight other CoCs in Georgia to use one HMIS application – ClientTrack. This partnership allows the CoCs to share information about the people we serve in the community and coordinate client-centered support. The Atlanta CoC partners with its arm, Partners For Home that provides on-going training of Atlanta HMIS Coordinated Entry for Providers, Atlanta HMIS Coordinated Entry for Assessors and Atlanta HMIS 101: ClientTrack. Each training ensures that the providers can keep the data required for ESG funding and connect information on client served.

Coordinated Entry

The Atlanta CoC operates a coordinated entry system that provides an initial, comprehensive assessment of households who are homeless to best connect them to the housing and services needed to return to permanent housing stability. More information can be found in the Atlanta CoC Policies and Procedures Manual for Coordinated Entry.

ESG Requirements

Match Requirement

ESG-CV funds are not subject to match requirements the otherwise apply to the ESG Program. ESG funds made available annually through non-CARES Act appropriations are subject to a 100% match requirement, meaning that every dollar received through the ESG Program must be matched with another dollar from an allowable match source. All match funds must be spent on ESG-eligible activities within the period of the Grant Agreement. The following are eligible types of match contributions:

1. Cash
2. In-Kind (Non-Cash) Contributions, defined as:
 - a. The value of any real property, equipment, goods, or services contributed to the subrecipient's ESG program, provided that if the recipient or subrecipient had to pay for them with grant funds, the costs would have been allowable. May also include the purchase value of any donated building.
 - b. Costs paid by program income shall count toward meeting the recipient's matching requirements, provided the costs are eligible ESG costs that supplement the recipient's ESG program.

Matching contributions may be obtained from any source, including any Federal source other than the ESG program, as well as state, local, and private sources. Unless the laws governing the use of other Federal funds prohibits the use of those funds as a matching source. Additional matching requirements may be found at 576.201 of the ESG Program interim rule.

Eligible Service Areas

The City of Atlanta is in support of leveraging funds to bring significant resources to address some of the most challenging issues surrounding homelessness and prevention to the Atlanta Metropolitan area. The funds that are used by the City of Atlanta varies from project to project.

Environmental Reviews

Environmental reviews (ER) are required for rapid re-housing when rental assistance is provided. The environmental review is based on the building and surrounding geography, not the specific unit. If a unit is located within a building or a complex, the ER need only be conducted on the building or complex and not each unit. Environmental reviews are valid for five years, so if a unit building or complex has had a review within the last five years, an additional ER is not necessary. Organizations may not commit or expend ESG funds until an environmental review that meets the standards outlined in 24 CFR Part 58 has been approved.

Lower-Level Reviews

Most ESG activities, including ESG **tenant based rental assistance (TBRA)**, require only a lower level of environmental review because they fall under the Categorical exclusion not subject to §58.5 (CENST) level of review (see 24 CFR Part 58.35(b) (1)). Environmental reviews for most ESG activities need only demonstrate compliance with the environmental laws and authorities listed in 24 CFR 58.6 (Airport and Runway Clear Zones, Coastal Barrier Resources, and Flood Insurance).

For the ESG program, a separate environmental review is not required for each unit or each building in which TBRA is being provided; recipients need to complete only one Environmental Review Record (ERR) per project (see Exempt/CENST form). This means that recipients are encouraged to conduct a single environmental review that considers all tenant-based rental assistance throughout its jurisdiction, completing one ERR for each tenant-based rental assistance project (RRH and/or HP) for its ESG grant. All TBRA activities or units would be aggregated and included in that one environmental review. ***The project location would be considered the address of the agency or organization that is administering the TBRA program.***

Higher-Level Reviews

In general, the only ESG-eligible activities that require a higher level of environmental review are **project-based rental assistance (PBRA)**, renovation, and leasing (i.e., leasing an emergency shelter or office space). That higher level of review is Categorically Excluded Subject To the individual compliance requirements of the Federal laws and authorities cited in 24 CFR Part 58.5 (CEST).

If an ESG Program recipient is completing an environmental review for project-based units under Part 58, consult with your Field Environmental Officer for information on how to conduct a limited scope review. Additionally, any project participants moving into a Coastal Barrier Resource System county (*Chatham, Bryan, Liberty, McIntosh, Glynn, and Camden*), a new Environmental Review must be completed per location and grant funds may not be committed to any activity until the Environmental Review is approved.

The environmental review form, Environmental Review for Activity/Project that is Exempt or Categorically Excluded Not Subject to Section 58.5 (Pursuant to 24 CFR 58.34(a) and 58.35(b)), must be completed for each unit or complex that falls within a flood plain or coastal barrier where rental assistance is provided.

ESG Project Components and Eligible Activities

There are six project components under which costs can be incurred and activities provided through the ESG Program:

- Street Outreach
- Homelessness Prevention
- Emergency Shelter Operations
- Rapid Re-housing
- HMIS
- Administrative Costs

ESG activities and related costs are designed to support the crisis response system. ESG assistance is designed prevent homelessness where possible, provide emergency shelter as a last resort option, quickly resolve homelessness through permanent housing, and support housing stability. Assistance should be focused on housing stabilization, linkages to mainstream benefits, community resources, and natural supports. Specific eligible costs for the ESG Program are provided at 24 CFR 576.101 – 108 and for the ESG-CV Program as provided at HUD Notice CPD-20-08.

Housing First

Housing First is a programmatic and systems approach centered on quickly providing persons or families experiencing homelessness with housing and then providing services, as needed, using a low barrier approach with an emphasis on stable tenancy, community integration, recovery, and individual choice. Housing First approaches do not impose preconditions to make referrals to permanent housing, shelter, or other temporary housing, such as sobriety, minimum income requirements, absence of a criminal record, completion of treatment, participation in services, or other unnecessary conditions. Additional resources on Housing First are available through the United States Interagency Council on Homelessness (USICH).

All programs must use a housing first approach that focuses on moving project participants into permanent housing as quickly as possible.

Coordination with Mainstream Benefits and Resources

Subrecipients must assist all program participants, as needed, in obtaining mainstream benefits, long-term housing subsidies, medical health treatment, behavioral health treatment, peer support, and other services or resources that will support housing stabilization from programs including, but not limited to:

- Housing Choice Voucher (HCV)
- Veterans Affairs Supportive Housing (VASH)
- Medicaid
- Supplemental Nutrition Assistance Program (SNAP)
- Women, Infants and Children (WIC)
- Federal-State Unemployment Insurance
- Social Security Disability Insurance (SSDI)
- Supplemental Security Income (SSI)
- Other mainstream resources such as housing, health, social services, employment, education services and youth programs that an individual or family may be eligible to receive

Proof of Housing Problem Solving

All providers must engage households seeking homeless assistance in a problem-solving conversation to address the household's current housing crisis and document these efforts in case notes. This should include a discussion of alternative resources available to the household, linkages to mainstream benefits and natural supports, and light-touch assistance. Housing problem solving can help relieve coordinated entry and housing resources by reducing inflow and pressure on scarce resources, allowing coordinated entry to focus effort on those who do not have alternatives.

Performance Measures

Subrecipients will be evaluated and monitored on how well they achieve key performance metrics and are required to report on the following outputs:

- Demographics
- Permanent housing placements
- Length of time receiving financial assistance (Prevention and RRH)
- Length of time receiving case management
- Capacity and utilization (Emergency Shelter Operations)
- Disparities by race and ethnicity

The CoC will be required to report on outputs and HUD's System Performance Measures to include:

Outputs:

- Number of households avoiding homelessness
- Number of households placed in permanent housing
- Number of persons homeless on the night of the point-in-time count

System Performance Measures

- Length of time persons remain homeless
- Returns to homelessness (recidivism)

- Number of persons homeless for the first time
- Employment and income growth
- Retention of permanent housing

Evaluation of the CoC will occur annually for improvements in system performance measures. Additionally, during subrecipient and system monitoring, evaluations of the following processes will occur:

- Ensuring that all households at coordinated entry access points are assessed with a standardized assessment tool
- Entry points are low-barrier and easily accessible
- Appropriate written policies and procedures are implemented
- Individualized housing-focused case management

Participant Initial Screening for Eligibility

Any household seeking homeless assistance must be initially screened through coordinated entry. Such screening must be completed in a manner that allows for the identification of household for homelessness prevention services and immediate referral to the appropriate provider.

ESG Participant Eligibility

Project Participant Initial Eligibility by Activity Type	
<i>Eligible Activity</i>	<i>Project Participant Eligibility</i>
Homelessness Prevention	<ul style="list-style-type: none"> • At imminent risk of homelessness, AND • Housing income below 30 percent AMI, AND • No other resources
Emergency Shelter	<ul style="list-style-type: none"> • Literally homeless • At imminent risk of homelessness and diversion has been attempted • Individuals exiting institution (where they resided temporarily) with no resources or anywhere to go • Individuals fleeing domestic violence
Rapid Re-housing	<ul style="list-style-type: none"> • Literally homeless (shelter residents, living in other situations not meant for human habitation); or • Individuals who were literally homeless prior to entering an institution (where they resided temporarily – 90 days or less) and are exiting the institution with no resources or anywhere to go; AND • No other resources

Street Outreach

Street Outreach is designed to ensure safety for unsheltered homeless households and quickly connect them to temporary and permanent housing opportunities. Street outreach services are provided to unsheltered households and are not used to support individuals and families living in emergency shelter or other housing opportunities. Street outreach does not require individuals to enter emergency shelter or transitional housing as an “interim step” or prerequisite to accessing stable housing. However, street out-

reach does make immediate connections to emergency shelter or temporary housing to provide safe options while individuals and families are on a pathway toward stability. To the extent possible, street outreach will use Housing First approaches that do not impose preconditions to make referrals to permanent housing, shelter, or other temporary housing, such as sobriety, minimum income requirements, absence of justice involvement, completion of treatment, participation in services, or other unnecessary conditions.

Project Participant Eligibility

Unsheltered homelessness includes individuals or families who lack a fixed, regular, and adequate nighttime residence. Examples include an individual or family with a primary nighttime residence that is a public or private place not meant for human habitation including but not limited to a car, park, abandoned building, bus or train station, airport, or encampment.

Requirements

Street Outreach must connect with the City of Atlanta coordinated entry system.

Required Documentation:

- Homeless Verification Form
- Strengths-based housing barrier assessment and housing plan
- Evidence of connection with the City of Atlanta coordinated entry system
- Coordination with mainstream resources (as appropriate)

Eligible Expenses

Essential Services are an eligible activity under the Street Outreach component when provided to unsheltered individuals and families. Services are provided on the street, or in parks, abandoned buildings, bus stations, campgrounds, and other unsheltered settings.

Eligible Street Outreach activities include:

- Engagement and housing-focused case management
- Emergency health services
- Emergency mental health services
- Transportation
- Service location costs

Engagement and Housing-Focused Case Management

Engagement and housing-focused case management includes the costs of activities to locate, identify, and build relationships with unsheltered households experiencing homelessness and the cost of assessing housing and service needs, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the project participant.

Emergency Health Services

Outpatient treatment of urgent medical conditions by licensed medical professionals in community-based settings (e.g., streets, parks, and campgrounds). These services are eligible only to the extent that other appropriate health services are inaccessible or unavailable within the area.

Emergency Mental Health Services

Outpatient treatment of urgent mental health conditions by licensed professionals in community-based settings (e.g., streets, parks, and campgrounds). These services are eligible only to the extent that other appropriate mental health services are inaccessible or unavailable within the area.

Transportation

Travel by outreach workers, social workers, medical professionals, or other service providers during the provision of eligible street outreach services. Also includes the costs of transporting unsheltered people to emergency shelters or other service facilities.

Service Location Costs

Service location costs funds may be used for service location costs, such as rent for office space, printer/copier costs, and utilities for an office.

Homelessness Prevention (or Targeted Prevention)

Homelessness Prevention assistance consists of financial assistance and supportive services to assist households in maintaining stable housing and avoid becoming homeless. Homelessness Prevention may assist a household to recover from a temporary financial setback that caused late or overdue payments for rent or utilities and may provide short-term stability while the household recovers. Homelessness prevention is not intended to operate as an eviction prevention program and non-financial prevention assistance should be leveraged where possible to divert households from homelessness. Financial assistance must be targeted to households most likely to enter shelter but for the financial assistance.

Project Participant Eligibility

Homelessness Prevention assistance is limited to those households who will imminently lose their primary nighttime residence within 14 days and meet all other requirements. The household income must be below 30 percent AMI with no more than in assets (including all checking, savings, retirement accounts, stocks, bonds, mutual funds, and real estate). The asset limit is assessed after monthly expenses have been paid and does not include primary, appropriate, and reasonable transportation or pension/retirement funds that cannot be accessed.

Financial assistance beyond three months requires recertification of eligibility. This recertification must then be completed every three months based on the household's project entry date for the duration of the financial assistance. Recertification requires documentation of the following:

- Project participant household income below 30 percent AMI
- The household lacks the financial resources and support networks needed to remain in existing housing without prevention assistance
- Housing stabilization services are being appropriately implemented
- The household does not exceed the asset limit

Recertification Requirement	
Any Financial Assistance	Every three months
Services/Case Management Only	Every twelve months

Requirements

Prevention providers must coordinate with other service providers to ensure project participants receive services in a timely manner.

Provision of any financial assistance should be “needs-based,” meaning that subrecipients should determine the amount of assistance based on the minimum amount needed to maintain housing stability in the near term. This will allow communities to use program resources efficiently to serve as many households as possible.

When households are moved into a new unit or stabilized into an existing unit, the rent must meet two standards:

- Rent Reasonableness – rent is equal to or less than other like units in the area
- Fair Market Rent (FMR) – rent (including utilities) is at or below the HUD established FMR for the unit size in the unit location

Rent reasonableness means that the total rent charged for a unit must be reasonable in relation to the rents being charged during the same time period for comparable units in the private unassisted market and must not be in excess of rents being charged by the owner during the same time period for comparable non-luxury unassisted units. To make this determination, the subrecipient should consider (a) the location, quality, size, type, and age of the unit; and (b) any amenities, housing services, maintenance and utilities to be provided by the owner.

FMR limits include the cost of utilities. Providers will need to utilize an established utility allowance in order to assess FMR limits for rents on units not including all utilities. The actual rent charged for a unit plus the allowance for any utilities that the project participant must pay themselves must not exceed the FMR for the area.

If the gross rent for the unit exceeds either the rent reasonableness standard or the FMR, subrecipients are prohibited from using ESG funds for any portion of the rent, even if the household is willing and/or able to pay the difference.

Payments must not be made directly to project participants, but only to landlords or property management companies. In addition, an assisted property may not be owned by the subrecipient or their parent, subsidiary, or affiliated organization (see Conflicts of Interest).

Monthly housing-focused case management is required but participation in all program services must be voluntary. The appropriate level of case management must be provided in order to ensure housing stability.

Required Documentation:

- All project participants must receive an initial screening
- Certification form signed by the project participant stating that the project participant has received a copy of the subrecipient’s grievance policy
- All households must have strength-based housing barrier assessments and housing plans
- Subrecipients must use HUD Published Income Limits for determining income limits and AMI

- A copy of the HUD rent reasonableness worksheet and Fair Market Rents (FMR) for the area must be completed and included in the project participant file
- Prevention financial assistance requires that the project participant head of household have a valid lease with a landlord that follows tenant/landlord laws in their name with a copy of the lease in the participant file
- Monthly housing-focused case management (e.g., updates on housing plan, noted progress toward housing stability, etc.)

Eligible Expenses

The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain housing stability in their current permanent housing or move into other permanent housing and achieve stability in that housing.

Eligible homelessness prevention activities include:

- Housing stabilization case management
- Housing stabilization financial assistance
- Housing stabilization services
- Rental assistance and rent arrears
- Service location costs

Housing Stabilization Case Management

Funds may be used for housing stabilization case management. This includes the costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for project participants residing in permanent housing or to assist a project participant in overcoming immediate barriers to obtaining housing. Project participants must receive housing focused case management at least once a month.

This assistance cannot exceed 24 months during the period the project participant is living in permanent housing.

These costs include:

- Conducting initial assessments
- Counseling
- Facilitating access to mainstream services
- Monitoring and evaluating project participant progress
- Coordination with and referrals to other providers
- Developing individualized housing and service plans
- Fees for use of auxiliary aids and language services

Prevention funds can be used for housing focused case management alone. That is, although rental assistance cannot be provided independent of case management services, case management can be provided independent of rental assistance. For example, case management could be provided after the term of a project participant's rental assistance expires, if the 24-month cap for each type of assistance is not exceeded. Recertification for case management is required at 12 months.

“Stand alone” case management or other services can also be provided to support project participants who receive rental assistance through non-ESG funds, if the individual or family is eligible for assistance at the time of the intake.

Housing Stabilization Financial Assistance

Funds may be used to provide financial assistance to help project participants quickly access housing. The housing relocation and stabilization services financial assistance includes:

- Security and utility deposits
- Last month’s rent
- Utility payments
- Utility arrears
- Moving costs
- Application fees
- Project participant travel costs Funds may be used to pay for security deposits, including utility deposits, for project participants.

This is eligible in the case where the project participant is otherwise eligible, and they are not receiving security or utility deposit assistance from another source. Security deposits must be paid directly to landlords or property managers.

Subrecipients must not take measures to recapture any deposit assistance provided to project participants. In the cases where the return of a deposit to the subrecipient is unavoidable, all returned deposits must be tracked as program income. Any resulting program income must be used for eligible activities.

Funds may be used for up to 24 months of utility payments for each project participant in any three-year period, provided that the project participant or a member of his/her household has an account in his/her name with a utility company and is not receiving assistance for the same period of time for the utilities.

Utility assistance may include up to six months of utility payments in arrears per service. Payments of arrears must be counted toward the 24-month limit. The subrecipient must use Atlanta Housing’s utility allowance guideline to set reasonable limits for utility payments. Assistance with utilities may be structured where the project participant pays a portion of the utilities. Partial assistance payment for any month of utilities counts as a month of assistance.

Utilities are limited to water/sewer, heating oil, gas, and electricity. Twenty-four-month limits are based on assistance with one or more of the basic utilities per month. Since the actual number of months may be difficult to determine, subrecipients may estimate the total number of months covered. In these cases, the subrecipient must document the basis for the estimation.

Funds may be used for reasonable moving costs, such as truck rental or hiring a moving company, to assist an eligible household with housing stability.

Funds may be used for lease or apartment application fees where necessary, and no other source has been identified to assist an eligible household with housing stability.

Funds may be used for reasonable project participant costs directly related to housing stabilization efforts.

Project participant travel costs may include the cost for bus, taxi, or ride share services for the project participant during the housing search or unit leasing process. All project participant travel costs must be pre-approved by the DGCD program administrator.

Housing Stabilization Services

Funds may be used for services that are targeted to assist project participants to maintain housing. These may include critical skills related to household budgeting, money management, accessing a personal credit report, and resolving personal credit issues. If subrecipients elect to conduct credit checks on project participants, they must do so for all project participants so as not to violate Fair Housing Law or otherwise discriminate among project participants. Subrecipients may not use these funds to reimburse landlords for their costs associated with conducting credit and/or background checks. Credit may not be used to determine program eligibility. Payment of debt is an ineligible expense.

Rent Assistance and Rent Arrears

Rental assistance is tenant-based rental assistance that can be used to allow individuals and families to obtain and remain in rental units.

Providers must determine the amount of rental assistance provided, such as “shallow subsidies” (payment of a portion of the rent), payment of 100 percent of the rent, or graduated/declining subsidies. Providers may require a project participant to share in the costs of rent. These funds cannot be used for mortgage assistance.

No project participant may receive more than 24 months of assistance during any three-year period. Assistance with any portion of rent during a month counts as a month toward the 24-month limit.

Payment of rent arrears consists of a one-time payment for up to six months in arrears, including any late fees on those arrears. Rental arrears may be paid if the payment enables the project participant to obtain or retain a housing unit. Rental arrearage assistance should only be used to prevent homelessness.

If funds are used to pay rental arrears, arrears must be included in determining the total period of the project participant’s rental assistance, which may not exceed 24 months. While the payment of rent arrears is a lump sum and recorded as such in HMIS, each month and the number of months must be noted in HMIS and counted toward the total rent assistance limit of 24 months.

Any individual or family receiving assistance beyond any arrears and two current months of rent and financial assistance must be evaluated and recertified as eligible every three months. Funds may not be used to pay damage costs incurred by the tenant.

The rental assistance to move into a unit or to stabilize into an existing unit cannot exceed the actual rental cost, which must follow HUD’s standard of rent reasonableness and at or below Fair Market Rents (FMR) for the area.

Rental assistance or arrears to pay for a lot on which a manufactured or mobile home is located is an eligible expense if the household is otherwise eligible. Rental assistance provided toward rent for a housing unit owned by a subrecipient, related entity, or partner is prohibited.

Service Location Costs

Funds may be used for service location costs, such as rent for office space, printer/copier costs, and utilities for an office.

Emergency Shelter Operations

The role of emergency shelter is to provide a safe place for persons who have been unable to resolve a housing crisis and have no alternatives for temporary housing. The goal of the ESG-funded emergency shelter operations is to assist residents in moving from shelter into stable housing as quickly as possible. Housing planning should begin immediately upon entry to shelter, or prior to shelter entry should the household be engaged in outreach services.

Project Participant Eligibility

Emergency shelter participant eligibility includes the following three categories:

1. Literally homeless: individuals or families who lack a fixed, regular, and adequate nighttime residence, such as an individual or family with a primary nighttime residence that is a public or private place not meant for human habitation and those existing in an institution where they resided temporarily
2. At imminent risk of homelessness: individuals or families who will imminently lose their primary nighttime residence within 14 days and housing problem solving/diversion has been attempted
3. Households fleeing or attempting to flee domestic violence who are either literally homeless or at imminent risk of homelessness

Requirements

Emergency Shelter must connect with the City of Atlanta coordinated entry system. Shelter providers must engage in and document housing problem solving conversations to address the immediate housing crisis.

Coordination with prevention resources must be established and maintained to ensure timely referrals where appropriate. Subrecipients must work with local prevention providers to help identify and refer all households seeking shelter where prevention of homelessness would be a viable alternative.

Required Documentation:

- Homeless Verification Form
- Certification form signed by the project participant stating that the project participant has received a copy of the provider's grievance policy
- Strengths-based housing barrier assessment and housing plan
- Coordination with mainstream resources

Eligible Expenses

Shelter expenses must be for actual leasing costs accrued by the subrecipient for the housing unit(s), hotel/motel vouchers, or building(s) where temporary shelter and essential services are provided. These funds may not be used to reimburse the subrecipient for costs associated with a mortgage or loan on the property. Funds may be used for service location costs, such as rent for office space, printer/copier costs, and utilities for an office.

Eligible Emergency Shelter Operations activities include:

- Housing-focused case management
- Security
- Maintenance
- Supplies
- Shelter and service location costs

Housing-focused Case Management

Case management must be housing focused. Costs include:

- Conducting initial assessments
- Completing a strength-based housing barriers assessment and corresponding individualized housing and service plans
- Assisting a project participant in overcoming immediate barriers to obtaining housing
- Facilitating access to mainstream services
- Monitoring and evaluating project participant progress
- Coordination with and referrals to other providers
- Fees for use of auxiliary aids and language services

Security

Both security and maintenance costs may include staff costs accrued by the subrecipient in the performance of security and/or maintenance. Any security, maintenance, or any other contract for services must adhere to subrecipient procurement policies.

Maintenance

As condominium fees cover maintenance and sometimes utilities associated with a unit, these are allowable for subrecipient-owned properties utilized for programs funded through this program.

Supplies

Supplies are limited to those directly related to meeting basic health and safety needs of project participants during the shelter stay. These include but are not limited to office supplies, cleaning supplies, food costs for meals provided, and bathroom supplies. Supplies do not include luxury items or items that go beyond meeting basic health and safety needs of project participants.

The subrecipient should contact their program administrator for further guidance.

Shelter and Service Location Costs

Funds may be used for service location costs, such as rent for office space, printer/copier costs, and utilities for an office.

Rapid Re-Housing

Rapid Re-Housing is an intervention designed to help individuals and families quickly exit homelessness and return to permanent housing. Rapid Re-Housing uses a Housing First approach and is offered without preconditions, such as sobriety, minimum income requirements, absence of justice involvement, completion of treatment, participation in services, or other unnecessary conditions. All services are tailored to the unique needs of each housing.

Core components of Rapid Re-Housing include:

1. Housing identification
2. Rent and move-in assistance
3. Case management

Project Participant Eligibility

Rapid Re-Housing assistance is limited to literally homeless households who lack a fixed, regular, and adequate nighttime residence. This includes individuals or families who are unsheltered or in a place not meant for human habitation, currently residing in an emergency shelter, and those exiting an institution (where they resided temporarily for 90 days or fewer) with no housing resources.

The household’s annual income annually for Rapid Re-Housing - the participant’s household must have an annual income that does not exceed 30% of AMI with assets (including all checking, savings, retirement accounts, stocks, bonds, mutual funds, and real estate). The asset limit is assessed after monthly expenses have been paid and does not include primary, appropriate, and reasonable transportation or pension/retirement funds that cannot be accessed.

Financial assistance beyond three months requires recertification of eligibility. This recertification must then be completed every three months based on the household’s project entry date for the duration of the financial assistance. Recertification requires documentation of the following:

- Project participant household income below 30 percent AMI
- The household lacks the financial resources and support networks needed to remain in existing housing without prevention assistance
- Housing stabilization services are being appropriately implemented
- The household does not exceed the asset limit

Recertification Requirement	
Any Financial Assistance	Every three months
Services/Case Management Only	Every twelve months

Requirements

Provision of any financial assistance should be “needs-based,” meaning that subrecipients should determine the amount of assistance based on the minimum amount needed to maintain housing stability in the near term. This will allow communities to use program resources efficiently to serve as many households as possible.

Rapid Re-Housing assistance usually begins prior to the project participant entering housing. For ESG Rapid Re-Housing projects in HMIS should be set up as follows:

1. The project entry date is the date the person eligible for ESG rapid re-housing assistance is admitted to the project, even if only in initial stage of engagement.
2. At project entry, record the Universal Data Elements and any other information required at project entry.
3. When the project participant moves into permanent housing, enter the date the household physically moves into housing in the move-in date field.

When households are moved into a new unit or stabilized into an existing unit, the rent must meet two standards:

- Rent Reasonableness – rent is equal to or less than other like units in the area
- Fair Market Rent (FMR) – rent (including utilities) is at or below the HUD established FMR for the unit size in the unit location

Rent reasonableness means that the total rent charged for a unit must be reasonable in relation to the rents being charged during the same time period for comparable units in the private unassisted market and must not be in excess of rents being charged by the owner during the same time period for comparable non-luxury unassisted units. To make this determination, the subrecipient should consider (a) the location, quality, size, type, and age of the unit; and (b) any amenities, housing services, maintenance and utilities to be provided by the owner.

FMR limits include the cost of utilities. Providers will need to utilize an established utility allowance in order to assess FMR limits for rents on units not including all utilities. The actual rent charged for a unit plus the allowance for any utilities that the project participant must pay themselves must not exceed the FMR for the area.

If the gross rent for the unit exceeds either the rent reasonableness standard or the FMR, subrecipients are prohibited from using ESG funds for any portion of the rent, even if the household is willing and/or able to pay the difference.

Payments must not be made directly to project participants, but only to landlords or property management companies. In addition, an assisted property may not be owned by the subrecipient or their parent, subsidiary, or affiliated organization (see Conflicts of Interest).

Monthly housing-focused case management is required but participation in all program services must be voluntary. The appropriate level of case management must be provided in order to ensure housing stability.

Required Documentation:

- All project participants must receive an initial screening
- Proof of housing problem solving/diversion
- Homeless Verification Form
- Certification form signed by the project participant stating that the project participant has received a copy of the subrecipient's grievance policy
- All project participants must receive initial eligibility certification using documentation required by HUD homeless varication.
- All households must have strength-based housing barrier assessments and housing plans
- Subrecipients must use HUD Published Income Limits for determining income limits and AMI
- A copy of the HUD rent reasonableness worksheet and Fair Market Rents (FMR) for the area must be completed and included in the project participant file
- A copy of the completed utility allowance worksheet must be included in the project participant file

- Prevention financial assistance requires that the project participant head of household have a valid lease with a landlord that follows tenant/landlord laws in their name with a copy of the lease in the participant file
- Monthly housing-focused case management (e.g., updates on housing plan, noted progress toward housing stability, etc.)
- Subrecipients must have written agreements with both the project participant and the landlord that identify the terms of the rapid re-housing assistance. This should specifically provide the landlord with guidance for addressing issues which could impact housing stability and must include:
 - A provision requiring the owner to give the subrecipient a copy of any notice to the project participant to vacate the housing unit, or any complaint used under state/local law to commence eviction proceedings against the project participant
 - The same payment due date, grace period and late payment penalty requirements as the project participant's lease
 - The term of the rental assistance agreement for the period they anticipate providing financial assistance

Eligible Expenses

The costs of rapid re-housing are only eligible to the extent that the assistance is necessary to help the program participant regain housing stability in their current permanent housing or move into other permanent housing and achieve stability in that housing.

Eligible rapid re-housing activities include:

- Housing stabilization case management
- Housing stabilization financial assistance
- Housing stabilization services
- Rental assistance and rent arrears
- Housing search and placement
- Service Location Costs

Housing Stabilization Case Management

Funds may be used for housing stabilization case management. This includes the costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for project participants residing in permanent housing or to assist a project participant in overcoming immediate barriers to obtaining housing. Project participants must receive housing focused case management at least once a month.

This assistance cannot exceed 30 days during the period the project participant is seeking permanent housing and cannot exceed 24 months during the period the project participant is living in permanent housing.

These costs include:

- Conducting initial assessments
- Counseling
- Facilitating access to mainstream services

- Monitoring and evaluating project participant progress
- Coordination with and referrals to other providers
- Developing individualized housing and service plans
- Fees for use of auxiliary aids and language services

Rapid re-housing funds can be used for housing focused case management alone. That is, although rental assistance cannot be provided independent of case management services, case management can be provided independent of rental assistance. For example, case management could be provided after the term of a project participant’s rental assistance expires, if the 24-month cap for each type of assistance is not exceeded. Recertification for case management is required at 12 months.

“Stand alone” case management or other services can also be provided to support project participants who receive rental assistance through non-ESG funds, if the individual or family is eligible for assistance at the time of the intake.

Housing Stabilization Financial Assistance

Funds may be used to provide financial assistance to help project participants quickly access housing. The housing relocation and stabilization services financial assistance includes:

- Security and utility deposits
- Last month’s rent
- Utility payments
- Utility arrears
- Moving costs
- Application fees
- Project participant travel costs Funds may be used to pay for security deposits, including utility deposits, for project participants.

This is eligible in the case where the project participant is otherwise eligible, and they are not receiving security or utility deposit assistance from another source. Security deposits must be paid directly to landlords or property managers.

Subrecipients must not take measures to recapture any deposit assistance provided to project participants. In the cases where the return of a deposit to the subrecipient is unavoidable, all returned deposits must be tracked as program income. Any resulting program income must be used for eligible activities.

Funds may be used for up to 24 months of utility payments for each project participant in any three-year period, provided that the project participant or a member of his/her household has an account in his/her name with a utility company and is not receiving assistance for the same period of time for the utilities.

Utility assistance may include up to six months of utility payments in arrears per service. Payments of arrears must be counted toward the 24-month limit. The subrecipient must use Atlanta Housing’s utility allowance guideline to set reasonable limits for utility payments. Assistance with utilities may be structured where the project participant pays a portion of the utilities. Partial assistance payment for any month of utilities counts as a month of assistance.

Utilities are limited to water/sewer, heating oil, gas, and electricity. Twenty-four-month limits are based on assistance with one or more of the basic utilities per month. Since the actual number of months may

be difficult to determine, subrecipients may estimate the total number of months covered. In these cases, the subrecipient must document the basis for the estimation.

Funds may be used for reasonable moving costs, such as truck rental or hiring a moving company, to assist an eligible household with housing stability.

Funds may be used for lease or apartment application fees where necessary, and no other source has been identified to assist an eligible household with housing stability.

Funds may be used for reasonable project participant costs directly related to housing stabilization efforts.

Project participant travel costs may include the cost for bus, taxi, or ride share services for the project participant during the housing search or unit leasing process. All project participant travel costs must be pre-approved by the DGCD program administrator.

Housing Stabilization Services

Funds may be used for services that are targeted to assist project participants to maintain housing. These may include critical skills related to household budgeting, money management, accessing a personal credit report, and resolving personal credit issues. If subrecipients elect to conduct credit checks on project participants, they must do so for all project participants so as not to violate Fair Housing Law or otherwise discriminate among project participants. Subrecipients may not use these funds to reimburse landlords for their costs associated with conducting credit and/or background checks. Credit may not be used to determine program eligibility. Payment of debt is an ineligible expense.

Rent Assistance and Rent Arrears

Rental assistance is tenant-based rental assistance that can be used to allow individuals and families to obtain and remain in rental units.

Providers must determine the amount of rental assistance provided, such as “shallow subsidies” (payment of a portion of the rent), payment of 100 percent of the rent, or graduated/declining subsidies. Providers may require a project participant to share in the costs of rent. These funds cannot be used for mortgage assistance.

No project participant may receive more than 24 months of assistance during any three-year period. Assistance with any portion of rent during a month counts as a month toward the 24-month limit.

Payment of rent arrears consists of a one-time payment for up to six months in arrears, including any late fees on those arrears. Rental arrears may be paid if the payment enables the project participant to obtain or retain a housing unit. Rental arrearage assistance should only be used to prevent homelessness.

If funds are used to pay rental arrears, arrears must be included in determining the total period of the project participant’s rental assistance, which may not exceed 24 months. While the payment of rent arrears is a lump sum and recorded as such in HMIS, each month and the number of months must be noted in HMIS and counted toward the total rent assistance limit of 24 months.

Any individual or family receiving assistance beyond any arrears and two current months of rent and financial assistance must be evaluated and recertified as eligible every three months. Funds may not be used to pay damage costs incurred by the tenant.

The rental assistance to move into a unit or to stabilize into an existing unit cannot exceed the actual rental cost, which must follow HUD's standard of rent reasonableness and at or below Fair Market Rents (FMR) for the area.

Rental assistance or arrears to pay for a lot on which a manufactured or mobile home is located is an eligible expense if the household is otherwise eligible. Rental assistance provided toward rent for a housing unit owned by a subrecipient, related entity, or partner is prohibited.

Housing Search and Placement

Housing search and placement funds may be used for services or activities designed to assist individuals or families in locating, obtaining, and retaining suitable housing. Component services or activities may include staff costs related to tenant counseling, assisting individuals and families to understand leases, securing utilities, making moving arrangements, representative payee services concerning rent and utilities, and outreach and negotiation with property owners related to locating or retaining housing. Costs also include expenditures associated with assessing housing unit compliance with property standards, lead requirements, and rent reasonableness. Costs associated with staff in the role of housing locator would be eligible housing search, and placement costs.

Service Location Costs

Funds may be used for service location costs, such as rent for office space, printer/copier costs, and utilities for an office.

Homeless Management Information System (HMIS)

HMIS is a local information technology system used to collect project participant-level data and data on the provision of housing and services to individuals and families experiencing homelessness, as well as those at-risk for homelessness. The Atlanta CoC is responsible for maintaining compliance with HUD's data collection, management, and reporting standards.

Requirements

Subrecipients are required to conduct data collection and reporting using HMIS that meets HUD HMIS data standards, regardless of ESG-HMIS funding. Subrecipients primarily serving survivors of domestic violence and sexual assault may use a comparable data system and must meet all HUD HMIS data standards and reporting requirements.

Eligible Expenses

Homeless Management Information System (HMIS) expenditures are limited of the total ESG base funding amount which includes outreach, prevention, shelter operations, rapid re-housing, and centralized or coordinated assessment/entry. The ESG Program HMIS Manual.

Eligible HMIS Activities

Reasonable and appropriate costs associated with operating a HMIS for purposes of collecting and reporting data required under this program and analyzing patterns of use of funds are eligible. Eligible costs include the purchase of HMIS software and/or user licenses, leasing or purchasing needed computer equipment for providers and the central server, costs associated with data collection, entry and analysis, and staffing associated with the operation of the HMIS, including training.

Domestic violence shelter service provider costs associated with a comparable system are eligible but must meet all HUD HMIS data standards and reporting requirements.

Ineligible HMIS Activities

HMIS activities that are ineligible include planning and development of HMIS systems, development of new software systems, and replacing current state and local government funding for an existing HMIS.

Administrative Costs

Administrative costs may include accounting for the use of grant funds, preparing reports for submission to DGCD, obtaining program audits, similar costs related to administering the grant after the award, and associated staff salaries. Administrative costs also include staff training for program and case management if this training is directly related to the provision of an emergency crisis response system. As with all billed expenditures, billing for administrative costs must be based on actual costs incurred during a period.

No more than 3% to 7% percent of the total ESG base funding amount may be spent on administrative costs. The base includes planning, outreach, prevention, shelter operations, rapid rehousing, and centralized or coordinated assessment/entry.

While it is not necessary to detail administrative costs on reimbursements, subrecipients must be able to document all administrative costs and will be required to produce said documentation at the time of either on-site or desk monitoring.

ESG-CV Special CARES Act Requirements

CARES Act

The Coronavirus Aid, Relief, and Economic Security Act (CARES Act) provided an additional \$3.96 billion in funding for the ESG program, which was distributed through a formula methodology. The City of Atlanta received a total **\$5,866,829** in ESG-CV Round 1 and Round 2 funding and elected to support Rapid Rehousing. ESG-CV funds must be used 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.

Duplication of Benefits

“Duplication of benefits” occurs when federal financial assistance is provided to a person or entity through a program to address losses resulting from a federally declared emergency or disaster, and the person or entity receives or would receive financial assistance for the same costs from any other source, and the total amount received exceeds the total need for those costs. Recipients must establish and maintain adequate procedures to prevent any duplication of benefits with ESG-CV funds. Note that funds can’t be used for ESG projects.

Eligible Costs

To assist recipients in ensuring that an activity being paid for with ESG-CV funds is eligible, or determining whether annual ESG funding may follow the waivers and alternative requirements established in Notice CPD-20-08, recipients and subrecipients should consider the following: Notice CPD-20-08 states that “these ESG-CV funds must be used 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.”

- a. **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.
- b. **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.
- c. **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 own health at risk to continue to provide necessary services to individuals and families experiencing and risk of homelessness.

Eligible ESG Program Costs for infectious Disease Preparedness includes the following:

- (i) **Operations:** Supplies, Food, Furnishings, Equipment
- (ii) **Essential Services:** Case management, Outpatient services, Transportation
- (iii) **Outreach:** Engagement, Case management, Emergency health services, Transportation
- (iv) **Overhead Costs:** Case Management, Outpatient Health Services, Emergency Health Services
(Overhead Costs related to Street Outreach and Emergency Shelter are eligible costs of those program components)
- (v) **Expanded Staffing and Training:** Training staff on COVID-19 vaccine, hiring additional staff, Providing incentives, Providing training, Providing hazard pay for subrecipient staff, Paying subject matter experts, Purchasing hotel rooms for staff or program participants

- (vi) **Homeless Management Information System (HMIS) costs:** Paying for HMIS enhancements, Data Collection, Reporting

For more detailed information on eligible cost <https://files.hudexchange.info/resources/documents/Eligible-ESG-Program-Costs-for-Infectious-Disease-Preparedness.pdf>

Waivers

A detailed list of all Waivers and Alternative Requirements can be found at <https://www.hudexchange.info/resource/6411/notice-cpd2108-waiver-and-alternative-requirements-for-the-esg-program-under-the-cares-act/>.

Match Requirement

As provided by the CARES Act, ESG-CV funds are not subject to the match requirements that otherwise apply to the Emergency Solutions Grants Program. Annual ESG allocations that are used to prevent, prepare for or respond to coronavirus are not subject to the match requirements.

Administrative Costs

As permitted by the CARES Act, a recipient may use up to 10 percent of its total ESG-CV grant for administrative costs specified in 24 CFR 576.108.

Progressive Expenditure Deadlines and Recapture Provisions

DGCD will regularly monitor expenditures to ensure ESG-CV funds are spent quickly on eligible activities to address the public health and economic crises caused by coronavirus. HUD has established alternative progressive expenditure requirements:

- a. HUD may recapture up to 20 percent of a recipient's total award, including first and second allocation amounts, if the recipient has not expended at least 20 percent of that award by September 30, 2021.
- b. HUD may recapture up to 80 percent of a recipient's total award, including first and second allocation amounts, if the recipient has not expended at least 80 percent of that award by March 31, 2022.
- c. Prior to recapturing funds as described above, HUD will follow the enforcement process described in 24 CFR 576.501 and provide the recipient with an opportunity to provide a spending plan demonstrating to HUD's satisfaction that all of the recipient's ESG-CV funds from the first and second allocations will be expended by September 30, 2022.

Reporting Requirements

HUD requires each recipient of this ESG allocation, referred to as ESG-CV, to submit reports quarterly. ESG-CV recipients will submit their reports through the Sage HMIS Reporting Repository. Detailed information on creating user accounts, generally working in Sage, and complete CSV HMIS data reporting is found in the ESG CAPER Guidebook accessible through the HUD Exchange and via the RESOURCES tab in Sage. Reports will be due 30 calendar days after the quarter ends. The reporting schedule and due dates are as follows:

ESG-CV Report Submissions	Due Date
Start to September 30, 2020	October 30, 2020
October 1, 2020 to December 31, 2020	January 30, 2021
January 1, 2021 to March 31, 2021	April 30, 2021
April 1, 2021 to June 30, 2021	July 30, 2021
July 1, 2021 to September 30, 2021	October 30, 2021
October 1, 2021 to December 31, 2021	January 30, 2022
January 1, 2022 to March 31, 2022	April 30, 2022
April 1, 2022 to June 30, 2022	July 30, 2022
July 1, 2022 to September 30, 2022	October 30, 2022
Any extensions will be noted in the CAPER and AAP submissions for FY 2021 and FY2022	

Per DBGC’s Standard Operations Procedures for Reporting for Partner Agency Contact must:

- Attend all required reporting trainings, notification shall be sent in writing in a timely manner or there may be times information may need to be provided as soon as possible.
- Submit monthly accomplishment reports to DGCD’s Management Analyst(s) and Compliance Specialist(s). The Management Analyst(s) shall obtain the information from the partnering agencies. The Management Analyst(s) is responsible for providing the monthly accomplishment reports to Compliance Specialist(s). Also, the reporting form may also capture any concerns, challenges, etc., provide a space for comments.
- Resubmit accomplishment report if errors or inaccuracies are identified.