

Emergency Solutions Grant COVID-19 (ESG-CV) Client Eligibility and Eligible/Ineligible Costs for Homelessness Prevention

The Emergency Solutions Grant (ESG) Program Rule (24 CFR Part 576) outlines the costs that are eligible under the ESG program. This reference document summarizes the eligible cost guidance from the Rule and augments that information with clarifications from HUD and other funders and HUD guidance on ESG-CV funds. As the recipient of the ESG-CV funds, the City of Columbus may impose additional restrictions on the use of funds.

CLIENT ELIGIBILITY

Eligibility is based on 1) housing status, 2) household income, 3) the need for assistance, and 4) applicability of eviction moratoria. A helpful graphic from HUD on eligibility is available [here](#).

Eligibility Requirements	Details	Required Documentation
Housing Status	<p><u>Category 1c</u>: The household's right to occupy housing will be terminated within 21 days</p> <p><u>Category 2</u>: The household must physically vacate the unit within 14 days as a result of an eviction action</p> <p><u>At risk of homelessness</u>: 1) the household has moved because of economic reasons 2 or more times during the 60 days immediately preceding program entry; 2) is living in the home of another because of economic hardship; 3) has been notified in writing that their right to occupy housing or living situation will be terminated within 21 days; 4) lives in a hotel/motel and the cost is not paid by other programs; 5) lives in an SRO or efficiency where more than 2 persons live, or lives in a unit where more than 1.5 persons per room live; 6) is exiting a publicly funded institution or system of care; or 7) lives in unstable housing with an increased risk of homelessness.</p>	<p><u>Category 1c</u>: Written notification from the landlord or host home of termination, including the date of termination</p> <p><u>Category 2</u>: Court order from an eviction action requiring household to vacate residence within 14 days or notice equivalent to an eviction action under state law or notice to quit or notice to terminate under state law</p> <p><u>At risk of homelessness</u>: Written notification from the landlord or host home of termination, including the date of termination; hotel/motel receipt; exit documentation from a system of care; or client self-certification if documentation is not available.</p>
Household Income	At or below 50% of the average median family income (AMI) for Columbus and Franklin County	CSB Direct Client Assistance (DCA) application
Need for assistance	Assistance is necessary to help the program participant regain stability in their current permanent housing or move into other permanent housing and achieve stability in that housing AND the household lacks sufficient resources or support networks immediately available to prevent them from entering emergency shelter or a place not meant for human habitation.	<p>Client self-certification is sufficient documentation of a lack of sufficient resources or support networks and that no subsequent residence has been identified</p> <p>Imminent loss of housing should be documented by eviction notices or emails/letters from landlords or hosts that includes the date that the household will lose access to housing</p>

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	<p>Indications that assistance is necessary include: 1) the household has moved because of economic reasons 2 or more times during the 60 days immediately preceding program entry; 2) is living in the home of another because of economic hardship; 3) has been notified in writing that their right to occupy housing or living situation will be terminated within 21 days; 4) lives in a hotel/motel and the cost is not paid by other programs; 5) lives in an SRO or efficiency where more than 2 persons live, or lives in a unit where more than 1.5 persons per room live; 6) is exiting a publicly funded institution or system of care; or 7) lives in unstable housing with an increased risk of homelessness.</p>	<p>Hotel/motel stays should be documented by receipts</p>
<p>Eviction moratoria</p>	<p>Landlords cannot evict tenants for non-payment of rent if the client submits a signed declaration confirming that they meet the conditions in the CDC eviction moratorium order. If the household meets the conditions, they cannot be evicted and are not eligible for homelessness prevention assistance.</p> <p>If the landlord evicts the household in violation of the CDC order and Legal Aid cannot help, the household is eligible for homelessness prevention assistance</p> <p>A client who is not on the lease and is being forced to leave by the leaseholder within 14-21 days is eligible for homelessness prevention assistance regardless of whether eviction moratoria are in effect</p>	<p>Contact CSB if you need a sample declaration form for the CDC moratorium</p> <p>The <u>CDC moratorium</u> expired 7/31/2021</p>

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ELIGIBLE AND INELIGIBLE COSTS

HOMELESSNESS PREVENTION (24 CFR 576.103, 576.105, 576.106, 576.400) – Housing relocation and stabilization services and short-and/or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or a place not meant for habitation.	
Eligible Costs	Notes and Resources
Housing relocation and stabilization services	<p>The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant’s current permanent housing or move into other permanent housing and achieve stability in that housing.</p> <p>Eligible relocation and stabilization costs are outlined in the ESG-CV Eligible and Ineligible Costs matrix for RRH.</p> <p>Transportation costs for the purpose of helping a program participant obtain and maintain housing are eligible, including bus passes and transit tickets; mileage for case managers who use their own vehicles; the cost of purchasing or leasing a vehicle for program participant transport and the cost of gas, insurance, taxes, and maintenance for that vehicle; and travel costs for case managers helping program participants use public transportation. Taxis and rideshare services are eligible as long as the costs are reasonable and appropriate and other transportation options are not available or reasonable for the program participant.</p>
Rental assistance	<p>Eligible rental assistance costs are outlined in the ESG-CV Eligible and Ineligible Costs matrix for RRH.</p> <p>Rent and utilities can exceed the federal Fair Market Rent with CSB approval, justification related to COVID-19, and a lease dated between 3/31/2020 and 6/30/2022. Rent and utilities should be within FMR for households to promote long-term affordability. Rents and utilities over FMR will only be approved in rare, specific cases.</p>
Habitability and lead-based paint requirements (visual assessment, warning statement, and pamphlet acknowledgment)	<p>If a household moves into new housing using ESG-CV funds, habitability inspections must be completed prior to move-in.</p> <p>Inspections can be conducted in person, completed and certified by the landlord, or completed using technology (such as dated video or photos).</p> <p>Sub-recipients that own their property cannot conduct inspections.</p> <p>Lead-based paint requirements are required for units built before 1978 and where a child under the age of 6 or a pregnant woman can be living or spending time.</p> <p>Habitability Inspection Form Lead-based paint resources</p>
Personal protective equipment for program participants	
Vaccine incentive payments	<p>Direct cash payments of up to \$50 per dose, only if other vaccine incentives are unavailable or inaccessible.</p>
Renters insurance	<p>Payment must be necessary to obtain or maintain housing (e.g., the landlord requires insurance and partners pay the insurance company directly (not the client)).</p>
Staff costs	<p>The costs of labor, supplies, and materials incurred by the sub-recipient in directly providing services to program participants.</p>

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	<p>The salary and benefit packages of staff who deliver the services.</p> <p>Additional hazard pay for staff working directly to prevent, prepare for, and respond to COVID-19 among people experiencing or at risk of homelessness.</p> <p>Work-related telephone, cell phone, and internet services for staff who deliver services.</p> <p>Community meeting expenses directly related to service provision.</p> <p>Training on infectious disease prevention and mitigation for staff working directly to prevent, prepare for, and respond to COVID-19 among people experiencing or at risk of homelessness.</p> <p>Volunteer incentives (cash or gift cards)</p>
Ineligible Costs	Notes and Resources
Furnishings or furniture referral fees for program participants	Delivery fees or moving costs to assist a program participant transport donations from a furniture bank or thrift store to their new home are eligible, as long as payment to purchase the furniture itself is not included. Furniture owned by partner agency is eligible as long as it doesn't stay with the client after exiting the program.
Cell phones with internet capability	Phones must be owned by partner agency, used by program participants for activities necessary to obtain or maintain housing, and cannot stay with the program participant after they exit the program. Service plans must be in the partner's name, not the program participants.
Transportation costs	Clients personal vehicle payments, repair costs, maintenance, insurance, and gas (or gas cards). Only travel expenses to help clients obtain and maintain housing are eligible.
Costs that were incurred outside the contract period or not mentioned above	

ADMINISTRATIVE (24 CFR 576.108) – Costs related to the planning and execution of ESG activities	
Eligible Costs	Notes and Resources
General management, oversight, and coordination	<p>Salaries, wages, and related costs of the recipient's staff, the staff of subrecipients, or other staff engaged in program administration. The sub-recipient may either include the entire salary, wages, and related costs allocable to the program of each person whose primary responsibilities with regard to the program involve program administration assignments, or the pro rata share of the salary, wages, and related costs of each person whose job includes any program administration assignments. The recipient may use only one of these methods for each fiscal year grant.</p> <ul style="list-style-type: none"> < Preparing program budgets and schedules, and amendments to those budgets and schedules < Developing systems for assuring compliance with program requirements < Developing interagency agreements and agreements with subrecipients and contractors to carry out program activities < Monitoring program activities for progress and compliance with program requirements < Preparing reports and other documents directly related to the program for submission to HUD < Coordinating the resolution of audit and monitoring findings < Evaluating program results against stated objectives < Managing or supervising persons who conduct administrative activities

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	<p>Travel costs incurred for monitoring of sub-recipients.</p> <p>Administrative services performed under third-party contracts or agreements, including general legal services, accounting services, and audit services.</p> <p>Other costs for goods and services required for administration of the program, including rental or purchase of equipment, insurance, utilities, office supplies, and rental and maintenance (but not purchase) of office space.</p>
Training on ESG requirements	Costs of providing training on ESG requirements and attending HUD-sponsored ESG trainings
Staff costs	<p>The costs of labor, supplies, and materials incurred by the sub-recipient in directly providing administrative services.</p> <p>The salary and benefit packages of staff who deliver the services.</p> <p>Work-related telephone, cell phone, and internet services for staff who deliver services.</p> <p>Community meeting expenses directly related to service provision.</p>
Ineligible Costs	Notes and Resources
Staff and overhead costs directly related to carrying out homelessness prevention activities	Direct staff and overhead costs related to carrying out homelessness prevention activities are eligible as part of those activities and are not administrative costs
Costs that were incurred outside the contract period or not mentioned above	
Administrative costs are only eligible if specifically designated in your grant agreement	