Emergency Solutions Grant COVID-19 (ESG-CV) Eligible/Ineligible Costs for Rapid Re-Housing

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. As the recipient of the ESG-CV funds, the City of Columbus may impose additional restrictions on the use of funds.

RAPID RE-HOUSING (24 CFR 576.104 576.105, 576.106, 576.400) – Housing and stabilization services and short- and/or medium-term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing.	
Eligible Costs	**Notes and Resources**
Financial assistance	Payment to housing owners, utility companies, and other third parties for: 〈 Rental application fees 〈 Security deposits equal to no more than 2 months' rent 〈 Last month's rent paid with the security deposit and first month's rent, not to exceed the cost of one month's rent 〈 Utility deposits 〈 Utility payments for gas electric, water, and sewage, including up to 6 months of utility payments in arrears, per service, for utilities in the program participant's name. 〈 Moving costs, including temporary storage fees for up to 3 months
Rental assistance	12-month cap on rental assistance Each program participant must have a binding, legal lease between the owner and the participant. The lease term must be at least 6 months. The lease must be terminable for cause and comply with Violence Against Women Act requirements. CSB recommends that leases are automatically renewable upon expiration for at least 1 month, except on prior notice by either party. Rent and utilities can exceed the federal Fair Market Rent with CSB approval, justification related to COVID-19, and a lease dated between 3/31/20 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. Rent and utilities must be reasonable in relation to other rents in the area. Rental assistance must be paid to the landlord, not the program participant. Unit size is not limited by household size. Unit occupancy must be reasonable and appropriate. Each resident must be afforded adequate space and security for themselves and their belongings and an acceptable place to sleep. Participants must be able to sustain rent and utilities after rental assistance ends. Payment of rental arrears is eligible, limited to one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears HUD FMRs Federal Fair Market Rent and Rent Reasonableness Regulations Fair Market Rent and Rent Reasonableness Calculator Utility Allowances

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Habitability and lead-based paint requirements (visual assessment, warning statement, and pamphlet acknowledgment)	Habitability inspections must be completed prior to move-in. Inspections can be conducted in person, completed and certified by the landlord, or completed using technology (such as dated video or photos). Sub-recipients that own their property cannot conduct inspections. 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. Habitability Inspection Form Lead-based paint resources
Housing search and placement	Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing, including: 〈 Assessment of housing barriers, needs, and preferences 〈 Development of an action plan for locating housing and housing search 〈 Outreach to and negotiation with owners 〈 Assistance with submitting rental applications and understanding leases 〈 Assessment of housing for compliance with ESG requirements for habitability, lead-based paint, and rent reasonableness 〈 Assistance with obtaining utilities and making moving arrangements 〈 Tenant counseling
Housing stability case management	Assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing. 〈 Using the centralized or coordinated assessment system to evaluate individuals and families applying for or receiving homelessness prevention or rapid re-housing assistance 〈 Conducting the initial evaluation, including verifying and documenting eligibility 〈 Conducting re-evaluations of eligibility and service needs every 90 days 〈 Counseling 〈 Developing, securing, and coordinating services and obtaining Federal, State, and local benefits 〈 Monitoring and evaluating program participant progress 〈 Providing information and referrals to other providers 〈 Developing an individualized housing and service plan, including planning a path to permanent housing stability Virtual case management by phone or electronically is encouraged during the COVID-19 pandemic.
Mediation	Mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the program participant from losing permanent housing in which the program participant currently resides.
Legal services	Hourly fees for legal advice and representation by attorneys licensed and in good standing with the bar association of the State and by person(s) under the supervision of the licensed attorney, regarding matters that interfere with the program participant's ability to obtain and retain housing.

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	ESG funds may be used only for these services to the extent that other appropriate legal services are unavailable or inaccessible within the community. Eligible subject matters are: 〈 child support 〈 guardianship 〈 paternity 〈 emancipation 〈 legal separation 〈 orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking 〈 appeal of veterans and public benefit claim denials 〈 resolution of outstanding criminal warrants 〈 landlord/tenant matters Component services or activities may include client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling. Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the subrecipient's employees' salaries and other costs necessary to perform the services.
Credit repair	Credit counseling and other services necessary to assist participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving credit problems.
Staff costs	The costs of labor, supplies, and materials incurred by the sub-recipient in directly providing services to program participants. The salary and benefit packages of staff who deliver the services. Additional hazard pay for staff working directly to prevent, prepare for, and respond to COVID-19 among people experiencing or at risk of homelessness. Work-related telephone, cell phone, and internet services for staff who deliver services. Community meeting expenses directly related to service provision. 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. Volunteer incentives (cash or gift cards)
Ineligible Costs	**Notes and Resources**
Rental assistance	Rental assistance is capped at 12 months. Rental assistance to a program participant who is receiving tenant-based rental assistance or living in a housing unit receiving project-based rental assistance or operating assistance through other public sources. Rental assistance to a program participant who has been provided with replacement housing payments under the URA during the period of time covered by the URA payments. Eviction costs, including landlord eviction fees

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Utilities	Utility assistance is capped at 12 months.
Moving costs	Temporary storage fees accrued prior to the date the program participant began receiving assistance Temporary storage fees in arrears
Housing stability case management	Assistance cannot exceed 30 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing.
Debt	Payment or modification of debt
Financial assistance	Assistance to a program participant who is receiving the same type of assistance through other public sources.
Household items	Bedding, linens, kitchen supplies
Costs that were incurred outside the contract period or not mentioned above	

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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	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. 〈 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 Travel costs incurred for monitoring of sub-recipients. Administrative services performed under third-party contracts or agreements, including general legal services, accounting services, and audit services. 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.
Training on ESG requirements	Costs of providing training on ESG requirements and attending HUD-sponsored ESG trainings
Staff costs	The costs of labor, supplies, and materials incurred by the sub-recipient in directly providing administrative services. The salary and benefit packages of staff who deliver the services. Work-related telephone, cell phone, and internet services for staff who deliver services. Community meeting expenses directly related to service provision.
Ineligible Costs	**Notes and Resources**
Staff and overhead costs directly related to carrying out RRH activities	Staff and overhead costs directly related to carrying out RRH activities are eligible as part of those activities
Costs that were incurred outside the contract period or not mentioned above.	
Administrative costs are only eligible if specifically designated in your grant agreement	