

ESG Frequently Asked Questions

Application Guidance

Q: Is there a recommended strategy for determining the amount of ESG funding to request?

A: Build your budget around your activity, how it meets regional needs, and what it takes to support it as well as available matching funds (1:1 match requirement).

Q: Can applicants apply for ESG funds before receiving a Minimum Habitability Standards approval?

A: Yes, but include a timeline and operational details.

Q: Who is responsible for conducting Minimum Habitability Standards inspections?

A: Qualified code enforcement or certified partners. Applicants must show the facility is safe and habitable.

Q: How should we address audit and financial capacity scoring for new 501(c)(3)s?

A: Explain financial structure, duties, partnership history, and compliance plans.

Q: If we apply under a city umbrella, what must we include?

A: The city is the lead applicant. Include clear roles, responsibilities, agreements, and service coverage details.

Q: Can Emergency Shelters serve people at risk of homelessness?

A: Only those at “imminent risk of homelessness” as defined by 24 CFR 576.2. Must show loss of housing within 14 days, no other residence, and no support network.

Q: Does ADFA oversee any CoCs?

A: No. ADFA is a required participant but not the lead agency for CoCs.

Q: What date should be listed on the SF-424 form?

A: Final dates may change with HUD guidance but should reflect the term of the grant currently applying for.

Q: Can a CoC non-profit apply for HMIS-only funding?

A: Yes, if it's the only entity administering HMIS. Other CoC partners may also apply through coordinated plans.

Q: Can the proposed budget include a habitability standards consultant?

A: Yes, but habitability must be met before reimbursement. Consultants may ensure compliance before applying.

Q: Are nonprofit applicants required to be 501(c)(3)?

A: Yes.

Q: What PiT count data should be used for the application?

A: Use the most recent certified Point-in-Time (PiT) data available.

Grant Operations: Invoicing & Match Requirements

Q: Can we submit a \$0 invoice and still bill later for that month?

A: Yes, as long as expenditures must have occurred within 100 calendar days of the invoice submission date.

Q: What is the turnaround time for receiving payments after submission?

A: It can take two weeks if the draw request is clean and submitted on time (and monthly) and up to 30 days. Delays can occur with errors or infrequent submissions. We recommend submitting prior to the 10th if able in order to expediate payment.

Q: Can we submit match info without a draw request?

A: No, match should accompany a monetary draw request.

Q: Can we submit match from January in the July invoice?

A: Yes, if the match meets HUD requirements and falls within the grant period.

Q: How do we request budget changes within ESG categories?

A: Submit a request to ADFA with justification and planned budget changes.

Q: What documentation is needed for staff reimbursement?

A: Only timesheets are required beyond the employee time tracking tab.

Q: How do we track volunteer time for match?

A: Use a signed log with name, date, hours, activity, and a reasonable hourly rate as per 2 CFR §200.306(e) and 24 CFR §576.201.

Q: When does the grant period begin?

A: October 1, 2025.

Q: On draw request forms, should 'Reimbursement Requested' be 50% of 'Amount Paid'?

A: Yes. 'Amount Paid' is the full amount you've paid and 'Reimbursement Requested' is what you are requesting.

Q: Are ADFA payments by check or direct deposit?

A: Direct Deposit. Please contact HORNE or ADFA directly if this is an issue.

Q: Is match start date different from expense start date?

A: Yes, only for the 2024-2025 grant year. Match starts December 17, 2024 and expense start date is June 1, 2025. For the 2025-2026 grant year, both dates will be October 1, 2025-September 30, 2026.

Q: What proof is needed for Emergency Shelter rent costs?

A: Lease and a cancelled check can be used if no receipt is available. Lease must show monthly rent and shelter use.

Q: Can the required match funds for ESG-funded facility rehabilitation consist of operational and staffing expenses?

A: Yes, depending on the situation. Operational and staffing expenses can be considered match if they support the facility, with a 1-for-1 match when rehabilitation is at the same level as operating.

Q: Can owned property be used as ESG match?

A: Generally yes, using Fair Market Value if tied to rehabilitation. Detailed justification must be provided.

Q: Can agency-owned property be used as match?

A: Generally no, unless the use of the property is tied to eligible services or activities. Contact HORNE for specific guidance: ArkansasESG@horne.com

Q: Can case management and shelter be in different counties?

A: Yes, if both counties are in the same CoC. Otherwise, submit separate applications.

Q: Do tangible donations count toward match?

A: Yes. Cash, in-kind, and donations are eligible if properly documented and trackable.

HMIS & Reporting Requirements

Q: Do we need to pay HMIS license fees this year?

A: ADFA paid HMIS license fees for the current contract year. However, agencies will need to pay for HMIS licenses starting October 2025.

Q: Is the client number the HMIS number?

A: Yes.

Q: How do agencies using Osnium submit HMIS data?

A: If Osnium is comparable, it may be acceptable.

Q: Can HMIS vendors be used for DV shelters?

A: Yes, if the vendor is capable. Details must be reviewed for compliance.

Q: Will ADFA pay for HMIS license fees?

A: ADFA plans to cover HMIS fees this year, pending final HUD guidance.

Grant Operations & Compliance

Q: What is the agreement date between ADFA and HUD?

A: For the 2024-2025 grant year, December 17, 2024.

Q: How should we list anonymous donors?

A: List 'Anonymous Donor' with a description of the donation. Keep supporting documentation in your files for audit purposes.

Q: Can a QuickBooks report without donor names be used?

A: Yes.

Q: How does overlap between grant years work?

A: Current grant ends May 2026; the upcoming grant will be Oct 1, 2025-Sept 30, 2026. These will be two separate grants meaning each involves a separate application and agreement, no overlap/double-dipping may occur.

Q: When should monthly submissions begin?

A: Invoices are due by the 10th of the following month expenses were incurred (Invoices can be submitted prior to the 10th) and after your grant agreement has been executed.

Q: Can DV shelters confirm their own habitability standards?

A: Yes, if verified by a qualified person and documented for compliance.

Q: Can a recreational vehicle (RV) be used as a form of housing under the RRH or HP components?

A: No. According to 24 CFR Part 3282, RVs are designed only for recreational use and not as a primary residence or for permanent occupancy.

Q: Will awards be retroactive to October 1?

A: Typically, yes but for 2024-2025 grant, the term is June 1, 2025- May 31, 2026. Please refer to your subrecipient agreement for details.

Q: Is NSPIRE training required for minimum standards inspection?

A: NSPIRE standards will begin October 1, 2025.

Q: Who do we contact for general questions/for help once the grant opens?

A: Email ArkansasESG@horne.com for assistance.

Q: How do we find our CoC or get involved?

A: Your organization should be participating with the CoC. You can find contact info at: <https://adfa.arkansas.gov/wp-content/uploads/2025/05/CoC-map-with-contact-info-5.27.25.pdf>

Q: Can we use volunteer hours as in-kind match?

A: Yes. Volunteer time is an allowable in-kind match if properly documented per federal guidance.

Q: What if our organization doesn't have financial records going back 5 years?

A: Submit the most recent audit or financials you have available, along with a Statement of Financial Position and Statement of Cash Flows if applicable.

Q: What is the typical turnaround time for CoC review?

A: This will vary by CoC. Please contact your CoC directly for their estimated response timeline.

Q: Should we contact our CoC about application format and submit to them directly?

A: Yes, reach out to your CoC to confirm their format and email your application to them. ADFA will not forward it on your behalf.

Q: Are 2025 dates acceptable on partnership letters?

A: Yes, recent letters dated 2025 are acceptable.

Q: Can the SF-424 form be accessed online?

A: Yes, the SF-424 form is available in the application portal.

Q: Is there a place in the application to enter match information?

A: Yes, there is a dedicated section in the application to enter your match details.

Q: Are applicants required to do all ESG activities, or can we just apply for one?

A: You are not required to apply for all activities. You may choose only the component(s) you wish to implement, such as Street Outreach or Emergency Shelter.

Q: We have used ESG before, but not since 2019. Is our provider number still valid or should we get a new one?

A: Please email Alisa Green at alisa.green@arkansas.gov to confirm if you need a new provider number. You may also complete a new [ESG Provider Setup Form](#) if necessary.