ADFA
ARKANSAS DEVELOPMENT FINANCE AUTHORITY

Emergency Solutions Grant Arkansas Development Finance Authority Emergency Solutions Grant (ESG) Policies and Procedures

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EQUAL HOUSING OPPORTUNITY

Version Control

Version history is tracked in the Version History Table (page i), with notes regarding version changes. Dates of each publication are also tracked in this table.

Substantive changes in this document that reflect a policy change will result in the issuance of an updated version of the document. For example, a substantive policy change after the issuance of Version 1.0 would result in the issuance of Version 2.0, an increase in the primary version number. Non-substantive changes such as minor wording and editing or clarification of existing policy that do not affect interpretation or applicability of the policy will be included in minor version updates denoted by a sequential number increase behind the primary version number (i.e., Version 2.1, Version 2.2, etc.).

Policy Change Control

Policy clarifications, additions, or deletions may be needed during the program to more precisely define the rules by which the Program will operate. Policy decisions will be documented and will result in the revision of the document in question; unless otherwise noted, policy revisions are applied prospectively, made effective on the date of document approval.

Version Number	Date	Summary of Changes	Approved By
1.0	12/5/2024	Initial draft	Susan Gardner
1.1	12/10/24	Rapid Re-Housing, Homelessness Prevention, BABA, Policies and Procedures Certification	Susan Gardner
1.2	5/6/2025	Match, performance period, monthly reporting, HMIS documentation, Policies and Procedures Certification, NSPIRE Standards	Susan Gardner
1.3	6/9/2025	Breakdown of rental/financial assistance on Expenditures and Funds Request Form, File naming convention, CPD manual for compliance	Susan Gardner
1.4	6/17/2025	CAPER requirement from monthly to annual	Susan Gardner
1.5	10/10/2025	Administrative Budget Alignment with Expenses	Lori Brockway
1.6	1/08/2026	Retainer Fee/ Budget Flexibility	Lori Brockway
1.7	3/13/2026	Budget Revisions and Extensions	Lori Brockway
1.9	9/25/2026	Match Policy/Budget Flexibility/ Closeout Checklist/ ADA language, HMIS requirement language	Lori Brockway

Table 1: Version Control Table

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1. Introduction

This Arkansas Development Finance Authority Emergency Solutions Grant (ESG) Policies and Procedures Manual (the Manual) is intended to give guidance to subrecipients using Emergency Solutions Grant (ESG) funding to carry out eligible activities and meet federal and state requirements of the ESG program. Guidance for the program is not limited to this document, though the Manual is the primary resource.

2. Program Overview

The ESG program is designed to assist individuals and families who have or are currently experiencing homelessness or housing crisis to regain housing stability. Activities geared towards this goal and eligible for ESG funding include emergency shelter, rapid re-housing, street outreach, and homelessness prevention.

2.1 Roles and Responsibilities

ESG funds are awarded to the State of Arkansas by the U.S. Department of Housing and Urban Development (HUD) through the Arkansas Development Finance Authority (ADFA). ADFA distributes these funds to areas of need throughout the State by awarding sub-grants in accordance with federal regulations as described in this manual.

The ESG program in Arkansas is administered by ADFA under the provisions of:

- Arkansas statutory authority;
- All applicable local, state, and federal laws;
- The Stewart B. McKinney Homeless Assistance Act of 1987, Title IV, Subtitle B, as amended (42 U.S.C. 11371 et seq.);
- HUD regulations found at 24 CFR Part 576;
- Uniform Administrative Requirements at 2 CFR Part 200;
- The requirements of this Manual;
- The terms and conditions of ESG subrecipient agreements; and
- Any subsequent HUD and/or ADFA policy memos, regulations, communications, and guidance.

ESG subrecipients are required to comply with the most current version of this Manual and federal regulations as a condition of each sub-grant award.

The State has flexibility in certain areas of administering the ESG Program and may impose more rigorous standards than those required by HUD. In any instance where the Manual differs from the HUD Regulations found at 24 CFR 576, subrecipients must both minimally meet HUD standards and follow the Manual where more rigorous requirements have been introduced. Subrecipients are encouraged to contact ADFA with questions or for assistance navigating this Manual.

2.2 Eligible Applicants

Eligible applicants for the ESG program include:

- Units of local government
- Units of general purpose
- Private non-profit organizations (NPO)

2.3 Award Match

In accordance with 24 CFR 576.201, subrecipients are required to match ESG funds with a one-to-one, or 100%, match from other sources. The match may originate from private sources or from local, state or non-ESG federal sources, as long as the laws governing the public monies do not prohibit such use and as long as the ESG sub-grant was not used as match for the other public funds. The matching contributions must be provided after the date that HUD signs the grant agreement.

Failure to provide properly documented match funds will require repayment of all unmatched reimbursements.

Matching funds may be used only once. Funds used to match a previous ESG grant may not be re-used to match a subsequent ESG sub-grant. Funds that have been used as match for any other grant cannot also be used as the ESG match. Matching funds can be cash or in-kind contributions and must be provided after the date that HUD signs the grant agreement. Whether cash or in-kind, the match must meet all ESG requirements and must be certified by the subrecipient's Executive Director or the equivalent with authority to bind the subrecipient on the approved ADFA ESG Match Certification Form.

Match may be calculated in the following ways:

a. *Cash contributions*: Calculate the cash expended for allowable costs under the ESG program from a source that meets the match requirements listed above;
b. *Non-cash contributions:* Calculate the value of any real property, equipment, goods, or services contributed to the subrecipient's ESG program, provided that if the subrecipient had to pay for them with grant funds, the costs would have been allowable. Noncash contributions may also include the fair market value of any real property donated to the subrecipient after the date that HUD signs the grant agreement with the State.
    a. To determine the value of any donated material or building, or of any lease, the subrecipient must use a method reasonably calculated to establish the fair market value.
    b. To determine the value of any donated services, the subrecipient must value the donated time at the prevailing minimum wage except when volunteers perform duties that are professional in nature. Examples of professional services would include donated legal services, medical or mental health services, engineering services, etc.
    c. For volunteered professional services, the subrecipient may use the hourly rate that the volunteer charges as a professional. If an attorney provides pro bono legal services to the subrecipient, and that attorney's customary billable rate is $150/hour, then each hour of the attorney's pro bono service may be valued at $150. Use this approach only for professional services. If that same attorney volunteered time to paint the shelter or mow the lawn, then the value of those volunteered hours would be calculated at the prevailing minimum wage.
    d. Some noncash contributions are real property, equipment, goods or services that, if the subrecipient had to pay for them with grant funds, the payments would have been indirect costs. Matching credit for these contributions may be given only if the subrecipient has established, along with its regular indirect cost rate, a special rate for allocating to individual projects or programs the value of those contributions.
c. *Costs paid by program income:* Costs paid by program income may be counted as match only if they are eligible ESG costs that supplement the subrecipient's current ESG program.

2.3.1 Unmatched Award Funds

Failure to provide a properly documented match will require repayment of all unmatched reimbursements.

2.4 Subrecipient Budget

Each ESG subrecipient must propose a budget based on the awarded amount and must be approved by ADFA prior to any reimbursable expenditures. Reimbursement will not be made for activities that are not specified in an approved budget, despite eligibility.

Requests for funding adjustments between eligible activities under the same ESG component may be made to ADFA in writing, either through a formal letter or e-mail. Budget adjustment approvals will be provided in a formal letter or email from ADFA.

Requests for funding adjustments between eligible activities under different ESG components, described in Section 3.2, are prohibited.

3. Program Eligibility

3.1 Applicant Eligibility

Applicants must be engaged in an ESG-eligible activity in support of ESG-eligible populations.

In accordance with 24 CFR 576.400(a), Applicants must consult with and be a member in good standing of the ADFA-recognized Continuum(s) of Care (CoC) operating within the applicant's area of service.

Additionally, in accordance with 24 CFR 576.400(b), Applicants must coordinate and integrate, to the maximum extent feasible, ESG-funded activities with other programs targeted to individuals and families experiencing homelessness in the area(s) covered by the CoC.

All NPOs receiving an ESG sub-grant must be governed by a Board of Directors with a minimum of three members that either includes a formerly homeless person or actively solicits input on issues before the Board from homeless individuals, formerly homeless individuals, or persons at risk of homelessness. The Board of Directors must meet at least once quarterly. Quarters for the ESG Program are October- December, January- March, April- June, and July- September, regardless of the fiscal year of the subrecipient. NPOs receiving an ESG sub-grant must operate under the day-to- day supervision of an Executive Director and have at least one paid employee.

In addition to the requirements for a secular NPO, faith-based NPOs receiving an ESG sub-grant must agree to provide assistance that is free of religious instruction, not discriminate against or give preference to any employee or applicant for employment on the basis of religion, and not discriminate against or give preference to any person applying for assistance on the basis of religion.

If the faith-based NPO engages in explicitly religious activities, including activities that involve overt religious content such as worship, religious instruction, or proselytization, they must be performed outside of any part of the ESG activities.

3.2 Eligible Components and Activities

Eligible components and activities for the ESG program according to 24 CFR 576.100 include:

Component	Activity Descriptions and CFR References
Emergency Shelter	24 CFR 576.102 - Activities to improve the quality of shelters and provide access to shelters for those currently experiencing or at-risk of homelessness.
Rapid Re-Housing	24 CFR 576.104 - Activities to quickly re-house and provide financial stabilization for individuals and families currently experiencing or at-risk of homelessness.

Street Outreach	24 CFR 576.101 - Activities associated with engagement of individuals and families experiencing homelessness.
Homelessness Prevention	24 CFR 576.103 - Activities to prevent individuals and families at risk of homelessness from losing access to housing.
Homeless Management Information System (HMIS)	24 CFR 576.107 - Funds associated with collection of and inputting data on individuals and families who are experiencing homelessness and at-risk of experiencing homelessness.
Administration	24 CFR 576.108 - The Administration component is intended to help ESG subrecipients defray certain Program Administration Costs (PACs) incurred as a result of ADFA requirements.

3.3 Ineligible Activities

Certain activities are ineligible for reimbursement with ESG funds under federal regulation, state statute, or ADFA policy. The following sections list activities that are ineligible under any component of ESG, as well as activities that are ineligible under some components but eligible under others. Section 3.3.1 below provides a list of all ineligible activities. To find information about which activities are ineligible under each specific component (in addition to the items listed in Section 3.3.1), please see their respective sub-sections under Section 4 – Eligible Program Services and Activities.

3.3.1 Ineligible under All ESG Components

The following activities are ineligible for the ESG program under any component:

- Depreciation, bad debts, and late fees (except under arrears for Rapid Rehousing/Homelessness Prevention rental assistance);
- Recruitment, non-HUD staff training, entertainment, non-HUD conferences, and retreats;
- Public relations or fundraising;
- Any activities not explicitly detailed in the regulations;
- Payment of participant credit card or other consumer debt;
- Payment of participant mortgage costs and mortgage arrears;
- Acquisition of real property;
- New construction;
- Property clearance or demolition;
- Costs associated with the organization rather than the project (advertisements, pamphlets about organization, surveys, etc.);
- Salary of case management supervisor when not working directly on participant issues (unless charged to administration);
- Advocacy, planning, and organizational capacity building;
- Transportation costs not directly associated with service delivery (see eligible activities for specific details on eligible transportation costs);
- Legal services for immigration and citizenship matters;
- Substance abuse treatment services for inpatient detoxification and other inpatient drug or alcohol treatment;
- Cash assistance to participants;
- Financial assistance to a household for a purpose and time period supported by another public source (unless it is 6 months or less of arrears under Rapid Rehousing/Homelessness Prevention);
- Payment or modification of a participant credit card and other debts (excluding arrears, when supported under Rapid Rehousing/Homelessness Prevention).

3.4 Eligible Program Participants

Eligible program participants include:

- Literally Homeless: individuals and families living on the street or in emergency shelter;
- Imminently homeless: will be homeless within 14 days;
- Unaccompanied youth/families who meet other federal definitions of homeless and additional criteria required by HUD;
- Individuals and families fleeing or attempting to flee domestic violence; and
- At risk of homelessness as defined by HUD.

The following chart illustrates which populations may be served by each ESG eligible activity:

	Homelessness Definitions				
Eligible Activity	Literally Homeless	Imminent Risk of Homelessness	Homeless under other Federal Statutes	Fleeing Domestic Violence	Meets the definition of "At Risk"
Street Outreach	Yes	No	No	Yes	No
Emergency Shelter	Yes	Yes	Yes	Yes	No
Rapid Rehousing	Yes	No	No	Yes	No
Homelessness Prevention	No	Yes	Yes	Yes	Yes

Table 2: Eligible Activities for each Definition of Homelessness

Within each eligible activity, services may be targeted toward specific sub-populations of eligible participants, particularly in areas with an identified large percentage of a particular sub-population experiencing homelessness. For example, services designed for veterans in areas with large populations of veterans experiencing homelessness.

4. Eligible Program Services and Activities

The ESG program serves program participants via six main eligible activities. Each activity includes a subset of eligible activities and services. Eligible activities to assist individuals and families experiencing or at risk of homelessness include Emergency Shelter, Rapid Re-Housing, Street Outreach, and Homelessness Prevention. Funding associated with the Homeless Management Information System and administrative costs are also discussed in this section.

ESG subrecipients can determine participant eligibility for activities and/or services by starting with asking "Where did you sleep last night?"

The table below provides a guide to services potential participants may be eligible for.

Participant Eligibility by Prior Residence					
	Emergency Shelter Services	Emergency Shelter Operations	Rapid Re-Housing	Street Outreach	Homelessness Prevention
Street/car/ park	Yes	Yes	Yes	Yes	No
Emergency Shelter	Yes	Yes	Yes	No	No
Institution (90 days or less)[1]	See Section 4.1	Yes	Yes	No	No
Motel (paid by charity or government)	Yes	Yes	Yes	No	No
Motel (paid for by Participant)	No	Yes	No	No	Yes
Doubled up / couch surfing	No	Yes	No	No	Yes
At risk[2]	No	Yes	No	No	Yes
Domestic violence shelter	Yes	Yes	Yes	No	No
Fleeing domestic violence	No	Yes	No	No	Yes

Table 3: Participant Eligibility by Prior Residence

4.1 Emergency Shelter

Funding for emergency shelters to make them safe, available, and viable so individuals and families experiencing homelessness have access to a safe place to sleep at night are eligible costs. ADFA encourages subrecipients to provide above the basic requirements by providing safe, temporary, all-day residences to individuals and families experiencing homelessness who need a home base to find employment, connect with services, and obtain permanent housing. Shelters may also offer daylight-only hours to provide meals, essential services, and refuge from poor weather conditions.

[1] Eligible participants must have been in the institution for less than 90 days **AND** must have been living in a shelter or on the street immediately before entering the institution.
[2] Eligible participants must be at risk of entering a shelter or living on street if assistance is not provided.

Eligible Emergency Shelter Activities include:

- Essential Services: Case management, childcare, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment, transportation, and services for special populations
- Shelter Rehabilitation and Operations: Maintenance, rent, security, fuel, insurance, utilities, food, furnishings, equipment, supplies, and hotel/motel vouchers.

Emergency shelters must meet the minimum safety, sanitation, and privacy standards outlined in Section 12 to be eligible for ESG funding.

Any emergency shelter funded in whole or in part through an ESG sub-grant must meet applicable HUD inspection requirements. A checklist for meeting these requirements is provided in Section 12. Applicants must submit the completed checklist as part of the application and, if funded, the condition of the shelter will be verified during on-site monitoring visits. Shelters that do not meet applicable inspection requirements will be subject to the sanctions outlined in Section 11.1. All inspections must be conducted in accordance with HUD's National Standards for the Physical Inspection of Real Estate (NSPIRE). Subrecipients must ensure staff are trained on NSPIRE requirements and that all inspection policies, procedures, and forms are updated accordingly.

Detailed explanations of each sub-activity eligible under Emergency Shelters are described below:

4.1.1 Essential Services

Essential services are eligible only to program participants defined as Literally Homeless, as defined in 24 CFR Part 576.2.

4.1.1.1 Case Management

Case management entails the process of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of Literally Homeless program participants. Eligible activities and services include:

- Using the required coordinated assessment system;
- Conducting the required initial evaluation that must verify and document eligibility;
- Counseling;
- Developing, securing, and coordinating services and obtaining any federal, state, or local benefits to which the participant is entitled;
- Monitoring and evaluating program participant progress;
- Providing information and referrals to other providers;
- Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and
- Developing an individualized housing and service plan, including planning a path to permanent housing stability.

Reimbursement for case management under the Emergency Shelter component requires the following documentation, which must be included in the site files and uploaded to HMIS when applicable:

- Timesheets for the person(s) performing the case management; and
- Payroll documents for the person(s) performing the case management.

On-site and HMIS files must also include:

- Initial Intake Assessment Form documenting eligibility;
- Case notes;

- Documentation of efforts to connect participants to other resources for supportive services; and
- Housing plans for stability in permanent housing (if applicable).

4.1.1.2 Childcare

In accordance with 24 CFR 576.102(a)(1)(ii), eligible childcare costs includes providing meals and snacks, comprehensive and coordinated sets of appropriate developmental activities. Children covered under childcare services must be under the age of 13. Children with disabilities are covered if under the age of 18.

The childcare center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.

Reimbursement for childcare under the Emergency Shelter component requires the following documentation, which must be included in the site files and uploaded to HMIS when applicable:

- Documentation of costs and associated payments;
- Initial intake assessment form documenting eligibility; and
- License number of the childcare provider.

4.1.1.3 Education Services

The costs of education services to improve knowledge and basic skills, when necessary for the program participant to obtain and maintain housing, are eligible. Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED).

Component services or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies, and instructional material; counseling; and referral to community resources.

Reimbursement for educational services under the Emergency Shelter component requires documentation of costs and associated payments. Additionally, on-site files must also include the Initial Intake Assessment Form to document activity eligibility.

4.1.1.4 Employment Assistance/Job Training

Eligible employment assistance/Job training costs include classroom, online, and/or computer instruction; on-the-job instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. Learning skills include those skills that can be used to secure and retain a job.

Services that assist individuals in securing employment consist of employment screening, assessment, or testing; structured job skills and job-seeking skills; special training and tutoring, including literacy training and prevocational training; books and instructional material; counseling or job coaching; and referral to community resources.

Reimbursement for employment assistance/job training programs under the Emergency Shelter component requires documentation of costs and associated payments. Additionally, on-site files must also include the initial Intake Assessment Form to document activity eligibility.

4.1.1.5 Outpatient Health

Eligible outpatient health costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals. ESG funds may be used only for these services to the extent that other appropriate health services are unavailable within the community.

Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate medical treatment, preventive medical care, and health maintenance services, including emergency medical services; providing medication and follow-up services; and providing preventive and non-cosmetic dental care. Reimbursement for outpatient health services under the Emergency Shelter component requires documentation of costs and associated payments. Additionally, on-site files must also include the initial Intake Assessment Form to document activity eligibility.

4.1.1.6 Legal Services

Eligible legal services costs are the hourly fees for legal advice and representation by attorneys licensed and in good standing with the Arkansas Bar Association, 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.

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, and legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; and appeal of veterans and public benefit claim denials.

Component services or activities may include participant 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 is less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the grantee is a legal services provider and performs the services itself, the eligible costs are the grantee's employees' salaries and other costs necessary to perform the services.

Legal services for immigration and citizenship matters and issues relating to mortgages, retainer fees, and contingency fees are ineligible costs.

Reimbursement for legal services under the Emergency Shelter component requires:

- Initial Intake Assessment Form documenting eligibility
- Documentation that the attorney is licensed with the Arkansas Bar Association, and
- Narrative relating the legal services to matters that interfere with the program participant's ability to obtain and retain housing.

4.1.1.7 Life Skills Training

The costs of life skills training, such as teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance use, and homelessness are eligible costs. These services must be necessary to assist the program participant to function independently in the community.

Component life skills training are budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public transportation, and parenting.

Reimbursement for life skills training under the Emergency Shelter component requires the following documentation, which must be included in site files and uploaded to HMIS when applicable:

- Documentation of costs and associated payments.
- Timesheets and payroll documentation, consistent with requirements for Case Management
- On-site files must also include:
    - Initial Intake Assessment Form documenting eligibility; and
    - Narrative relating the training to skills necessary for the program participant to function independently in the community.

4.1.1.8 Mental Health Services

Eligible mental health services costs are the direct outpatient treatment by licensed professionals of mental health conditions. ESG funds may only be used for these services to the extent that other appropriate mental health services are unavailable or inaccessible within the community.

Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances. Problem areas may include family and marital relationships, parent-child problems, or symptom management.

Eligible treatment consists of crisis interventions; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.

Reimbursement for mental health services under the Emergency Shelter component requires

- Documentation of costs and associated payments.
- On-site files must also include:
    - Initial Intake Assessment Form documenting eligibility;

4.1.1.9 Substance Abuse Treatment

Eligible substance abuse treatment services are designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors and are provided by licensed or certified professionals.

ESG funds may only be used for these services to the extent that other appropriate substance abuse treatment services are unavailable or inaccessible within the community.

Eligible treatment consists of Participant intake and assessment, and outpatient treatment for up to 30 days. Group and individual counseling and drug testing are eligible costs. Inpatient detoxification and other inpatient drug or alcohol treatment are not eligible costs.

Reimbursement for substance abuse treatment under the Emergency Shelter component requires:

- Documentation of costs and associated payments.
- On-site files must also include:
    - Initial Intake Assessment Form documenting eligibility; and
    - Narrative explaining that other appropriate substance abuse treatment services are unavailable or inaccessible within the community

4.1.1.10 Transportation Services

Eligible transportation costs consist of the transportation costs of a program participant's travel to and from medical care, employment, childcare, or other eligible essential services facilities. These costs include the following:

- The cost of a program participant's travel on public transportation;
- If service workers use their own vehicles, mileage allowance for service workers to visit program participants;
- The cost of purchasing or leasing a vehicle for the subrecipient in which staff transports program participants and/or staff serving program participants, and the cost of gas, insurance, taxes, and maintenance for the vehicle; and
- The travel costs of subrecipient to accompany or assist program participants to use public transportation.

Reimbursement for transportation services under the Emergency Shelter component requires:

- Documentation of costs and associated payments.
- On-site files must also include:
    - Initial Intake Assessment Form documenting eligibility;

4.1.1.11 Services for Special Populations

Services for Special Populations are the essential services that have been tailored to address the special needs of homeless youth, the victims of domestic violence and related crimes or threats, and/or people living with HIV/AIDS in emergency shelters.

Reimbursement for services for special populations under the Emergency Shelter component requires all documentation associated with the base service with additional narrative explaining how the service has been tailored to the specific needs of the special population.

4.1.1.12 Renovation, Rehabilitation, or Conversion

If they have *been* included in an approved budget, renovation, rehabilitation, and conversion activities are eligible for reimbursement under ESG's Emergency Shelter component. Buildings renovated, rehabilitated or converted with ESG funds must be maintained as emergency shelters for a minimum of three to 10 years, depending upon the value of the building and the level of improvement. Renovated shelters must remain homeless shelters for a minimum of three years. Rehabilitated or converted shelters must remain shelters for a minimum of 10 years, and this minimum period of use must be enforced by a recorded deed or use restriction.

Reimbursement for renovation, rehabilitation, and conversion activities under the Emergency Shelter component requires:

- Documentation of costs and associated payments.
- Identification of the procurement method followed.

4.1.1.12.1 Renovation

Renovation is "any structural rehabilitation where the associated cost does not exceed 75% of the value of the building before the rehabilitation." The value of the building means the monetary value of the structure before rehabilitation, as determined by an independent real estate appraiser or reasonably established by the recipient (State), ADFA, or its subrecipient, consistent with 24 CFR 576.102.

Renovation costs include:

- Labor, materials, tools, and other costs of improving buildings, including repair directed toward an accumulation of deferred maintenance;
- Replacement of principal fixtures and components of existing buildings;
- Installation of security devices; and

- Improvement through alterations or incidental additions to, or enhancement of, existing buildings, including improvements to make the structure more energy efficient.

Renovations assisted with ESG funding must meet all applicable state and local fire and building codes, electrical codes, plumbing codes, mechanical (HVAC) codes, and energy codes. Shelters renovated with ESG funds must be used as a homeless shelter for a minimum of three (3) years.

4.1.1.12.2 Rehabilitation

Rehabilitation is any structural rehabilitation where the associated cost exceeds 75% of the value of the building before rehabilitation, per 24 CFR 576.102(c)(1)(i). The value of the building means the monetary value of the structure before rehabilitation, as determined by an independent real estate appraiser or reasonably established by the recipient (State), ADFA, or its subrecipient, consistent with 24 CFR 576.102.

Rehabilitation activities assisted with ESG funding must meet all applicable State and local fire and building codes, electrical codes, plumbing codes, mechanical (HVAC) codes, and energy codes. The State codes in effect for this Manual are listed in Appendix 2. Shelters rehabilitated with ESG funds must be used as a homeless shelter for a minimum of 10 years, and this minimum period of use must be enforced by a recorded deed or use restriction.

4.1.1.12.3 Conversion

Conversion is a change in the use of a building to an emergency shelter for persons experiencing homelessness, where the total cost of the conversion exceeds 75 percent of the value of the building after conversion, in accordance with 24 CFR 576.102(c)(1)(ii). For purposes of this determination, the value of the building means the monetary value of the structure after conversion, as determined by an independent real estate appraiser or reasonably established by the recipient (State), ADFA, or its subrecipient .Any emergency shelter converted with ESG funds must be operated and maintained as a homeless shelter for a minimum period of ten (10) years following completion of the conversion. This minimum period of use must be enforced through a recorded deed restriction, covenant, or other legally binding use restriction that ensures compliance for the full required term.

4.1.2 Shelter Operations

If they have been included in an approved budget, the following shelter operations are eligible for reimbursement under ESG's Emergency Shelter component:

- Maintenance
- Rent
- Security
- Fuel
- Insurance
- Utilities
- Food
- Furnishings
- Equipment
- Supplies
- Hotel/Motel Vouchers

Eligible shelter operations costs must be necessary for the continued operation of the shelter. Subrecipients should consult with ADFA before incurring expenses that do not clearly meet that criterion.

4.1.2.1 Maintenance

Emergency shelter maintenance is the cost associated with minor or routine repairs under $1,000.00. It may also be used to pay insurance deductibles under $1,000.00 for repairs covered by insurance.

Reimbursement for shelter maintenance requires the following documentation:

- Documentation of costs and associated payments.

On-site files must also include:

- A narrative explaining the maintenance performed.

4.1.2.2 Rent

Emergency shelter rent is the cost of renting a facility for use as an emergency shelter. It does not include the cost of renting storage space or equipment.

Reimbursement for shelter rent requires the following documentation:

- Payment documentation.

On-site files must also include:

- A lease in the name of the subrecipient.

4.1.2.3 Security

Shelter security includes the cost of security systems and monthly monitored system fees, smoke alarms and monthly monitored system fees, and basic security equipment such as locks, deadbolts, and video surveillance equipment.

Reimbursement for shelter security costs requires documentation of the costs and associated payments.

4.1.2.4 Fuel

Shelter fuel includes winter heating fuel such as propane, oil, or wood.

4.1.2.5 Insurance

Shelter insurance is the monthly premium for liability insurance, property insurance, auto insurance for vehicles owned by the shelter and used solely for shelter business, and fidelity bonding for board directors and officers.

Monthly premiums, quarterly payments, and annual payments are all eligible for reimbursement as long as the period of coverage does not extend outside of the sub-grant performance period. If the insurance coverage period does extend outside of the subgrant's performance period, subrecipients may invoice for reimbursement of the premium for the coverage within the performance period on a pro rata basis.

Reimbursement for a shelter insurance cost requires:

- Documentation of the premium and associated payment.

On-site files must include:

- A certificate of coverage showing the shelter address, the vehicle(s) covered, or the positions bonded.

4.1.2.6 Utilities

Eligible utility costs include monthly water, electricity, natural gas, trash disposal, pest control and

telecom utilities associated with phone service, wireless service, internet access, and the delivery of television programming. These costs should be submitted by the subrecipient on a monthly basis as Emergency Shelter Operating and Maintenance expenses.

Ineligible costs under utilities include late fees and reconnection charges.

Reimbursement for shelter utilities requires:

- Utility bill showing the shelter address as the service address, and
- Documentation of the associated payment.

4.1.2.7 Food

Food for emergency shelters include any food intended for human consumption that is served to shelter residents within the shelter.

Ineligible expenses include meals purchased and served to shelter residents outside the shelter, food served to low-income area residents who are not shelter residents, and food for pets.

Reimbursement for shelter food requires documentation of the cost and associated payment. The cost documentation must show the items purchased.

4.1.2.8 Furnishings

Eligible shelter furnishings include non-disposable items needed to make the shelter fit to live in. The following list of eligible furnishings is a guide only. It is not exclusive; additional items may be eligible.

- Reasonable clothing and shoes for shelter residents;
- Beds, mattresses, box springs, pillows, sheets, blankets, alarm clocks, clothing storage units;
- Towels and washcloths, shower curtains and floor rugs;
- Tables and chairs, pots and pans, dishes, glasses, cutlery and small kitchen appliances;
- Curtains and window blinds;
- Couches and living room seating;
- When placed in a common area for use by all shelter residents, a television would be eligible;
- When placed in a common area for use by all shelter residents, a computer, computer peripherals, and computer desk would be eligible items;
- For shelters that accept families with children and have indoor or outdoor play areas, reasonable toys and play sets are eligible furnishings.

Reimbursement for shelter furnishings requires the following documentation, which must be included in site files and uploaded to HMIS when applicable:

- Brief narrative of the need; and
- Documentation of the cost and associated payment.

4.1.2.9 Equipment

Eligible shelter equipment includes heating and air conditioning equipment, laundry appliances, and large kitchen appliances. The purchase of outdoor lawn equipment is not an eligible expense.

Reimbursement for shelter equipment requires:

- A brief narrative of the need; and
- Documentation of the cost and associated payment.

4.1.2.10 Supplies

Eligible shelter supplies costs include any disposable item that is not food. Cleaning supplies, diapers, toilet paper, and personal hygiene products are examples of shelter supplies.

Reimbursement for shelter supplies requires documentation of the cost and associated payment. The cost documentation must show the items purchased.

4.1.2.11 Hotel/Motel Vouchers

Hotel/motel vouchers are eligible costs only when no appropriate emergency shelter is available for individuals and families experiencing homelessness. Vouchers may be issued for a maximum of 3 nights, with extensions upon approval prior to extending, and may be issued only once per individual or family.

Reimbursement for hotel/motel vouchers requires:

- A brief narrative of the steps taken to find appropriate shelter for the homeless family or individual; and
- Documentation of the cost and associated payment.

On-site files must also include:

- Initial Intake Assessment Form documenting eligibility.

4.1.3 Ineligible under Emergency Shelter

The following activities are ineligible under Emergency Shelter:

- Services performed on the street (those should be offered under Street Outreach);
- Any activities not explicitly detailed in the regulations; and
- Any other ineligible expenses listed above or in ESG regulations/manuals/program notices.

4.2 Rapid Re-Housing

The Rapid Re-Housing component is intended to move Literally Homeless individuals and families out of emergency shelters or off the street into permanent housing by providing housing relocation and stabilization services and rental assistance. The Homelessness Prevention component is intended to assist individuals or families at risk of homelessness with housing stability and prevent them from becoming homeless.

The eligible services and activities lists for Rapid Re-Housing and Homelessness Prevention are identical, but the documentation requirements are slightly different. Unlike Rapid Re-Housing, Homelessness Prevention requires an initial income evaluation for all households, and households must have an income level below 30% of the Area Median Income (AMI) (see HUD Income Limits for ESG) and must demonstrate that they lack sufficient resources or support networks to prevent themselves from becoming homeless without assistance.

The rent for the housing must not exceed the HUD Fair Market Rent (FMR), and it must meet the area standard of rent reasonableness. The Fair Market Rent is a value determined by HUD, and the Fair Market Rent (FMR) values for each Arkansas county are published at https://www.huduser.gov/portal/datasets/fmr.html. It is important to note that FMRs contain utility allowances.

The Rent Reasonableness Standard is determined by each subrecipient through discussions with local realtors and consideration of the location, quality, size, type, and age of local housing stock. Amenities, maintenance, and utilities to be provided by the owner should also be considered. The Rent Reasonableness Standard should be a written document that is included with each Rapid Re-Housing or Homelessness Prevention file. It should state the maximum reasonable rent for 1BR, 2BR, 3BR, and 4BR housing in the area, and it should describe the steps that were taken to arrive at those rents.

If included in the sub-grant budget, eligible activities under Rapid Re-Housing include Rental Assistance (short-term rental assistance, medium-term rental assistance, and/or assistance with rent in arrears), Housing Relocation and Stabilization Financial Assistance (application fees, moving costs, security deposits, last month rents, utility deposits and utility payments), and Housing Relocation and Stabilization Services (housing search and placement costs, case management, mediation, credit repair and legal services).

Reimbursement for Rental Assistance (short-term rental assistance, medium-term rental assistance, and/or assistance with rent in arrears) requires:

- Documentation of compliance with the HUD Fair Market Rent Standard (submission required only for the initial month of assistance);
- Documentation of compliance with the Subrecipient's Rent Reasonableness Standard (submission required only for the initial month of assistance);
- Documentation of compliance with ESG NSPIRE standards for Permanent Housing (submission required only for the initial month of assistance;
- Documentation that lead-based paint notification requirements have been met (submission required only for the initial month of assistance and only for housing constructed prior to 1978);
- A lease between the program participant and the landlord (submission required only for the initial month of assistance);
- A Rental Assistance Agreement between the landlord and the subrecipient (submission required only for the initial month of assistance); and
- Documentation of the cost and associated payment.
- Reimbursement under Homelessness Prevention also includes documentation of compliance with the 30% AMI income limit.

On-site files must also include:

- Initial Intake Assessment Form documenting eligibility; and
- Case notes.

Reimbursement for Housing Relocation and Stabilization Financial Assistance (application fees, moving costs, security deposits, last month rents, utility deposits and utility payments) requires:

- Documentation of compliance with the ESG NSPIRE standards for Permanent Housing (submission required only for the initial month of assistance; use NSPIRE standards starting October 1, 2026);
- Documentation of the cost and associated payment.
- Reimbursement under Homelessness Prevention also includes documentation of compliance with the 30% AMI income limit.

On-site files must also include:

- Initial Intake Assessment Form documenting eligibility; and
- Case notes.

Reimbursement for Housing Relocation and Stabilization Services (housing search and placement costs, case management, mediation, credit repair, and legal services) requires:

- Documentation of compliance with the ESG NSPIRE standards for Permanent Housing (submission required only for the initial month of assistance; use NSPIRE standards starting October 1, 2026); and
- Documentation of the cost and associated payment.
- Reimbursement under Homelessness Prevention also includes documentation of compliance with the 30% AMI income limit.

On-site files must also include:

- Initial Intake Assessment Form documenting eligibility; and
- Case notes.

4.2.1 Rapid Re-Housing Eligibility

Literally Homeless populations and participants who are fleeing domestic violence are eligible for assistance with Rapid Re-Housing. Populations in imminent risk of homelessness, homeless under other federal statutes, fleeing domestic violence, or meeting the definition of "at risk of homelessness" are eligible for assistance with Homelessness Prevention.

4.2.2 Relocation and Stabilization Financial Assistance

Housing Relocation and Stabilization Services are comprised of Financial Assistance and Services. If they have been included in an approved budget, the following housing relocation and stabilization Financial Assistance activities are eligible for reimbursement under the Rapid Re-Housing or Homelessness Prevention components:

- Application Fee
- Security Deposit
- Last Month's Rent
- Utility Deposit
- Utility Payment
- Moving Costs

If they have been included in an approved budget, the following housing relocation and stabilization Service costs are eligible for reimbursement under the Rapid Re-Housing or Homelessness Prevention components:

- Housing Search and Placement
- Housing Stability Case Management
- Mediation
- Legal Services
- Credit Repair

4.2.2.1.1 Application Fees

Application fees are the fees charged by the owner to all applicants seeking housing.

4.2.2.1.2 Security Deposits

Security deposits may not exceed the equivalent of two (2) months' rent.

4.2.2.1.3 Last Month's Rent

If it is necessary to obtain housing for a program participant, ESG funds may be used to pay the last month's rent to the housing owner. The last month's rent must be paid at the time the security deposit and first month's rent are paid and may not exceed one month's rent. If paid, the last month's rent must be included in calculating the program participant's total rental assistance. Total rental assistance cannot exceed 24 months during any 3-year period.

4.2.2.1.4 Utility Deposits

Utility deposits are fees that all customers are required to pay to be connected to gas, electric, water, and sewer services. The fees must be paid in the name of the program participant so that, when refunded or credited to the account, the benefit is to the program participant and not to the subrecipient.

4.2.2.1.5 Utility Payments

Utility payments for gas, electric, water, and sewer may be made for up to 24 months within any 3-year period. These payments may include up to six months of utility payments in arrears per service. Utility payment assistance may only be provided if the service is in the name of the program participant or in the name of a member of the same household and if the lease clearly indicates that the utilities are the tenant's responsibility.

Electricity payments are not available when the Low-Income Home Energy Assistance Program (LIHEAP) Crisis program is open, and gas payments are not available when the regular LIHEAP is in operation.

4.2.2.1.6 Moving Costs

Costs of moving a participant to permanent housing is an eligible expense. These costs can include truck rental, payment to movers, and payment of up to three months of temporary storage fees if the fees are accrued after the date the program participant begins receiving assistance and before the program participant moves into permanent housing. Payment of storage fees in arrears is not eligible.

4.2.2.1.7 Emergency Transfer

If a program participant receiving short- or medium-term rental assistance under 24 CFR 576.106 meets the conditions for an emergency transfer under 24 CFR 5.2005(e), ESG funds may be used to pay amounts owed for breaking a lease to affect an emergency transfer. These costs are not subject to the 24-month limit on rental assistance under 24 CFR 576.106.

4.2.2.1.8 Housing Search and Placement

Housing search and placement under this component encompasses the steps necessary to help program participants locate and obtain suitable permanent housing. This includes assessing the barriers to housing that the participant faces, developing an action plan for locating housing that meets the participant's needs and preferences, negotiating with owners, ensuring that identified housing meets habitability, lead-based paint, and rent reasonableness standards, explaining the lease to the participant, assisting with moving arrangements, and helping the participant get utility services connected.

4.2.2.1.9 Housing Stability Case Management

ESG funds may be used to pay the cost of 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. This assistance is limited to 30 days during the period the program participant is seeking permanent housing and 24 months during the period the program participant is living in permanent housing.

Component services and activities consist of:

- Using the coordinated assessment system to evaluate individuals and families;
- Applying for or receiving Rapid Re-housing assistance;
- Conducting the initial evaluation to verify and document eligibility for individuals and families applying for Rapid Re-housing assistance;
- 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; and
- Conducting re-evaluations

4.2.2.1.10 Mediation

Mediation between the program participant and the owner of the housing, or between the program participant and the person(s) with whom the program participant is living, must be necessary to prevent the program participant from losing the permanent housing in which the program participant currently resides in order to be a reimbursable expense.

4.2.2.1.11 Legal Services

Eligible Legal Services costs are the hourly fees for legal advice and representation by attorneys licensed and in good standing with the Arkansas Bar Association, 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 or that will likely result in the program participant losing the permanent housing in which the program participant currently resides.

ESG funds may be used only to the extent that other appropriate legal services are unavailable or inaccessible within the community. Eligible subject matters are child support, guardianship, paternity, emancipation, and 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, and landlord/tenant matters.

Component services or activities may include:

- Participant 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 also eligible.
- If the grantee is a legal services provider and performs the services itself, the eligible costs are the grantee's employees' salaries and other costs necessary to perform the services.

Ineligible Legal Costs:

- Legal services for immigration and citizenship matters and issues relating to mortgages, retainer fees and contingency fees are ineligible costs.

4.2.3 Rental Assistance

Short-term rental assistance, medium-term rental assistance, and payment of rent in arrears are eligible for reimbursement under the Rapid Re-Housing and Homelessness Prevention components. The assistance may be for any combination of the three types of rental assistance:

- Short-term rental assistance may be provided for up to three months.
- Assistance for more than three months is classified as medium-term rental assistance and may be provided for up to 24 months.
- Payment of rental arrears consists of a one-time payment for up to six months' rent in arrears and may include late fees.

ADFA reserves the right to conduct inspections of units assisted with rental assistance to ensure compliance with all applicable ESG program requirements.

4.2.3.1 Short- and Medium-Term Rental Assistance

The State has the legal authority, under §576.105(5c), to cap the dollar amount of rental assistance that a program participant may receive, to limit the number of months that a program participant may receive rental assistance, or to specify maximum number of times that a program participant may receive rental assistance under the ESG Program. The subrecipient will determine if program participant will share in the cost of rent and guidelines must outline their procedures.

Rent is defined as the sum of the total monthly rent for the unit, any fees required for occupancy under the lease (other than late fees and pet fees) and, if the tenant pays separately for utilities, the monthly allowance for gas, electric, water and sewer as established by the public housing authority for the area in which the housing is located. Late fees are not eligible rental assistance expenses unless they are late fees included under payment of rent in arrears.

This assistance cannot be provided to program participants who are receiving tenant based rental assistance or living in a housing unit receiving project-based rental assistance or operating assistance, from other public monies (i.e. subsidized housing). This assistance cannot be provided if the rent exceeds the Fair Market Rent for the county where the residence is located. Fair Market Rent is a value determined by HUD and published at https://www.huduser.gov/portal/datasets/fmr.html. The rent must also comply with the Rent Reasonableness Standard as determined by the subrecipient through consideration of the location, quality, size, type, and age of the housing, as well as any amenities, maintenance, and utilities to be provided by the owner.

Short-term rental assistance is the payment of rent for eligible program participants for up to three months. Medium-term rental assistance is the payment of rent for eligible program participants for more than three months but less than 24 months. Both forms of assistance are limited to a total of 24 months in any 3-year period, and income reevaluation must take place at least once every year. At the time of re-evaluation, the participant's household income must be less than 30 percent of the HUD-published area median household income (see Appendix) to continue receiving assistance. CoCs and participating entities are required to track this information and need to include these requirements in their respective program policies and procedures.

4.2.3.2 Assistance with Rental Arrears

Assistance with rental arrears consists of a one-time payment of up to six months' rent in arrears. Unlike short- and medium-term rental assistance, rental arrears may include late fees and may be provided to program participants who receive tenant-based rental assistance paid for with public monies or live in housing that receives project-based rental assistance or operating assistance from public monies.

As authorized under the provisions of under §576.105(5c), ADFA has imposed an additional restriction in service on this activity. Rental arrears may not be paid for program participants more than one time in any five-year period.

4.2.4 Ineligible under Rapid Re-Housing

The following activities are ineligible under Rapid Re-Housing:

- Services to program participants who are not Literally Homeless under HUDs definition;
- Motel/Hotel Vouchers;
- Travel costs, car repair or transportation costs for Participants;
- Medical or dental care and medicines;
- Clothing, grooming, or pet care;
- Home furnishings;
- Work or education related materials;
- Payment of temporary storage fees in arrears;
- Any activities not explicitly detailed in the regulations; and
- Any other ineligible expenses listed above or in ESG regulations/manuals/program notices.

4.3 Street Outreach

The Street Outreach component of ESG is intended to facilitate trusting relationships between unsheltered homeless people and subrecipients who provide services for individuals and families experiencing homelessness. A key criterion for this component is *unsheltered* homeless. Individuals and families assisted through Street Outreach must be living on the streets or in places not intended for human habitation and be unwilling or unable to access services in an emergency shelter. Participants must be Literally Homeless because they spend nights in a public or private place not meant for human habitation and are unwilling or unable to enter an emergency shelter or fleeing/attempting to flee domestic violence to be assisted under ESG's Street Outreach component.

4.3.1 Essential Services under Street Outreach

If they have been included in an approved budget, engagement, case management, emergency medical services, emergency mental health services and transportation services to unsheltered homeless people on the street are eligible for reimbursement under the Street Outreach component.

4.3.1.1 Engagement

Engagement is an activity designed to locate, identify, and build relationships with unsheltered homeless people for the purpose of providing immediate support, intervention, and connections with homeless assistance programs. The engagement must take place in the street as opposed to a facility or office. Reimbursement for engagement activities requires documentation of costs and associated payments.

4.3.1.2 Case Management

Case management under the Street Outreach component means the assessment of the housing and service needs of unsheltered homeless persons, and the arrangement for, coordination of, and monitoring of delivery of services to those persons. It must be provided in the street as opposed to a permanent fixed location.

Reimbursement for case management under the Street Outreach component requires the following documentation:

1. Timesheets for the person(s) performing the case management; and
2. Payroll documents for the person(s) performing the case management.

On-site files must also include:

1. Case notes
2. Documentation of unsheltered homeless status
3. Documentation that the service was provided in the street

4.3.1.3 Emergency Medical Services

Emergency Medical Services are the direct outpatient treatment of medical conditions by licensed professionals in community-based settings where unsheltered homeless people are living.

Reimbursement for emergency medical services under the Street Outreach component requires the following documentation:

1. Documentation of costs and associated payments.

On-site files must also include:

1. Documentation of unsheltered homeless status
2. Documentation that the service was provided in the street

4.3.1.4 Emergency Mental Health Services

Emergency mental health services are direct outpatient treatment of mental health conditions by licensed professionals in community-based settings where unsheltered individuals or families experiencing homelessness are living.

Reimbursement for emergency mental health services under Street Outreach requires the following documentation:

1. Documentation of costs and associated payments.

On-site files must also include:

1. Documentation of unsheltered homeless status
2. Documentation that the service was provided in the street

4.3.1.5 Transportation Services

Transportation is travel services provided during the provision of eligible services and the costs of transporting unsheltered individuals and families experiencing homelessness to emergency shelters or other service facilities.

Reimbursement for emergency mental health services under Street Outreach requires the following documentation:

1. Documentation of costs and associated payments.

On-site files must also include:

1. Documentation of unsheltered homeless status

2. Documentation the expenses were incurred during the provision of eligible services; and
3. Documentation the service was provided in the street.

4.3.1.6 Services for Special Populations

Services for Special Populations are any of the essential services listed above that have been tailored to address the special needs of homeless youth, victims of domestic violence and related crimes/threats, and/or people living with HIV/AIDS who are Literally Homeless.

Reimbursement for services for special populations under the Street Outreach component requires all documentation associated with the base service with additional narrative explaining how the service has been tailored to the specific needs of the special population.

4.3.2 Ineligible under Street Outreach

The following activities are ineligible under Street Outreach:

- Services performed in a building or not on the street,
- Motel/Hotel Vouchers,
- Any activities not explicitly detailed in the regulations, and

Any other ineligible expenses listed above or in ESG regulations/manuals/program

- notices.

4.4 Homelessness Prevention

ESG funds may be used to provide 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 another place. This assistance may be provided to individuals and families that meet the following definitions under 24 CFR 576.2 - Definitions:

- Paragraph (1) of the “homeless” definition
- Paragraph (1), (2), and (3) of the “at risk of homelessness” definition, OR
- who meet the criteria in paragraph (2), (3), or (4) of the “homeless” definition in § 576.2 AND have an annual income below 30 percent of median family income for the area, as determined by HUD.

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.

Short-term rental assistance, medium-term rental assistance, and payment of rent in arrears are eligible for reimbursement under the Homelessness Prevention component. The assistance may be for any combination of the three types of rental assistance:

- Short-term rental assistance may be provided for up to three months.
- Assistance for more than three months is classified as medium-term rental assistance and may be provided for up to 24 months.
- Payment of rental arrears consists of a one-time payment for up to six months’ rent in arrears and may include late fees.

Please see the Rental Assistance section for more information.

ESG regulations are very specific about the income threshold for assistance with Homelessness Prevention funds. Income limits from other HUD programs – for example the "Extremely Low-Income limits for families" found in the HUD Section 8 program – cannot be used.

Clarification on this issue was published in the HUD ESG Income Limits resource in March of 2016. See https://www.huduser.gov/portal/datasets/il.html for more information on the HUD Income Limits for the ESG program.

4.4.1 Ineligible under Homelessness Prevention

The following activities are ineligible under Homelessness Prevention:

- Services to program participants who are not at imminent risk or at risk of homelessness under HUDs definition;
- Motel/Hotel Vouchers;
- Travel costs, Car repair or transportation costs for Participants;
- Medical or dental care and medicines;
- Clothing, grooming, or pet care;
- Home furnishings;
- Work or education related materials;
- Payment of temporary storage fees in arrears;
- Any activities not explicitly detailed in the regulations;
- Any other ineligible expenses listed above or in ESG regulations/manuals/program notices.

4.5 Homeless Management Information System (HMIS)

Awardees are required to utilize HMIS or a comparable database for victim service providers. Domestic Violence Providers are required to use the compatible reporting system in which to report aggregate data for the clients they serve with ESG funding. The HMIS component is intended to help ESG subrecipients defray certain costs associated with contributing data to the HMIS or data collection system. No more than five percent (5%) of a subrecipient's award may be used for HMIS costs.

If the subrecipient is a Victim Services Provider or Legal Services Provider, ESG funds may be used to establish and operate a comparable database that collects Participant-level data over time and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must not be entered directly into or provided to an HMIS. See the following section for more information on HMIS or comparable database for Victim Services Providers.

Restrictions: Activities funded under this section must comply with HUD's standards on participation, data collection, and reporting under HMIS. (Reference Bulletin 1)

Reimbursement for HMIS requires:

- Documentation of costs and associated payments.
- Submission of monthly and quarterly reports for the reimbursement period.

4.5.1 HMIS or Comparable Database for Victims of Domestic Violence

Providers of victims of domestic violence are required to cooperate with the CoC and ADFA regarding data reporting changes and updates. Please see Section 20) for information on Protections for Victims of Domestic Violence.

Providers should implement protocols for the collection of domestic violence information to protect Participant privacy and safety. Examples of such protocols may include:

- Discussing or asking questions of participants in private locations away from the abuser;
- Delaying entry of participant data for Participants with a recent history of domestic violence; or
- Choosing not to disclose data about Participants with a history of domestic violence to other homeless projects

Providers should consult with staff experienced in providing trauma-informed care, safety, or other population-specific considerations.

If a participant is providing inconsistent information, clarification should be facilitated by other staff members. Staff should provide participants with the HEARTH ACT definition of domestic violence as:

> *"When a person is experiencing trauma or lack of safety related to, or fleeing to attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual's or family's current housing situation, including where the health and safety of children are jeopardized."*

The definition also includes people who have no safe residence and lack the resources to obtain other safe permanent housing. There are situations where the act of fleeing takes place weeks or months after a particular violent episode, but the conditions within the home remain dangerous. With this clarification, the staff and Participant together can determine the best response for "When experience occurred."

For additional information on required data elements to meet participation and reporting requirements established by HUD and other federal partners, see: FY 2026 HMIS Data Standards Manual.

Restrictions: Activities funded under this section must comply with HUD's standards on participation, data collection, and reporting under HMIS.

Reimbursement for HMIS requires:

- Documentation of costs and associated payments.
- Submission of monthly and quarterly reports for the reimbursement period.

4.5.2 Ineligible under Homeless Management Information System (HMIS)

The following activities are ineligible under HMIS:

- Any activities not explicitly detailed in the regulations
- Any other ineligible expenses listed above or in ESG regulations/manuals/program notices.

4.6 Administration

The Administration component is intended to help ESG subrecipients defray certain Program Administration Costs (PACs) incurred as a result of ADFA requirements.

ESG Funds may be used to pay administrative costs associated with planning and execution of ESG activities. Administrative costs eligible for ESG Funds include program management, coordination, monitoring, and evaluation. ESG Funds for eligible administrative costs may not exceed one percent (1%) of the subrecipient's award. ESG Funds incurred for administrative costs must adhere to the requirements outlined in 24 CFR 576.108(1).

The administrative funds may be used for travel to attend a mandatory training workshop or other approved ESG-related training. These funds may also be used to purchase general office supplies and

equipment such as copy paper, ink cartridges, computer software, computers and printers. Also included are office furniture such as desks, chairs, and file cabinets. These expenses must be for use in the ESG program.

Reimbursement for administrative expenses requires:

- Documentation of costs and associated payments.

4.6.1 Ineligible under Administration

The following activities are ineligible under Administration:

- Any activities not explicitly detailed in the regulations
- Any other ineligible expenses listed above or in ESG regulations/manuals/program notices.

5 Application Process

ESG sub-grants are available on an annual basis, subject to funding availability. ADFA will announce application periods according to federal and state Public Notification requirements.

The application includes an applicant information form, project information form, budget sheets, match information, other standard forms, and narrative portions to support the budget and activities being applied for. The full application is posted on ADFA's website: https://adfa.arkansas.gov/. For questions about the application process, please contact ArkansasESG@horne.com.

5.1 ESG Programs Portal

ESG Applications must be submitted through the ADFA Programs Portal. New applicants must have an ADFA approved provider number to access the ADFA Programs Portal. ADFA encourages new applicants to request a provider number by clicking on the link below. Applicants who already have a provider number and intend to submit an ESG application under the same entity will utilize the same number and will not require a new provider number.

ESG Program Provider Setup Form

For more information about the application submission process through the ADFA Programs Portal, please contact:

Nicholas Sherwood
Phone: 501-682-1228
Email: Nicholas.sherwood@arkansas.gov

Alisa Green
Phone: 501-682-5929
Email: alisa.green@arkansas.gov

5.2 Training Workshop

Prior to the start of the performance period, ADFA may hold a training workshop to discuss subrecipient requirements of the ESG program.

5.3 Application Screening

All correctly completed applications submitted by eligible applicants in accordance with the published requirements for the applicable grant cycle will be screened against application criteria.

Applications will be reviewed for financial good standing, adherence to 2 CFR 200.302 for financial management, and past performance with ADFA, state, and federal programs.

5.4 Scoring Criteria

Applications scoring will involve review of application documentation and completeness, budget, geographic need, capacity, and CoC Participation. For detailed scoring criteria, refer to the current program year's application available in the ADFA portal and/or the current Notice of Funding Availability (NOFA) posted on ADFA's website: https://adfa.arkansas.gov/.

5.5 Application Evaluation

Applications including all required forms, narratives, budgets, etc. will be evaluated according to the ESG program requirements listed in this Manual. Program staff will make recommendations to the ADFA Housing Review Committee. Final approval will be given by the ADFA Board Committee. Considerations will be made according to the applicant's project activities, the regional needs in the service area of the CoC, and availability of funding.

5.6 Performance Period

Unless otherwise stated in the subrecipient agreement, the performance period begins the date of ADFA's agreement with HUD, unless otherwise stated in the subrecipient agreement or upon changes made by ADFA. Subrecipients of ESG funds must provide services for eligible program participants during the period in which ESG funds are provided. Upon changes in occupancy or services provided during the performance period, the subrecipient must notify ADFA within 30 days of the change. For the purposes of matching contributions, only services and costs incurred during the grant's established performance period, defined as the start and end dates of ADFA's agreement with HUD, may be counted toward ESG match, as stated in 24 CFR 576.201(c) and 576.500(o).

6 Award

ESG sub-grants require signature by a representative of ADFA and the Executive Director of the subrecipient to become fully executed. When fully executed, the sub-grant awards are effective as of the date indicated with ADFA's signature. Funds are available for use:

- After a budget has been approved by ADFA;
- After the sub-grant award agreement has been fully executed;
- After the start of the sub-grant's performance period; and
- After the Environmental Review referenced in Section 8 has been completed.

Expenses incurred prior to the completion of any of the above four milestones will not be reimbursed and may result in cancellation of the sub-grant, unless approved in writing by ADFA.

7 Tracking Homelessness or Risk

Subrecipients must enter data on all persons served and all activities assisted under ESG into HMIS or, in the case of victim service providers, a comparable database in accordance with HUD's standards on participation, data collection, and reporting under a local HMIS.

Comparable systems must be able to export data suitable for Consolidated Annual Performance and Evaluation Report (CAPER) submission through the ESG-CAPER Annual Reporting Tool (eCart).

The CAPER is required to be uploaded as a CSV file to SAGE annually. This is a requirement if you have expended funding at any point during the fiscal year: July 1 to June 30. (See Bulletin 10 and 16).

7.1 Documenting Homelessness or Risk

The following sections outline each definition of homelessness as it pertains to the ESG program and how to document a program participant under each definition.

7.1.1 Literally Homeless

In accordance with 24 CFR 576.2, Literally Homeless individuals or families lack a fixed, regular, and adequate nighttime residence. Participants who spend nights in a public or private place not meant for human habitation, such as a car, a laundromat, a parking garage or a wooded area, are Literally Homeless. Anyone living in an emergency shelter, transitional housing, or a hotel or motel paid for by a charitable organization or by a government program is Literally Homeless. Any individual exiting an institution after 90 days or less who was Literally Homeless prior to entering the institution is also classified as Literally Homeless.

Documenting a program participant as Literally Homeless requires:

- Written observation of an outreach worker,
- A written referral from another service provider, or
- Certification by the individual or head of household seeking assistance.

* In addition to written observation, referral or self-certification, individuals exiting an institution must also be documented by discharge paperwork from the institution or a written or oral referral from the institution. If these additional documents cannot be obtained, self-certification and a written record of the case worker's due diligence are required.

Literally Homeless populations are eligible for assistance only through the following ESG components:

- Street Outreach;
- Emergency Shelter; or
- Rapid Re-Housing.

7.1.2 Imminent Risk of Homelessness

Individuals or families who will lose their primary nighttime residence within 14 days of their application for assistance, who have no place to move into after losing that primary nighttime residence, and who lack the resources or support networks needed to obtain other permanent housing, are considered to be at Imminent Risk of Homelessness. Documenting program participant as being in imminent risk of homelessness requires:

1. An eviction notice or a documented and verified statement from the program participant; and
2. Certification from the program participant that they have no place to go if evicted and they lack the financial resources and support networks necessary to obtain permanent housing.

Populations at imminent risk of homelessness may be eligible for assistance through the following ESG components:

- Emergency Shelter; or
- Homelessness Prevention components.

7.1.3 Homeless under Other Federal Statutes

Populations who are defined as Homeless under Other Federal Statutes may be eligible for assistance through the following ESG components:

- Emergency Shelter or
- Homelessness Prevention.

In order to use this definition, however, the subrecipient's Continuum of Care must seek HUD approval. *Please check with ADFA before attempting to use this definition.*

7.1.4 Fleeing, or Attempting to Flee, Domestic Violence

Individuals or families who are Fleeing, or Attempting to Flee, Domestic Violence are eligible for assistance as long as they have no other residence and lack the resources or support networks to obtain other permanent housing.

Documentation requirements differ slightly between victim services providers and non-victim services providers:

- Victim services providers: must document the program participant is fleeing with no subsequent residence and lacks resources. These statements must be certified by either the participant or the victim service provider.
- Non-victim services providers: must document the program participant is fleeing with no subsequent residence and lacks resources AND, where the safety of the participant is not jeopardized, verify the participant's statements.

Participants in this population may be eligible for assistance through the following ESG components:

- Street Outreach;
- Emergency Shelter;
- Rapid Re-Housing; or
- Homelessness Prevention.

Note that eligibility differs for populations who have fled domestic violence and are living in a shelter or on the street and populations who are attempting to flee domestic violence and are not in a shelter or on the street. Please refer to the table in Section 4: Participant Eligibility by Prior Residence.

7.1.5 At Risk of Homelessness

For individuals and families who do not meet the definition of "homeless" under any of the categories established in the Homeless Definition final rule, the McKinney-Vento Act was amended to allow homeless prevention assistance to be provided to persons who are At Risk of Homelessness.

These individual or families must:

1. Have an annual income below 30% AMI
2. must not have sufficient resources or support networks to prevent them from moving to an emergency shelter.

Additionally, they must meet at least one of the following conditions:

(A) Has moved because of economic reasons two (2) or more times during the 60 days immediately preceding the application for assistance;
(B) Is living in the home of another because of economic hardship;
(C) Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days of the date of application for assistance;
(D) Lives in a hotel or motel and the cost is not paid for by charitable organizations or by federal, state, or local government programs for low-income individuals;
(E) Lives in a single room occupancy (SRO) or efficiency apartment unit in which there reside more than 2 persons, or lives in a larger housing unit in which there reside more than one and a half persons per room;
(F) Is exiting a publicly funded institution or system of care;
(G) Otherwise, lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the State's approved Consolidated Plan.

Documentation requirements for this definition include:

1. Verified household incomes with comparison to the appropriate income threshold for the participant's county; and
2. Documentation of one item from (A) through (G) above.

8 Environmental Review

ESG subrecipients may not expend any funds, regardless of source, on any project funded in whole or in part with an ESG sub-grant until the environmental review for the activities associated with ESG sub-grant has been completed. Failure to comply with this requirement may result in cancellation of the sub-grant.

The environmental review is an examination of the potential environmental impacts of a project to ensure compliance with the National Environmental Policy Act (NEPA) and all related laws and authorities. ESG sub-grant funds originate with HUD, and all HUD-assisted projects are required to undergo an environmental review to evaluate potential environmental impacts in how the project may affect the environment and how the environment may affect the project, site, and end users.

HUD, in the regulations found at 24 CFR 58, gives ESG grant recipients the authority to perform the environmental review and assume legal responsibilities for compliance with NEPA. As the HUD grantee, ADFA confirms environmental reviews for all ESG sub-grants and assumes legal responsibility for NEPA compliance.

Each subrecipient must supply all available, relevant information necessary for ADFA to perform for each property any environmental review required by 24 CFR Part 58 and must carry out mitigating measures required or select alternate eligible property, if deemed necessary.

9 Invoices and Reimbursement

Grant funds are provided on a reimbursement basis. Funds must be spent on eligible activities for eligible program participants in accordance with Federal regulations and the policies in this manual.

9.1 Invoice Frequency

Monthly submission of an invoice is a mandatory requirement of the ESG sub-grant. If no reimbursement is requested for a month; an email notification must be submitted to arkansasesg@horne.com. This practice facilitates invoice tracking by ADFA and helps to flag invoices that are not delivered or not processed. Failure to submit a monthly invoice is considered noncompliance and will result in sanctions as specified in Section 11.1.

Unless otherwise agreed upon between the subrecipient and ADFA, invoices are due by close of business the 10th day of the month following the monthly billing period noted on the invoice and must be submitted on approved ADFA forms. Invoices requesting reimbursement must be signed by the Executive Director of the subrecipient and counter-signed by a subrecipient representative who is not authorized to cash checks.

Each invoice package must include the following:

1. Expenditures and Funds Request Form

A completed Expenditures and Funds Request Form signed by the Executive Director or authorized representative of the subrecipient. For client-level rental assistance or financial assistance expenditures, supporting detail must be provided identifying each client expenditure included in the reimbursement request.

The following documents must be submitted with each request:

a. Match Documentation Package

- Match Certification Form
- Match Detail Report or General Ledger, if applicable
- Match Calculation Worksheets
- Supporting Source Documentation
- Any additional information requested during review

b. Monthly Progress Report

c. Statistical Information Report

d. Case Management Tracker

2. Supporting Documentation

Documentation supporting all expenditures for which reimbursement is requested, including evidence that costs were incurred, paid, and are eligible under ESG requirements.

3. HMIS or Comparable Database Report

A client report from HMIS or a comparable database used by victim service providers documenting client activity and services associated with the reimbursement request. Reports must include sufficient information to verify client enrollment, funding source, and services provided.

Acceptable forms of documentation vary by service or expense activity and are discussed in detail under the ESG component and eligible services and activities in Section 4 of this manual.

Invoices may include eligible expenses outside the billing period listed on the Expenditures and Funds Request Form, provided that:

1. Expenditures must have occurred within the performance period of the sub-grant;
2. Expenditures must have occurred within 100 calendar days of the invoice submission date (MITAS date).
3. Subrecipients are encouraged to refer to the portal to ensure they are using the most up-to-date version of applicable ESG forms, guidance, and documentation requirement

Naming Convention of Expenditures and Funds Request Form

- ESG_ ExpendituresandFundsRequestForm_MonthYear_Project#
  - Example: ESG_ ExpendituresandFundsRequestForm_JuneYYYY_YYYY

9.1.1 Administrative and HMIS Funding Draw Guidance

If applicable, administrative costs should not exceed 1% of the monthly draw request, and HMIS costs should not exceed 5% of the monthly draw request. This requirement is intended to help maintain compliance with expenditure and drawdown guidelines (Reference Bulletin 2 and 21).

To avoid exceeding these limits, it is recommended that administrative and HMIS costs be requested proportionately with each monthly draw rather than drawn in large upfront amounts. For example, if monthly expenditures total $5,500, no more than $55 (1%) should be requested for administrative costs and no more than $275 (5%) should be requested for HMIS costs within that same draw request.

Alternatively, subrecipients may choose to defer most administrative and HMIS reimbursement requests until the final draw of the grant period. Either approach helps ensure that administrative and HMIS drawdowns remain within the applicable 1% and 5% caps, reducing the risk of payment delays, draw request holds, or potential recapture of funds.

Extension Requests — Limited and Exceptional

Extensions to submit ESG draw requests are **not guaranteed** and are granted **only** on a **limited, case by case** basis. Extension requests will be considered solely under **extenuating circumstances** beyond the subrecipient's reasonable control, such as:

- Documented natural disasters or declared emergencies;
- Verified delays caused by third parties (e.g., utilities, landlords, or vendors) that directly prevent timely invoicing;
- Systemwide disruptions affecting required reporting or financial systems.
- Staffing shortages, internal administrative delays, or failure to plan are **not** considered sufficient justification for an extension.

Request Procedure

To be considered, an extension request must:

1. Be submitted **in writing** prior to the applicable draw submission deadline (7 days prior to submission due date);
2. Clearly identify the specific expenditures for which the extension is requested;
3. Provide a detailed explanation of the extenuating circumstance causing the delay;
4. Include supporting documentation, where applicable; and
5. Specify the additional time requested, which must be reasonable and limited in duration.

Incomplete or untimely requests will not be reviewed.

Review and Determination

All extension requests are subject to review and approval at the sole discretion of the ESG administrator. Approval determinations will consider:

- Program compliance risk;
- Timeliness and completeness of prior draw submissions;
- Impact on grant expenditure benchmarks and closeout timelines; and
- Consistency with HUD ESG requirements and state administrative standards.
- Approval of an extension for one draw period does **not** establish a precedent or guarantee approval of future extension requests.

Conditions of Approval

If an extension is approved:

- The approval will be documented in writing and will specify a firm revised submission deadline;
- No additional extensions will be granted for the same expenditures; and
- Failure to meet the revised deadline will result in permanent disallowance of the affected costs.

Denial and Consequences

If an extension request is denied, or if no request is submitted:

- Expenditures not submitted within the required timeframe will be deemed ineligible for reimbursement;
- Costs must be absorbed by the subrecipient; and
- Repeated late submissions may result in heightened monitoring, temporary draw suspensions, or other corrective actions consistent with ESG compliance policies.

Reservation of Rights

The ESG administrator reserves the right to deny any extension request to protect program integrity, ensure timely expenditure of funds, and maintain compliance with federal and state requirements.

9.2 Award Budget

Subrecipients must plan and forecast effectively to minimize the need for revisions.

Reservation of Rights
The ESG administrator reserves the right to deny any budget revision request to protect program integrity, ensure equitable administration of funds, and maintain compliance with federal and state requirements.

9.2.1 Budget Flexibility

Subrecipients must manage the expenditures within the approved budget component and/or activity and amounts established in the executed grant agreement. Organizations are encouraged to carefully evaluate anticipated program needs during the application and budgeting process to ensure adequate resources are allocated to each budget component and/or activity prior to award. (Reference Bulletin 18) (24 CFR Part 576.)

9.2.2 Budget Revisions

Requests to shift funds between component and/or activity will not be approved unless otherwise authorized through a formal program-wide policy change implemented by the administering agency.

One-time Budget Revision Limitation
Each ESG subrecipient is permitted **no more than one budget revision between ESG components** during the entire funding period.

- The onetime limitation applies **regardless of the dollar amount** or direction of the transfer.
- Once a budget revision between components has been approved and executed, **no additional requests will be considered** for the remainder of the funding period.

Request Submission Requirements
A request to revise the budget between ESG components must:

1. Be submitted in writing to the ESG administrator prior to incurring any costs under the proposed revised budget;
2. Clearly identify the component(s) from which funds will be reduced and the component(s) to which funds will be reallocated;
3. Provide a detailed justification demonstrating:
   - Programmatic necessity;
   - Alignment with ESG program goals and participant needs; and
   - Continued compliance with all ESG eligibility and expenditure requirements;
4. Include an updated budget summary reflecting the proposed revision; and
5. Acknowledge that the request constitutes the **subrecipient's onetime allowable budget revision** between ESG components for the funding period.
   Incomplete or late submissions will not be reviewed.

Review and Approval
All budget revision requests between ESG components are reviewed on a **case-by-case basis** and are

subject to approval at the sole discretion of the ESG administrator. Approval determinations will consider:

- Program performance and expenditure trends;
- Impact on service delivery and grant outcomes;
- Timeliness and compliance history; and
- Availability of funds within the overall ESG award.
- Approval, if granted, will be documented in writing through a formal budget amendment or agreement modification.

Implementation and Reporting

Upon approval:

- The revised budget becomes effective only as of the approval date stated in the written authorization;
- All draw requests and expenditure reports must reflect the revised budget; and
- Subrecipients must maintain documentation supporting the revision for monitoring and audit purposes.
- Please be advised that once approved the budget does not go into effect until the following draw request period.

Denial and Enforcement

If a budget revision request is denied, or if a subrecipient exceeds the onetime revision limit:

- The original approved budget remains in full force and effect;
- Expenditures incurred outside of the approved budget will be deemed ineligible for reimbursement; and
- Noncompliance may result in corrective action, repayment, increased monitoring, or other remedies consistent with ESG policies.

9.3 Documentation Required for Invoicing

In addition to maintaining physical or site-based records, subrecipients are required to upload applicable client-level documentation (such as eligibility forms, leases, and service plans) into HMIS. Each reimbursement request must include a relevant HMIS report covering the billing period. The report should reflect the services or activities tied to the invoice and provide client-level or summary data as appropriate for the ESG component being billed. The following outlines documentation and forms necessary for invoicing broken down for each component of the ESG program. Please note the activities associated with following categories shown below:

- Rental Assistance includes short-term, medium-term, or rent-in-arrears.
- Financial Assistance includes moving costs, application fees, security deposit, last month's rent, utility deposits, and utility payments.
- Services include housing search and placement, mediation, legal services, credit repair, and housing stability case management.

9.3.1 Invoice Documentation for Emergency Shelter

Required invoicing documentation for Emergency Shelter includes:

Emergency Shelter Invoice Documents	
Operations	• Proof of Cost • Proof of Payment
Essential Services	• Proof of Cost • Proof of Payment

Rehab/Renovations	• Pre/Post Construction Checklist • Proof of Cost • Proof of Payment • Contractor Bid • Contractor Insurance • Valid Contractor License • Proof of Ownership

Table 4: Emergency Shelter Invoice Documents

For Renovation/Rehabilitation and Conversion only

A 10% retainage will be deducted from the total construction cost requested for reimbursement and will be released only after construction is complete and all required post-construction documentation has been submitted and reviewed.

9.3.2 Invoice Documentation for Rapid Re-Housing

Required invoicing documentation for Rapid Re-Housing includes:

Rapid Re-Housing Invoice Documents	

Rental Assistance	• Proof of Cost
	• Proof of Payment
	• Participant Eligibility
	• First Invoice only:
	  ○ ESG-FMR – Fair Market Rent (24 CFR 576.106(d))
	  ○ ESG-RR – Rent Reason Standard (24 CFR 576.106(d))
	  ○ ESG-HAB – NSPIRE standards (24 CFR 576.403(c)
	  ○ ESG-LBP – Lead-Based Paint (24 CFR 576.403(a))
	  ○ Lease (24 CFR 576.106(g))
	  ○ ESG-RAA – Rental Assistance Agreement (24 CFR 576.106(e))

Financial Assistance	• Proof of Cost
	• Proof of Payment
	• Participant Eligibility
	• First Invoice only:
	  ○ ESG-HAB – NSPIRE standards (24 CFR 576.403(c)
	  ○ ESG-LBP – Lead-Based Paint (24 CFR 576.403(a))
	  ○ Lease (24 CFR 576.106(g))
	  ○ ESG-RAA – Rental Assistance Agreement (24 CFR 576.106(e))

Services	• Proof of Cost • Proof of Payment • Participant Eligibility

Table 5: Rapid Re-Housing Invoice Documents

9.3.3 Invoice Documentation for Street Outreach

Required invoicing documentation for Street Outreach includes:

Street Outreach Invoice Documents	
Street Outreach	• Proof of Cost • Proof of Payment

Table 6: Street Outreach Invoice Documents

9.3.4 Invoice Documentation for Homeless Prevention

Required invoicing documentation for Homeless Prevention includes:

Rental Assistance	• Proof of Cost • Proof of Payment • Participant Eligibility • First Invoice only: ○ ESG-FMR – Fair Market Rent (24 CFR 576.106(d)) ○ ESG-HAB – NSPIRE standards (24 CFR 576.403(c) (24 CFR 576.403(c)) ○ ESG-LBP – Lead-Based Paint (24 CFR 576.403(a)) ○ Lease (24 CFR 576.106(g)) ○ ESG-RAA – Rental Assistance Agreement (24 CFR 576.106(e)) ○ ESG-IL – Income Limits (24 CFR 576.103) ○ Eviction or Shut-Off Notice
Financial Assistance	• Proof of Cost • Proof of Payment • Participant Eligibility • ESG-HAB – NSPIRE standards (24 CFR 576.403(c)) • ESG-LBP – Lead-Based Paint (24 CFR 576.403(a)) • Lease (24 CFR 576.106(g)) • ESG-RAA – Rental Assistance Agreement (24 CFR 576.106(e)) • ESG-IL Income Limits (24 CFR 576.103)
Services	• Proof of Cost • Proof of Payment • Participant Eligibility • ESG-IL Income Limits (24 CFR 576.103) • Eviction or Shut-Off Notice

Table 7: Rapid Re-Housing Invoice Documents

See Section 19 for the Reimbursement Request and Attestation Statement form.

10 Records

All records must meet the requirements set forth at 24 CFR 576.500. All records pertaining to each fiscal year of the ESG sub-grant must be retained for a minimum of five years after ADFA's closeout with HUD. This closeout date is NOT the date of the subrecipient's closeout with ADFA.

1. 24 CFR 576.500(y) Period of record retention: All records pertaining to each fiscal year of ESG

funds must be retained for the greater 5 years or the period specified below. Copies made by microfilming, photocopying, or similar methods may be substituted for the original records.

2. 24 CFR 576.500(y)(1) Documentation of each program participant's qualification as a family or individual at risk of homelessness or as a homeless family or individual and other program participant records must be retained for 5 years after the expenditure of all funds from the grant under which the program participant was served.

Certain uses of ESG funds require longer record retention periods.

3. 24 CFR 576.500(y)(2) – When ESG funds are used for the renovation of an emergency shelter and the costs charged to ESG exceed 75% of the value of the building before renovation, then the records must be retained until 10 years after the date that ESG funds are first obligated for the renovation.

4. 24 CFR 576.500(y)(3) – When ESG funds are used to convert a building into an emergency shelter and the costs charged to ESG exceed 75% of the value of the building after conversion, then the records must be retained until 10 years after the date that ESG funds are first obligated for the conversion.

ESG recipients and subrecipients must keep records to show compliance with the following:

- Organizational conflict of interest (§ 576.404(a))
- Personal conflict of interest policy or code of conduct (§ 576.404(b))
- Records to support any exceptions to the prohibitions (§ 576.404(b)(3))

Copies made by microfilming, photocopying, or similar methods may be substituted for the original records. Records must be available for review during normal business hours by any authorized representative of HUD, the HUD Office of the Inspector General, the Comptroller General of the United States, or ADFA. These representatives have the right to inspect any ESG records for as long as the records are maintained, even if they are maintained longer than required.

To ensure that records are retained for the required length of time, subrecipients should contact ADFA before destroying any ESG records.

10.1 ESG Subrecipient Standards, and Policies and Procedures

ESG subrecipients are required to have and use certain policies and procedures. Some, like the coordinated entry system, are the same for all agencies. Others, like written standards for providing ESG assistance, are unique to each agency but must contain similar elements. All policies and procedures must adhere to federal, state, and local requirements as well as the requirements at 2 CFR Part 200 and 24 CFR Part 576.

Subrecipients must establish and consistently apply written standards for providing ESG assistance. Standards must be established for each area covered by the subrecipient, including the area over which the services are coordinated and provided to program participants. Subrecipients are required to submit a Program Policies and Procedures Certification Form with their annual funding application to ADFA, certifying that they will maintain updated policies and procedures specific to ESG funding. These policies and procedures must align with the requirements outlined in this document and comply with all applicable Federal, State, and ADFA standards.

Federal regulations require that all agencies assisted with ESG funds must not exclude or deny benefits or assistance to people with disabilities. Emergency shelters and service agencies should therefore seek to ensure that their shelter and/or agency are physically accessible to people with disabilities. Accessibility includes, but is not limited to such things as: entrance ramps, parking with universal logo signage, grab bars around commodes and showers, top of toilet seats between 17-19

inches from the floor, drain lines under lavatory sink either wrapped or insulated, space for wheelchair maneuverability, accessible water fountains, access between floors (elevators, ramps, lifts), and other improvements needed to assure full access to funded facilities/programs, including serving the blind and deaf.

10.2 Coordinated Entry System

Arkansas Continuums of Care (CoC) have developed a coordinated entry system in accordance with requirements established by HUD, and each non-victim services provider ESG subrecipient within the CoC's service area must use that assessment system to ensure consistent screening, assessment and referral of program participants. Victim services providers may choose not to use the CoC's coordinated assessment system.

11 Compliance Monitoring

Compliance with regulatory and programmatic requirements of the ESG sub-grant may be determined through remote and/or on-site monitoring and risk assessments by ADFA. Monitoring will be conducted annually at a minimum but may be conducted more frequently at the discretion of ADFA.

Monitoring will generally be conducted after advance notice and at a date and time convenient to both ADFA and subrecipients but may be conducted without notice and at any normal hour of business operation at the discretion of ADFA.

The U.S. Department of Housing and Urban Development (HUD)'s CPD Monitoring Handbook (6509.2) will be the guide used in monitoring.

11.1 Non-Compliance

Failure to comply with HUD regulations, this Policy and Procedures Manual, HUD and/or ADFA Policy memos/directives, or the terms and conditions of the ESG sub-grant may result in denial of reimbursement requests, demand for repayment, reallocation of portions of funding, termination of the sub-grant, or even referral for fraud investigation. The specific sanctions imposed will depend upon the severity of the non-compliance and the degree of the subrecipient's cooperation with ADFA. Subrecipients will be notified of sanctions electronically via email.

11.2 Repayment

When improper expenditure of ESG funds is found to have occurred, regardless of the cause, a demand for repayment will be made. ADFA will provide details of the repayment mechanism at that time.

If errors in invoice reimbursement result in overpayment, the overpayment may require repayment by check or may be repaid through an offset of future reimbursement requests. ADFA will provide details of overpayment resolution on a case-by-case basis.

11.3 Non-Compliance Appeal

Sanctions imposed under the provisions of Section 11.1 for non-compliance are subject to appeal by ESG subrecipients. Appeals must be made in writing to ADFA within 15 calendar days of the certified delivery date of formal written notice of sanction being imposed. The appeal must provide all documentation that is to be considered in determining facts in dispute and may present extenuating circumstances in lieu of dispute of facts.

Enforcement actions under appeal are stayed while ADFA considers the appeal. ADFA will issue a Final Decision in writing within 30 calendar days after receipt of written appeals. ADFA's final decision on the appeal of any ESG sanction is subject to normal litigation procedures in the appropriate Court of Law.

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12 ESG-HAB: NSPIRE Standards for Emergency Shelter/ Permanent Housing

NSPIRE Standards are described below.

NSPIRE Habitability Standards Transition:

Effective October 1, 2026, ESG Program Habitability Standards will transition to HUD's NSPIRE inspection standards. All subrecipients must ensure compliance with NSPIRE standards. HUD guidance on implementation is available at: HUD Exchange – NSPIRE. (See Bulletin 6)

Policies and procedures throughout this document referencing habitability inspections should be interpreted with this transition in mind.

13 ESG-PE: Participant Eligibility Form

PURPOSE

This form is the Provider's certification to ADFA that the Emergency Solutions Grant (ESG) Program Participant is eligible for the assistance and/or services provided. This form must be completed and submitted with an ESG invoice that requests reimbursement for assistance and/or services provided to the Program Participant.

This form is required only during the initial month of assistance and/or service. A copy of this form, and all documents supporting the information on this form, should be maintained by the Provider in the Program Participant's case file.

DIRECTIONS FOR COMPLETION

- Introduction: The Provider should complete this form. When completed, the Provider should thoroughly review all information before certifying that the information is correct.
- Program Participant's Name and HMIS #: Enter the Program Participant's name and Homeless Management Information System (HMIS) number. Domestic Violence Services Providers (DVSPs) will enter the number assigned by the comparable data system used instead of HMIS. For confidentiality purposes, DVSPs may leave the name blank and enter only the HMIS (or comparable) number.
- Participant is Literally Homeless, meaning: If the Participant is Literally Homeless, check the box corresponding to the applicable definition. If the Participant is NOT Literally Homeless, do not check any of the boxes.
- Participant is at risk of homelessness, meaning: If the Participant is at risk of homelessness, check the box corresponding to the applicable definition. If the Participant is NOT at risk of homelessness, do not check any of the boxes.
- Participant is fleeing, or is attempting to flee, domestic violence, meaning: If the Participant is fleeing, or is attempting to flee, domestic violence, check this box. If the Participant is NOT fleeing, or attempting to flee, domestic violence, do not check this box.
- Please indicate the type of documentation on file: Check the box corresponding to the type of documentation in the Provider's file for this Participant to support this certification.
- Certification: Enter the Provider/caseworker's name, title, and organization. Print, sign and date the form.

ROUTING

This form must be submitted with the first ESG invoice that requests reimbursement for assistance and/or services provided to this Participant. This form is not required when reimbursement is requested for this same Participant in subsequent months. Place a copy of this form in the Participant's file. Alternate formats (large print, audio tape, etc.) will be provided upon request.

The Participant Eligibility Form continues onto the following page.

ESG-PE: ESG PARTICIPANT ELIGIBILITY FORM

Participant Name: _____ HMIS#: _____

Participant is Literally Homeless, according to 24 CFR 576.2, and is eligible for Street Outreach, Emergency Shelter, and Rapid Re-Housing:

Check if applicable	Description
☐	(i). An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
☐	(ii). An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
☐	(iii). An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Participant is an individual or family who is at risk of homelessness, according to the definition at 24 CFR 576.2, and is eligible for Homelessness Prevention:

1. Has an annual income below 30 percent of median family income for the area (as documented on Form ESG-IL);
2. Lacks sufficient, immediately available resources or support networks to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the HUD "homeless" definition in 24 CFR 576.2; and
3. Meets one of the following conditions:

Check if applicable	Description
☐	A. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
☐	B. Is living in the home of another because of economic hardship;
☐	C. Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days of the date of application for assistance;
☐	D. Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, state, or local government programs for low-income individuals;
☐	E. Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there

	reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;
☐	F. Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
☐	G. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan.

Participant is fleeing, or is attempting to flee, domestic violence, according to the definition at 24 CFR 576.2, and is eligible for Shelter, Rapid Re-Housing, and Homelessness Prevention:

Check if applicable	Description
☐	H. Participant Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence; and Has no other residence; and Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

Verifying homeless status is a core provider responsibility, and subrecipients are required to document eligibility at program entry, even for emergency shelters. For Rapid Re-Housing and Homelessness Prevention assistance funded under the ESG Program, the interim rule establishes the following order of priority for obtaining evidence:

1. Third-party documentation, including written and source documentation, and HMIS records;
2. Intake worker observations;
3. Certification from persons seeking assistance.

Please indicate the type of documentation on file (do not submit the additional documentation with the invoice) to support this certification:

Check if applicable	Documentation
☐	Third-party documentation (preferred method)
☐	Provider observation
☐	Participant self-certification (with certification form)

CERTIFICATION

☐ I certify to the best of my knowledge and belief all of the information on this Participant Eligibility Form is true and correct.

Provider: _____

Representative Name: _____ Title: _____

Representative Signature: _____ Date: _____

14 ESG-LBP Lead Paint Risk Assessment

PURPOSE

The ESG-LBP is the Provider's documentation that lead-based paint hazards were assessed by a certified inspector in accordance with 42 U.S.C. 2682(a)(1) and that the Participant was provided with information on the hazards associated with lead-based paint.

This form is required only during the initial month of assistance/services provided to a Participant. A copy of this form, and all documents supporting the information on this form, should be maintained by the Provider in the Program Participant's case file.

COMPLETION

- Introduction: The Provider should complete this form. When completed, the Provider should thoroughly review all information before signing.
- Name of Participant: Enter the Program Participant's name. For confidentiality purposes, DVSPs may leave the name blank and enter only the HMIS (or comparable) number.
- Address: Enter the street address of the unit, unit number, City, State, and Zip Code
- ESG Program Staff: Enter the name of the Provider staff person conducting the assessment.
- Was the leased property constructed before 1978? Select either the "Yes" or "No" box.
- Will a child under the age of six be living in the unit? Select either the "Yes" or "No" box.
    - If the answer to one or both of the questions above was "No,' then enter the Provider/inspector's name.
        - Print, sign and date the form using blue ink.
    - If the answer to both of the questions above was "Yes,' then a visual lead assessment is required.
- Date of visual assessment: Enter the date of the visual assessment.
- Were lead-based paint hazards found? Check the box to indicate whether or not lead-based paint was found in the unit.
- If found, was the participant provided with a copy of the EPA Lead-Based Paint Assessment : Check the box to indicate whether or not the Participant was provided with the EPA Lead-Based Paint bulletin.
- If lead-based paint hazards were found, provide a brief summary of the types and location of the lead-based paint hazards: Briefly describe the types and location of the lead-based paint hazards observed.
- Signatures: The Provider/Inspector and the Program Participant must both sign this form.

ROUTING

This form must be submitted with the first ESG invoice that requests reimbursement for Assistance or Services provided to this Participant. This form is not required when reimbursement is requested for this same Participant in subsequent months. Place a copy of this form in the Participant's file. Alternate formats (large print, audio tape, etc.) will be provided upon request.

ESG-LBP: LEAD-BASED PAINT RISK ASSESSMENT FORM

INSTRUCTIONS

To prevent lead-poisoning in young children, ESG sub-grant recipients must comply with the Lead-Based Paint Poisoning Prevention Act of 1973 and its applicable regulations at 24 CFR 35, Parts A, B, M, and R. Under certain circumstances, a visual assessment of the unit is not required. This form will help ESG subrecipients determine whether a unit is subject to a visual assessment and, if so, how to proceed.

A copy of the completed form with any related documentation should be kept in each program participant's file. Note: ALL pre-1978 properties are subject to the disclosure requirements outlined in 24 CFR 35, Part A, regardless of whether or not they are exempt from the visual assessment requirements.

BASIC INFORMATION

Participant Name: _____ HMIS#: _____

Address: _____

ESG Program Staff Name: _____

Part 1: Is Visual Assessment required?

If the answer to one or both of the following questions is 'no,' a visual assessment is NOT triggered for this unit, and no further action is required at this time. If the answer to both of these questions is 'yes,' then a visual assessment IS triggered for this unit, and Program staff should continue to Part 2.

Yes	No	Question
☐	☐	1. Was the leased property constructed before 1978?
☐	☐	2. Will a child under the age of six (6) be living in the unit occupied by the household receiving ESG assistance?

Part 2: Visual Risk Assessment

For pre-1978 housing with a child aged six (6) or under who has identified Environmental Intervention Blood Lead Level.

Yes	No	Question
☐	☐	1. Were lead-based paint hazards found?
☐	☐	2. If found, was the participant provided with a copy of "Protect Your Family from Lead in Your Home" (Clearinghouse document #055-000-00507-9)?
3. If lead-based paint hazards were found, provide a brief summary of the types and location of the lead-based paint hazards.		

15 ESG-RAA: ESG Rental Assistance Agreement

PURPOSE

This form is the Provider's documentation that the landlord agrees to accept payment from the Provider on behalf of the Participant. This form is required only during the initial month of Rental Assistance provided to a Participant. A copy of this form, and all documents supporting the information on this form, should be maintained by the Provider in the Program Participant's case file.

COMPLETION

- Introduction: The Provider should complete this form. When completed, the Provider and landlord must both sign the form.
- MM/DD/YYYY: Enter the date of the Rental Assistance Agreement in MM/DD/YYYY format.
- Apartment Complex or Landlord: Enter the name of the apartment complex or landlord.
- ESG Subrecipient: Enter the name of the Provider.
- Program Participant: Enter the name of the Participant. For confidentiality purposes, DVSPs may leave the name blank and enter the HMIS (or comparable) number.
- Application Fee: If an Application Fee is being paid to the landlord by the Provider, enter the amount being paid.
- Security Deposit: If a Security Deposit is being paid to the landlord by the Provider, enter the amount being paid.
- Utility Deposit: If a Utility Deposit is being paid to the landlord by the Provider, enter the amount being paid.
- Rent in Arrears: If Rental Assistance is being paid to the landlord by the Provider, enter the amount being paid for Rent in Arrears.
- First Month's Rent: If Rental Assistance is being paid to the landlord by the Provider, enter the amount being paid for the first month's rent.
- Second Month's Rent: If Rental Assistance is being paid to the landlord by the Provider, enter the amount being paid for the second month's rent.
- Third Month's Rent: If Rental Assistance is being paid to the landlord by the Provider, enter the amount being paid for the third month's rent.
- Medium-Term Rental Assistance: If Rental Assistance is being paid to the landlord by the Provider, enter the total amount being paid for all months beyond the third month.
- Last Month's Rent: If Last Month's rent is being paid to the landlord by the Provider, enter the amount being paid.
- Anticipated Total Assistance: Enter the total amount being paid to the landlord by the Provider under the terms of this Rental Assistance Agreement.
- Participant Name(s): Enter the Program Participant's name. For confidentiality purposes, DVSPs may leave the name blank and enter only the HMIS (or comparable) number.
- HMIS #: Enter the Program Participant's Homeless Management Information System (HMIS) number. Domestic Violence Services Providers (DVSP) will enter the number assigned by the comparable data system used instead of HMIS.
- Provider Name: Enter the name of the Provider.
- Mailing Address: Enter the mailing address of the Provider.
- City, State, ZIP: Enter the City, State and ZIP code of the Provider.
- Landlord/Owner Name: Enter the name of the Landlord or Owner.
- Landlord/Owner Mailing Address: Enter the mailing address of the Landlord or Owner.
- Landlord/Owner City, State, ZIP: Enter the City, State and ZIP code of the Landlord or Owner.

ROUTING

This form must be submitted with the first ESG invoice that requests reimbursement for Rental Assistance provided to this Participant. This form is not required when reimbursement is requested for this same Participant in subsequent months. Place a copy of this form in the Participant's file. Alternate formats (large print, audio tape, etc.) will be provided upon request.

RENTAL ASSISTANCE AGREEMENT (1 of 2)

This Rental Assistance Agreement is entered into on (MM/DD/YYYY) by and between (Apartment Complex or Landlord) ("LESSOR") and (ESG Subrecipient) ("PROVIDER").

PROVIDER receives federal funds through the Emergency Solutions Grants (ESG) program to provide tenant-based rental assistance to individuals or families who are Literally Homeless, in imminent risk of homelessness, or fleeing/attempting to flee domestic violence.

Based on each individual program criteria, LESSOR agrees to:

- Provide program participants with a clean, safe housing unit that is well maintained.
- Follow federal Fair Housing regulations
- Follow state residential agreement laws and regulations
- Accept payment in the form of a check drawn upon PROVIDER's account
- Deliver a completed W-9 form to PROVIDER
- If security deposit is made by PROVIDER, then:
    - Upon move, deliver to PROVIDER an accounting of the charges deducted from the security deposit
    - If applicable, return any security deposit funds to the program participant
- Deliver to PROVIDER a copy of any notice to the program participant to vacate the housing unit or any complaint used under state or local law to commence an eviction against the program participant
- Rental assistance payment by PROVIDER (for 1 month's rent) to LESSOR guarantees program participant residency for an additional 30 days.

Depending upon final approval of the program participant into the program, PROVIDER agrees to pay Rental Assistance and/or Housing Relocation and Stabilization Services Financial Assistance directly to LESSOR as per lease agreement made with Program Participant and LESSOR until such time that the Assistance has ended.

RENTAL ASSISTANCE AGREEMENT (2 of 2)

Program Participant Name(s): _____ HMIS#: _____

ANTICIPATED ASSISTANCE

Assistance Description	Amount
Application Fee	
Security Deposit	
Utility Deposit[10]	
Rent in Arrears	
First Month's Rent	
Second Month's Rent	
Third Month's Rent	
Medium-Term Rental Assistance	
Last Month's Rent	
Anticipated Total Assistance	$

By signing below, PROVIDER agrees to make the specified assistance payment(s) on behalf of the Program Participant to LESSOR. By signing below, LESSOR agrees to accept payments from PROVIDER for the Program Participant specified above.

PROVIDER (Provider Name)	LESSOR (Landlord/Owner Name)
PROVIDER (Mailing Address)	LESSOR (Landlord/Owner Mailing Address)
PROVIDER (City, State, ZIP)	LESSOR (Landlord/Owner City, State, ZIP)
PROVIDER (Printed Name and Title of Signatory)	LESSOR (Printed Name and Title of Signatory)
PROVIDER (Signature)	LESSOR (Signature)
(Date)	(Date)

16 ESG-FMR: Fair Market Rent Form

PURPOSE

The ESG-FMR is the Provider's documentation that the Rental Assistance provided to the Program Participant was used for a unit compliant with HUD's Schedule of Metropolitan & Non-Metropolitan Fair Market Rents. This form must be completed and submitted with an ESG invoice that requests reimbursement for Rental Assistance provided to the Program Participant. This form is required only during the initial month of Rental Assistance. A copy of this form, and all documents supporting the information on this form, should be maintained by the Provider in the Program Participant's case file.

COMPLETION

- Introduction: The Provider should complete this form. When completed, the Provider should thoroughly review all information before indicating that the unit complies with the FMR standard.
- Participant Name: Enter the Program Participant's name. For confidentiality purposes, Domestic Violence Services Providers (DVSPs) may leave the name blank and enter only the HMIS (or comparable) number.
- HMIS #: Enter the Program Participant's Homeless Management Information System (HMIS) number. Domestic Violence Services Providers (DVSP) will enter the number assigned by the comparable data system used instead of HMIS.
- Household Size: Enter the total number of persons in the Participant's household.
- Unit # of Bedrooms: Enter the number of bedrooms in the rental unit.
- County, Street Address, City, ZIP: Self-explanatory.
- FMR: Enter the HUD FMR for the selected unit size in the county in which the unit is located.
- Unit Rent + Utility Allowance: Enter the sum of the unit's monthly rent plus the utility allowances (from the local Public Housing Authority) of all utilities for which the Participant is responsible. Do not include utility allowances for utilities provided by the landlord.
- Does this unit comply withHUD Fair Market Rent Indicate whether or not the unit complies with the HUD FMR standard.
- Approved by: The Caseworker should print and sign the form.

ROUTING

This form must be submitted with the first ESG invoice that requests reimbursement for Rental Assistance provided to this Participant. This form is not required when reimbursement is requested for this same Participant in subsequent months. Place a copy of this form in the Participant's file.
Alternate formats (large print, audio tape, etc.) will be provided upon request.

RENT REASONABLENESS AND FAIR MARKET RENT CERTIFICATION (1 of 2)

To verify the rent for the unit is reasonable, compare it to similar units in the complex or neighborhood. "Similar" units must be of the same type and have the same number of bedrooms. The selected unit's rent should not exceed the rent for similar units, but providers may certainly take factors such as accessibility, general condition, and utility expenses into consideration. This or other Rent Reasonableness documentation must be submitted with RRH and HP Rental Assistance invoices.

	Selected Unit	Unit #1	Unit #2	Unit #3
Address of Unit:				
Type of Unit: *(Check only one)*	☐ Apt. 1-4 Floors ☐ Apt. 5+ Floors ☐ Duplex/Townhome ☐ Manufactured ☐ Single Family ☐ Other: _____	☐ Apt. 1-4 Floors ☐ Apt. 5+ Floors ☐ Duplex/Townhome ☐ Manufactured ☐ Single Family ☐ Other: _____	☐ Apt. 1-4 Floors ☐ Apt. 5+ Floors ☐ Duplex/Townhome ☐ Manufactured ☐ Single Family ☐ Other: _____	☐ Apt. 1-4 Floors ☐ Apt. 5+ Floors ☐ Duplex/Townhome ☐ Manufactured ☐ Single Family ☐ Other: _____
Number of Bedrooms:				
Square Footage:				
General Condition:				
Location/ Accessibility: *(Check all that apply)*	☐ Schools ☐ Bus Route ☐ Medical ☐ Library ☐ Park ☐ Other: _____	☐ Schools ☐ Bus Route ☐ Medical ☐ Library ☐ Park ☐ Other: _____	☐ Schools ☐ Bus Route ☐ Medical ☐ Library ☐ Park ☐ Other: _____	☐ Schools ☐ Bus Route ☐ Medical ☐ Library ☐ Park ☐ Other: _____
Amenities: *(Check all that apply)*	☐Air Conditioner ☐Garbage Disposal ☐Dishwasher ☐Washer/Dryer ☐Carpet ☐Rec Facilities. ☐Storage Areas ☐Parking ☐Maintenance Service ☐Housing Services ☐Other: _____	☐Air Conditioner ☐Garbage Disposal ☐Dishwasher ☐Washer/Dryer ☐Carpet ☐Rec Facilities. ☐Storage Areas ☐Parking ☐Maintenance Service ☐Housing Services ☐Other: _____	☐Air Conditioner ☐Garbage Disposal ☐Dishwasher ☐Washer/Dryer ☐Carpet ☐Rec Facilities. ☐Storage Areas ☐Parking ☐Maintenance Service ☐Housing Services ☐Other: _____	☐Air Conditioner ☐Garbage Disposal ☐Dishwasher ☐Washer/Dryer ☐Carpet ☐Rec Facilities. ☐Storage Areas ☐Parking ☐Maintenance Service ☐Housing Services ☐Other: _____

(Continued)	Selected Unit	Unit #1	Unit #2	Unit #3
Approximate year built:				
Utilities	☐ Gas ☐Paid ☐ Electric ☐Unpaid ☐ Water ☐ Cable/Internet	☐ Gas ☐Paid ☐ Electric ☐Unpaid ☐ Water ☐ Cable/Internet	☐ Gas ☐Paid ☐ Electric ☐Unpaid ☐ Water ☐ Cable/Internet	☐ Gas ☐Paid ☐ Electric ☐Unpaid ☐ Water ☐ Cable/Internet
Unit Rent + Utility Allowance = Gross Rent	Rent: _____ Utilities: _____ Gross Rent: _____	Rent: _____ Utilities: _____ Gross Rent: _____	Rent: _____ Utilities: _____ Gross Rent: _____	Rent: _____ Utilities: _____ Gross Rent: _____
Handicap Accessible?	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No

FAIR MARKET RENT FORM (ESG-FMR)

Fill out the form below by using HUD's Schedule of Metropolitan & Non-Metropolitan Fair Market Rents as a guide.

The FMRs for unit sizes larger than four bedrooms are calculated by adding 15 percent to the four-bedroom FMR, for each extra bedroom. For example, the FMR for a five-bedroom unit is 1.15 times the four-bedroom FMR, and the FMR for a six-bedroom unit is 1.30 times the four-bedroom FMR. FMRs for single-room occupancy units are 0.75 times the zero-bedroom (efficiency) FMR.

Participant Name: _____ HMIS#: _____

Household Size: _____ # Bedrooms: _____

Street Address: _____ Apartment#: _____

City, State, Zip:

_____

County: _____

Fair Market Rent: _____ Applicable FMR: _____
(Attach FMR Chart)

Does this unit comply with the HUD Fair Market Rent (FMR) Standard? Yes ☐ No ☐

Based upon a comparison with rents for comparable units, I have determined that the proposed rent for the unit is reasonable and in compliance with 24 CFR 576.106(d): Yes ☐ No ☐

☐ I certify to the best of my knowledge and belief all of the information on this Fair Market Form (ESG-FMR) form is true and correct.

Approver: _____ _____
Agency Representative Name Title

_____ _____
Agency Representative Signature Date

17 ESG-IL: Income Limits Form

In accordance with 24 CFR 576.401(c), when determining the annual income of an individual or family, the subrecipient must use the standard for calculating annual income under 24 CFR 5.609.

Income limits are posted on HUD's website:
https://www.huduser.gov/portal/datasets/il.html#year2026

PURPOSE

This form is the Provider's documentation for invoicing purposes that the Participant's household income did not exceed HUD's ESG income limits at the time assistance or services were provided. This form must be completed and submitted with an ESG invoice that requests reimbursement for Homelessness Prevention assistance or services provided to the Program Participant. A copy of this form, and all documents supporting the information on this form, should be maintained by the Provider in the Program Participant's case file.

COMPLETION

- Introduction: The Provider should complete this form. When completed, the Provider should thoroughly review all information before indicating that the Participant's household does not exceed the applicable ESG income threshold.
- Participant Name: Enter the Program Participant's name. For confidentiality purposes, Domestic Violence Services Providers (DVSPs) may leave the name blank and enter only the HMIS (or comparable) number.
- HMIS #: Enter the Program Participant's Homeless Management Information System (HMIS) number. Domestic Violence Services Providers (DVSP) will enter the number assigned by the comparable data system used instead of HMIS.
- County Name: Enter the Name of the county in which the unit is located. Delete all counties from this form that are not in the Provider's service area. This form should be a one-page form.
- Household Size: Enter the total number of persons in the Participant's household.
- Household Income: Enter the total household income for all persons in the Participant's household. In April of 2016, HUD's CPD Income Eligibility Calculator was expanded to include ESG. To correctly calculate the Participant's household income, go to the CPD Income Eligibility Calculator page at https://www.hudexchange.info/incomecalculator/ and follow the instructions.
- ESG Income Threshold: Enter the Income Limit for the correct household size in the county in which the household is located.
- Does this Participant / Household qualify for assistance …: Indicate whether the household qualifies for assistance under the ESG Homelessness Prevention component.
- Approved by: The Caseworker should print and sign the form.

ROUTING

This form must be submitted with the first ESG invoice that requests reimbursement for Homelessness Prevention assistance or services provided to this Participant. This form is not required when reimbursement is requested for this same Participant in subsequent months. Place a copy of this form in the Participant's file. Alternate formats (large print, audio tape, etc.) will be provided upon request.

ESG-IL ESG INCOME LIMITS FORM

HMIS#: _____ County: _____

Participant Name: _____ _____
First Last

Household Income: _____ Household Size: _____

Using the link provided below, determine the income threshold for the Participant Household size and include that number next to "ESG Income Threshold."

HUD Income Limits: https://www.huduser.gov/portal/datasets/il.html

ESG Income Threshold: _____

Does this Participant / Household Qualify for ESG? ☐ Yes ☐ No

☐ I certify to the best of my knowledge and belief all of the information on this Income Limits (ESG-IL) form is true and correct.

Approver: _____ _____
Agency Representative Name Title

_____ _____
Agency Representative Signature Date

18 ESG Reimbursement Request Attestation Form

By signing this form, I acknowledge my agency has not requested, received, nor will receive in the future any reimbursement from any other sources for expenses that are being submitted for Emergency Solutions Grant (ESG) funding request.

I understand that, if found in violation of the terms and conditions of the ESG Reimbursement Request, it may result in demand for repayment, termination of the sub-grant, or even referral for investigation of fraud.

The terms of this acknowledgment are for the duration of the ESG Grant outlined in the subrecipient agreement with ADFA.

Subrecipient Name: _____

Subrecipient Phone: _____

Subrecipient Representative Name: _____
Printed Name

Representative Signature: _____ Date: _____

19 Protections for Victims of Domestic Violence

All ESG subrecipients and activities must be in compliance with 24 CFR 576.409.

(a) Applicability of VAWA protections. The core statutory protections of VAWA prohibit denial or termination of assistance or eviction solely because an applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking applied upon enactment of VAWA 2013 on March 7, 2013. The VAWA regulatory requirements under 24 CFR part 5, subpart L, as supplemented by this section, apply to all eligibility and termination decisions that are made with respect to ESG rental assistance on or after *December 16, 2016.* The recipient must ensure that the requirements under 24 CFR part 5, subpart L, are included or incorporated into rental assistance agreements and leases as provided in § 576.106(e) and (g).

(b) Covered housing provider. For the ESG program, "covered housing provider," as such term is used in HUD's regulations in 24 CFR part 5, subpart L, refers to:

(1) The recipient or subrecipient that administers the rental assistance for the purposes of 24 CFR 5.2005(e);
(2) The housing owner for the purposes of 24 CFR 5.2005(d)(1), (d)(3), and (d)(4) and 5.2009(a);
(3) The housing owner and the recipient or subrecipient that administers the rental assistance for the purposes of 24 CFR 5.2005(d)(2); and
(4) The housing owner and the recipient or subrecipient that administers the rental assistance for the purposes of 24 CFR 5.2007. However, the recipient or subrecipient may limit documentation requests under 24 CFR 5.2007 to only the recipient or subrecipient, provided that:

(i) This limitation is made clear in both the notice described under 24 CFR 5.2005(a)(1) and the rental assistance agreement;
(ii) The entity designated to receive documentation requests determines whether the program participant is entitled to protection under VAWA and immediately advise the program participant of the determination; and
(iii) If the program participant is entitled to protection, the entity designated to receive documentation requests must notify the owner in writing that the program participant is entitled to protection under VAWA and work with the owner on the program participant's behalf. Any further sharing or disclosure of the program participant's information will be subject to the requirements in 24 CFR 5.2007.

(c) Notification. As provided under 24 CFR 5.2005(a), each recipient or subrecipient that determines eligibility for or administers ESG rental assistance is responsible for ensuring that the notice and certification form described under 24 CFR 5.2005(a)(1) is provided to each applicant for ESG rental assistance and each program participant receiving ESG rental assistance at each of the following times:

(1) When an individual or family is denied ESG rental assistance;
(2) When an individual or family's application for a unit receiving project-based rental assistance is denied;
(3) When a program participant begins receiving ESG rental assistance;
(4) When a program participant is notified of termination of ESG rental assistance; and

(5) When a program participant receives notification of eviction.

(d) *Emergency transfer plan. (see HUD's example Emergency Transfer Plan)*

(1) The recipient must develop the emergency transfer plan under 24 CFR 5.2005(e) or, if the recipient is a state, require its subrecipients to administer ESG rental assistance to develop the emergency transfer plan(s) required under 24 CFR 5.2005(e). If the state's subrecipients are required to develop the plan(s), the recipient must specify whether an emergency transfer plan is to be developed for:

(i) The state as a whole;
(ii) Each area within the state that is covered by a Continuum of Care; or
(iii) Each subrecipient that administers ESG rental assistance.

(2) Once the applicable plan is developed in accordance with this section, the recipient and each subrecipient that administers ESG rental assistance must implement the plan in accordance with 24 CFR 5.2005(e).

(3) Each emergency transfer plan must meet the requirements in 24 CFR 5.2005(e) and include the following program requirements:

(i) For families living in units receiving project-based rental assistance (assisted units), the required policies must provide that if a program participant qualifies for an emergency transfer, but a safe unit is not immediately available for an internal emergency transfer, that program participant shall have priority over all other applicants for tenant-based rental assistance, utility assistance, and units for which project-based rental assistance is provided.

(ii) For families receiving tenant-based rental assistance, the required policies must specify what will happen with respect to the non-transferring family member(s), if the family separates in order to affect an emergency transfer.

(e) Bifurcation. For the purposes of this part, the following requirements shall apply in place of the requirements at 24 CFR 5.2009(b):

(1) When a family receiving tenant-based rental assistance separates under 24 CFR 5.2009(a), the family's tenant-based rental assistance and utility assistance, if any, shall continue for the family member(s) who are not evicted or removed.

(2) If a family living in a unit receiving project-based rental assistance separates under 24 CFR 5.2009(a), the family member(s) who are not evicted or removed can remain in the assisted unit without interruption to the rental assistance or utility assistance provided for the unit.

(f) Emergency shelters. The following requirements apply to emergency shelters funded under § 576.102:

(1) No individual or family may be denied admission to or removed from the emergency shelter on the basis or as a direct result of the fact that the individual or family is or has been a

victim of domestic violence, dating violence, sexual assault, or stalking, if the individual or family otherwise qualifies for admission or occupancy.

(2) The terms "affiliated individual," "dating violence," "domestic violence," "sexual assault," and "stalking" are defined in 24 CFR 5.2003.

20 Required Standards and Policies and Procedures for ESG Subrecipients

All ESG Programs
All Programs supported by the ESG Subrecipient using ESG funds must include the following in their Standards and Policies and Procedures documents:

1. How are services and referrals coordinated between:
    a. Emergency shelter providers;
    b. Essential services providers;
    c. Homelessness prevention providers;
    d. Rapid rehousing providers;
    e. Homeless service providers;
    f. Other service providers (including mainstream resources); and
    g. Housing providers?
2. What policies exist to ensure the needs of sub-populations are met? (i.e. Youth, victims of domestic violence, chronically homeless, homeless veterans, high barrier Participants, homeless disabled persons, etc.)
3. What formal termination and grievance policies exist? Such policies must reflect HUD requirements that only the most severe cases be terminated and allowing Participants to return to the program once issues that caused the termination are resolved.
4. What policies exist that ensure all ESG providers are screening Participants for potential eligibility for other housing programs and services outside of the ESG program, within the agency, federal grant programs, or the local community?

Emergency Shelter Programs
All Emergency Shelter Programs supported by the ESG subrecipient using ESG funds must include the following in their Standards and Policies and Procedures documents:

1. The policies that govern:
    a. How Participants are admitted
    b. How Participants are diverted
    c. How Participants are referred to services and resources
    d. Length of stay
    e. Shelter operations (hours, staffing, admin)
    f. Safety/disasters
    g. Discharge policies
2. What safeguards exist to meet the safety and shelter needs of victims of domestic violence, stalking, and other related crimes?
3. What standards exist for assessing, prioritizing, and reassessing individual's and families' needs for services?
4. What targeting and outreach strategies exist for unsheltered persons?

Essential Service Programs and Street Outreach
All Essential Service and/or Street Outreach Programs supported by the ESG subrecipient using ESG funds must include the following in their Standards and Policies and Procedures documents:

1. What standards exist for assessing, prioritizing, and reassessing individuals' and families' needs for services?
2. What targeting and outreach strategies exist for unsheltered persons?

Rapid Re-Housing and/or Homelessness Prevention Programs
All Rapid Re-Housing and/or Homelessness Prevention Programs supported by the ESG subrecipient using ESG funds must include the following in their Standards and Policies and Procedures documents:

1. What standards exist for determining and prioritizing which eligible families/individuals will receive assistance?
2. What standards exist for determining the type, amount, and duration of housing stabilization and/or relocation services?
3. Are there any limits on the assistance that each program participant may receive, such as a maximum amount, months, and/or number of times of assistance?
4. What percentage or amount of rent and utilities costs must each program participant pay when receiving assistance?
5. How long can a program participant be provided with rental assistance?
6. Is the amount of assistance adjusted over time? How so?

Homeless Management Information System (HMIS) Reporting Standards

1. What HMIS comparable software standards exist for documenting Participant/family information, sub-population, income, case management tracking including identifying the case worker and detailed case management notes, tracking funding sources with Participant, housing stability outcomes and when Participant exits?
2. What standards exist to ensure data is accurate and maintained?
3. Recipients will actively participate in a coordinated entry system governed by the district CoC and will adhere to reporting changes directed by the CoC or ESG allocating agency.

Victims of Domestic Violence Reporting Standards

1. What standards exist for documenting required information for individuals and families fleeing or attempting to flee domestic violence?
2. What safeguards exist to ensure the safety of victims of domestic violence with regards to information documentation?

PROGRAM POLICIES AND PROCEDURES CERTIFICATION

I certify, if awarded ESG funding, the entity will have updated policies and procedures specific to ESG funding. These policies and procedures will include all requirements outlined in ADFA's ESG Program Policies and Procedures and will adhere to all Federal, State, and ADFA requirements.

Printed Name: _____ Title: _____

Signature: _____ Date: _____

21 Match Policy

ESG subrecipients are generally required to provide matching contributions equal to 100% of ESG funds awarded. Each monthly draw request must be supported by an equal amount of eligible match. Match contributions must be supported by source documentation and calculation worksheets. Match claimed for one reimbursement request cannot be reused for future draw requests. Match may consist of eligible cash or non-cash contributions from allowable sources.

Subrecipients must provide detailed calculations demonstrating how match amounts were derived, including:

Personnel Match

- Salary allocation calculations
- Fringe calculations
- Timesheets
- Payroll records
- Proof of payment

Volunteer Services

- Volunteer logs
- Sign-in sheets
- Service records
- Hourly valuation calculations

Donated Professional Services

- Donation letters
- Licensure documentation
- Documentation supporting billing rates

Donated Facilities, Equipment, or Space

- Donation agreements
- Fair market value support
- Appraisals or rental comparisons

All documentation must be cross-referenced so reviewers can trace reported amounts from the match summary through supporting records.

22 Program Year Closeout Subrecipient Checklist

ADFA ESG Program Year Closeout Subrecipient Checklist

Subrecipient Name:	_____	**Program Year:**	_____
Prepared By:	_____	**Date:**	_____

Use this checklist to confirm your ESG closeout process is complete. Keep all records organized and available for monitoring or audit review for at least 5 years after closeout.

Final Closeout Package

Document / Item	
Full program year expenditure summary (use template) *Provide total ESG expenditures for the grant period.*	☐ Included ☐ N/A
Full program year match summary (use template) *Provide total match contributed for the grant period. Do not submit files but ensure all files are retained according to policy requirements.*	☐ Included ☐ N/A
HMIS or comparable database final report *Submit the final HMIS report (used for CAPER).*	☐ Included ☐ N/A
Final performance summary (use template) *Provide total persons assisted and households assisted.*	☐ Included ☐ N/A
Client file review summary *Submit file review summary. Do not submit client files but ensure all files are retained according to policy requirements.*	☐ Included ☐ N/A
Payroll documentation, if applicable *Ensure you are keeping all files according to record retention policies. Submit only if requested.*	☐ Included ☐ N/A
Procurement records, only if applicable.	☐ Included ☐ N/A
Monitoring or audit finding resolution documents, only if applicable.	☐ Included ☐ N/A
Certification signed by an authorized subrecipient representative. *This is just a reminder to sign this form once complete.*	☐ Included ☐ N/A

Subrecipient Certification

I certify that the closeout items identified above have been completed and that the information submitted is accurate to the best of my knowledge.

Authorized Representative Signature:	_____	**Date:**	_____
Printed Name:	_____	**Title:**	_____
Organization:	_____	**Phone/Email:**	_____

23 Build America, Buy America (BABA) Certification

Build America, Buy America (BABA) Certification

The Contractor acknowledges to and for the benefit of the _____("Grantee") and the applicable federal housing program(s) that it understands the goods and services under this Agreement are being funded with monies made available by the applicable federal housing program(s) with federal funds from the United States Department of Housing and Urban Development (HUD).

The Contractor hereby represents and warrants to and for the benefit of the Grantee and the applicable federal housing program(s) that the Contractor has reviewed and understands, as required by federal law, that all of the iron, steel, manufactured products, and construction materials permanently incorporated into a project funded with assistance by the applicable federal housing program(s) must be produced in the United States in a manner that complies with the BABA requirement, unless a waiver is granted by the Office of Management and Budget (OMB) or the U.S. Environmental Protection Agency (EPA).

Notwithstanding any other provision of this Agreement, any failure to comply with this paragraph by the Contractor shall permit the Grantee or applicable federal housing program(s) to recover as damages against the Contractor any loss, expense, or cost incurred by the Grantee resulting from any such failure to comply with the contract.

As officers and representatives of _____
(Name of Contractor)

We, the undersigned have read and fully agree to the above and become a party to the full implementation of this program.

_____ _____
(Signature) *(Date)*

_____
(Title)

24 Definitions

The definitions below include, but are not limited to, definitions which pertain to the policies and procedures of the ESG program. HUD ESG definitions are outlined at 24 CFR Part 576.2.

At Risk of Homelessness: An individual or family who has an annual income below 30% area median income, does not have sufficient resources or support networks, and meets one of several conditions explained further at 24 CFR Part 576.2(1), (2), and (3).

Continuum of Care: A group of representatives or relevant organizations that are organized to plan for and provide a system of outreach, engagement, and assessment, emergency shelter rapid re-housing; transitional housing; permanent housing; and prevention strategies to address the various needs of homeless persons and persons at risk of homelessness for a specific geographic area. More detailed information on this definition can be found at 24 CFR Part 576.2.

Emergency Shelter: A facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements. More detailed information on this definition can be found in 24 CFR Part 576.2.

Homeless: An individual or family who lacks a fixed, regular and adequate nighttime residence, will imminently lose their nighttime residence, an unaccompanied youth under 25 years of age, individuals or families who are fleeing domestic violence. More detailed information on the definition of At Risk of Homelessness can be found in 24 CFR Part 576.2.

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

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

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

Recipient: ADFA

Subrecipient: A unit of general-purpose local government or NPO to which a recipient makes available ESG funds.

Unit of General-Purpose Local Government: Any city, county, town, township, parish, village, or other general purpose political subdivision of a State.

Urban County: A county that was classified as an urban county under 42 U.S.C. 5302(a) for the fiscal year immediately preceding the fiscal year for which ESG funds are made available.

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