

ESG

SUBRECIPIENT ORIENTATION

City of New Bedford
Office of Housing & Community Development
Joshua Amaral, Director

WELCOME

A copy of this presentation is now available on our website at https://www.newbedford-ma.gov/housing-community-development/.

Please feel free to contact our office at OHCD@newbedford-ma.gov if you require translation assistance with the PowerPoint.

Questions may be asked either through the chat box available through this Zoom meeting, or through email at OHCD@newbedford-ma.gov.

All comments and questions are welcome.



Una copia de esta presentación ya está disponible en nuestro sitio web en https://www.newbedford-ma.gov/housing-community-development/. No dude en ponerse en contacto con nuestra oficina en OHCD@newbedford-ma.gov si necesita asistencia de traducción con PowerPoint. Las preguntas pueden hacerse a través del cuadro de chat disponible a través de esta reunión de Zoom.

por correo electrónico a <u>OHCD@newbedford-ma.gov</u>. Todos los comentarios y preguntas son bienvenidos.

Las respuestas a las preguntas frecuentes se publicarán en línea en tres idiomas.

Uma cópia desta apresentação está agora disponível em nosso site em https://www.newbedford-ma.gov/housing-community-development/. Não hesite em entrar em contato com nosso escritório em OHCD@newbedford-ma.gov se precisar de ajuda na tradução do PowerPoint. As perguntas podem ser feitas através da caixa de bate-papo disponível nesta reunião do Zoom, ou através do e-mail OHCD@newbedford-ma.gov. Todos os comentários e perguntas são bem-vindos.

As respostas às perguntas frequentes serão publicadas on-line em três idiomas.

AGENDA

Purpose of Orientation
ESG 101 Basic Rules and Requirements
The Subrecipient Agreement

- A. Scope and Performance
- B. Reimbursements
- C. Activity Budget Summary
- D. Procurement
- E. Written Standards
- F. Certifications & Forms

Expectations

Past Compliance Problems

Potential Challenges

Next Steps

Resources







Purpose of Orientation

- To open or re-establish lines of communication.
- To reinforce the basic rules and requirements of the ESG program.
- To establish clear expectations concerning performance standards.
- To address broad program objectives, requirements and expectations that affect all projects at the beginning of the program year.
- To provide an overview of ESG administration at the outset of the contract term.
- To discuss potential challenges.





ORIENTATION | TRAINING | TECH ASSISTANCE

Typically held for groups of subrecipients at the beginning of the program year and addressing broad program objectives and requirements.

Conducted periodically throughout the program year to address specific program areas for larger groups of subrecipients and/or to provide guidance on project aspects.

Offered to individual subrecipients when the activity is in progress and a specific issue has arisen either through a question or in mitigating a problem.



BASIC RULES & REQUIREMENTS





- The City of New Bedford is an entitlement program for Emergency Solutions Grant (ESG) formula-based funding.
- The goal of the ESG program is to provide essential services to shelter residents, to rapidly re-house individuals and families experiencing homelessness and to prevent individuals and families from becoming homeless.
- This work is done by subrecipients who are contracted by the recipient of ESG funds (City of New Bedford through its Office of Housing & Community Development OHCD).
- Contracts between the OHCD and agencies who undertake the funded activities are called "Subrecipient Agreements."





- All subrecipients must comply with federal regulations and requirements and must abide by the terms of their Subrecipient Agreements.
- The information provided in this orientation is meant to supplement—not substitute—regulations and policies of the ESG program.





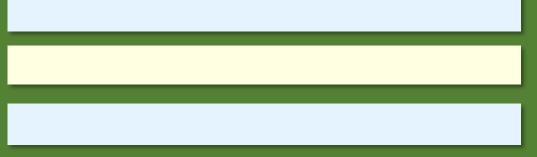
Entitlement and Administration	All subrecipients must comply with federal regulations and requirements and must abide by the terms of their Subrecipient Agreements.
Orientation	Held after City Council allocates awards and prior to start of the new program year beginning July 1 st . Purpose is to educate subrecipient agencies as to basic rules under which their ESG activities must operate and to establish clear expectations as to performance and administration
Subrecipient Agreements	The central part of the subrecipient compliance with the ESG program. Fulfills legal requirement and presents a concise statement of ESG program rules, conditions under which funds are provided and delineates fiscal and program performance.
Procurement Requirements	Agencies receiving federal funding must follow a free and open competitive process in securing products or services/undertaking construction activities. Proper documentation, documented outreach, etc. must be followed.
Site Visits	A site visit may be conducted to review the agency's fiscal, management and operational procedures, compliance with ADA and ESG requirements and to survey the program/services being offered.
Audits	If applicable, all agencies must provide an audit for the most recently audited year including any management letters and responses the agency has made to the audit. If not applicable, a reviewed Financial Statement signed by the Board President and Treasurer are required.





- ✓ The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) amended the McKinney-Vento Homeless Assistance Act and revised Emergency Shelter Grants as they previously existed.
- ✓ In 2012 the ESG Interim Rule took effect which changed Emergency Shelter Grants to Emergency Solutions Grants
- ✓ The name change reflected the program's new focus from addressing needs of people in emergency or transitional shelters to assisting people quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.





✓ There are 5 eligible ESG program components

Homeless Mgt Street Outreach Homeless Rapid Re-Housing **Emergency** Information System Prevention Shelter Assistance (HMIS)

Street Outreach

Services reaching out to unsheltered individuals/ families, connecting them with Emergency Shelter, housing, critical services, and providing them with urgent non-facility-based care.

Eligible costs: engagement, case mgt, emergency health and mental health services, transportation, services for special populations

Eligible persons: individuals and families who qualify under paragraph 1 of the homeless definition.

Emergency Shelter

Homeless Prevention

Rapid Re-Housing Assistance





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Emergency Shelter

Eligible costs: Renovation of a bldg. to serve as an ES.

Essential Services including case mgt, child care, employment assistance, outpatient health services, legal services, SA treatment svcs, transp, etc.

Shelter Operations including maintenance, rent, repair, security, fuel, equipment insurance, utilities, food, etc.

Eligible persons:

Individuals and families meeting criteria of homeless under 24 CFR 576.2

Homeless Prevention

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Homeless Prevention

Housing relocation and stabilization services and short and/or medium-term rental assistance as necessary to prevent individuals or family homelessness.

Eligible costs: rental assistance and rental arrears, financial assistance for rental application fees, security and utility deposits, utility payments, last month's rent and moving costs and services like housing search and placement, housing stability case management, landlord-tenant medication, tenant legal services, credit repair.

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Rapid Re-Housing Assistance

Housing relocation and stabilization services and/or short-and/or medium-term rental assistance as necessary to help homeless individuals or families (living in shelters or in places not meant for human habitation) move as quickly as possible into permanent housing and achieve stability.

Eligible costs: rental assistance and rental arrears, financial assistance: rental application fees, security and utility deposits, utility payments, last month's rent and moving costs and services: housing search and placement, hsg stability case mgt. credit repair, etc.



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Homeless Mgt Information System (HMIS)

ESG funds may be used to pay for data collection.

Eligible costs: Cost of participating in and contributing to the HMIS designated by the CoC (CaseWorthy). In the NB CoC all costs are borne by the City of NB OHCD.



Basic Program Requirements for Subrecipients...

- ✓ Consultation
- ✓ Match
- ✓ Obligations/Expenditure
- ✓ External Standards
- ✓ Internal Standards
- ✓ HMIS Participation
- ✓ Reporting

All subrecipients must consult and actively participate in the Continuum of Care

All subrecipients must match grant funds as a 1-1 from non-ESG sources; end of year match

All subrecipients must drawdown funds at least once each quarter, though preferably monthly

All subrecipients must abide by both the CoC's performance standards and operating standards

All subrecipients must develop operating policies and procedures for the program and the agency

All subrecipients must participate in the CoC's established HMIS

All subrecipients must complete and submit quarterly reporting to the OHCD







New for FY23 funding cycle

Subrecipient Agreement Format

- o Existing Subrecipient Agreement template has been updated to comply with HUD standards and requirements.
- o Overall, the new Subrecipient Agreement is very similar to the pervious version but many of the sections have been re-organized and standardized.
- o Appendix A (Scope, Performance Measures and Budget) has also been updated to include additional language regarding client eligibility and performance requirements / standards and monitoring.





Subrecipient Agreement

- ✓ The city is the recipient of federal ESG funding.
- ✓ As an agency awarded funding under this program, your agency must enter a
 contractual relationship with the city.
- ✓ The Subrecipient Agreement follows the fiscal year.
- ✓ The FY2023 agreement covers July 1. 2023 June 30. 2024.
- ✓ Subrecipient Agreements are detailed documents that serve as the basis for understanding the operation of the funded program and grant management.

Key Sections of the Agreement

- Signature Page
- Scope of Services
- Performance & Outcome Measurements
- Reimbursement Process / Form
- Budget Summary



Budget Amendment Process/Form

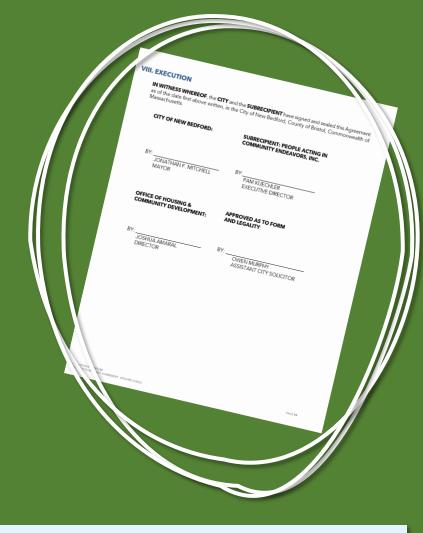
Procurement Policy





Executing the Agreement

- ✓ Not a legally executed contract until it is properly signed by each of the signatories for both the city and your agency.
- ✓ Agencies are required to sign the document first. Only an authorized signatory
 for your agency can sign the agreement.
- ✓ Once that's done, the city will then sign it.
- ✓ Agencies will receive a copy of the fully executed agreement for agency files.
- ✓ The executed agreement is central to all that is done relative to your funded project, its administration, operation and its performance.





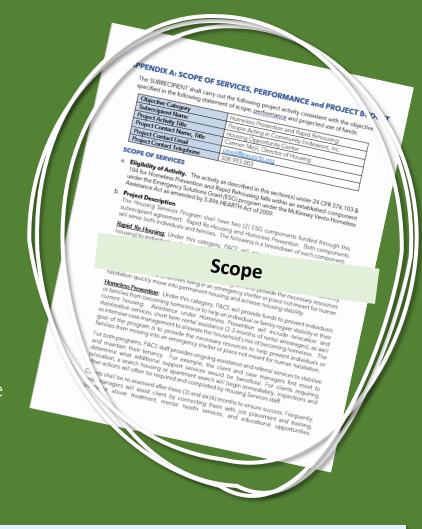


Appendix A: Scope of Services

- ✓ Describes what it is that is being funded and what you are agreeing to do as a result of that funding.
- ✓ Refined based on the amount of funding awarded
- ✓ Becomes the final agreed-upon description of the awarded activity

The Performance section includes...

- ✓ Total households to be served
- ✓ Total unduplicated people to be served including the number of those age 18 or over and 18 or below
- ✓ For HP only--Anticipated % of LMI people to be served.

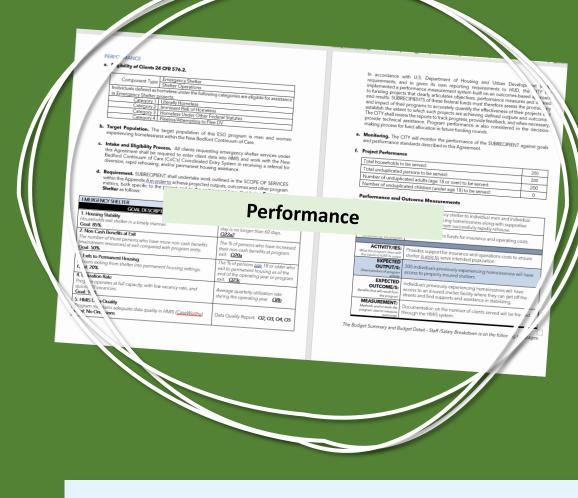




Performance and Outcomes

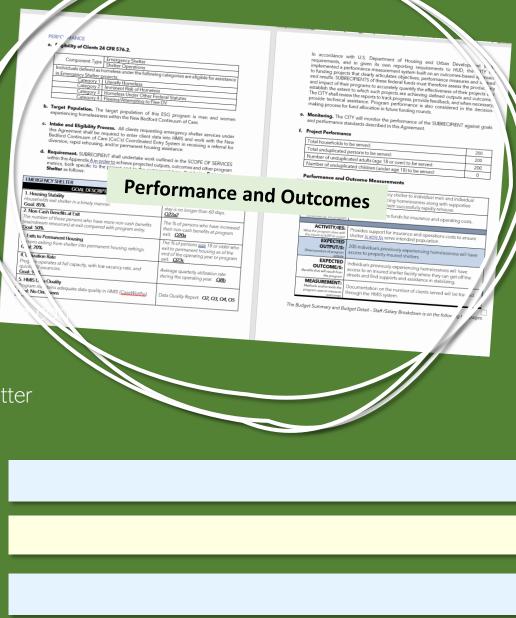
- ✓ The Performance Section contains a number of important requirements including:
 - Eligibility of Clients,
 - Target Population,
 - Intake Process,
 - OHCD Performance Standards
 - Monitoring
 - Project Performance #s
 - Performance and Outcome Measures





Performance and Outcomes

- ✓ Projects are expected to perform according to subrecipient agreement
- ✓ Projects are expected to perform according to subrecipient agreement
- ✓ Reporting on outputs and outcomes is due each quarter
- ✓ Understanding project performance benefits agencies by helping enswith, and movement toward, established performance targets
- ✓ The earlier any issues are revealed and discussed with OHCD, the better

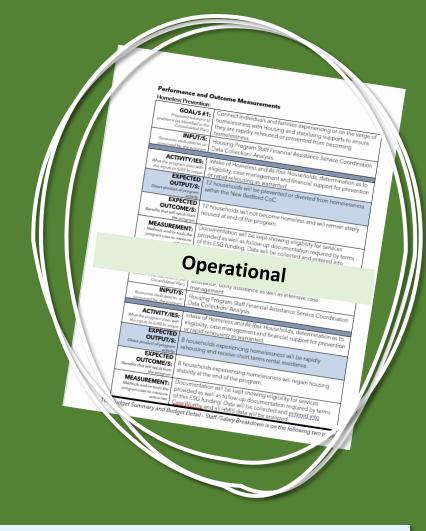




Operational Standards

✓ The operating standards each ESG project should be following:

https://www.nbhspn.com/nbhspn/wp-content/uploads/2019/09/OPERATIONAL-STANDARDS.pdf





Performance Standards

✓ Performance Standards are the means by which the effectiveness of the project is assessed according to HUD goals and standards.

https://www.nbhspn.com/nbhspn/wp-content/uploads/2019/09/PERFORMANCE-STANDARDS.pdf

- ✓ Individual standards have been created for all program types:
 - Emergency Shelter
 - Homeless Prevention
 - Rapid Re-Housing
 - Street Outreach
 - Coordinated Entry



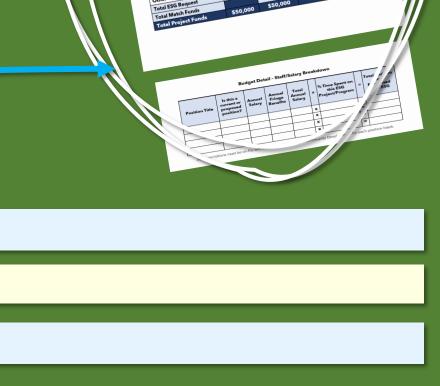


Activity Budget Summary

✓ The Activity Budget Summary outlines the overall project budget and provides a budget detail relative to project staffing.

The budget summary is broken down by line items and is intended to reflect both ESG funding and any additional project funding being leveraged from other sources, all of which is reviewed by both parties prior to executing the subrecipient agreement.

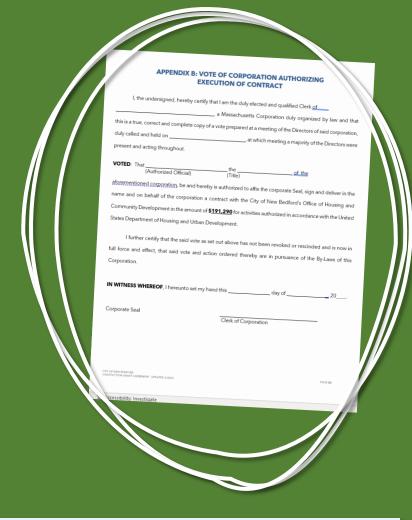
Where ESG funding is used to fund a position/s in whole or in part, this is identified in the budget detail staff/salary breakdown.





Appendix B: Vote of Corporation

- ✓ The Subrecipient Agreement also includes a blank copy of the Vote of Corporation Authorizing Execution of Contract
- ✓ As part of the RFP Application process, all subrecipient submitted a completed Vote of Corporation document.
- ✓ This document is only needed if the subrecipient changed its Authorized Official or individual authorized to sign and execute the Subrecipient Agreement.





Appendix D: Procurement

- ✓ Contact the OHCD first—before procuring goods, services, supplies or equipment.
- ✓ Goods and services must be procured according to MA General Law 30B and the subrecipient agreement.
- ✓ Procurement regulations were updated in July 2020 and are a part of the subrecipient agreement.
- ✓ Be sure to read the subrecipient agreement for procurement information.











Appendix D Compliance Reporting and Monitoring

- ✓ HUD requires reporting
- ✓ It's the means by which the productivity and impact of a program is assessed
- ✓ Quarterly reports are the performance outcome vehicle by which such productivity and impact is reviewed and measured
- ✓ Quarterly monitoring reports highlight the number of clients served in relation to the goals, outcomes and outputs agreed upon in the subrecipient agreement
- ✓ Quarterly monitoring reports serve as a tool to identify any issues with program compliance





Compliance Reporting

- ✓ Reports are due on the 10th of the month following the service period being reported (e.g. the first quarterly report for July 1, 2023 September 30, 2023 is due no later than October 10th).
- ✓ Payment of invoices can be delayed if reports are late, incomplete or inaccurate.
- ✓ Quarterly reporting includes statistical, narrative and budgetary components.
- ✓ As part of its Quarterly submission, each subrecipient must also submit an APR report from HMIS (CaseWorthy) for that specific quarter. This APR is the basis for Quarterly report data and narratives.
- ✓ A Training Session or individual TA will be made available upon request to ensure correctness in completing Quarterly Reports.
- ✓ Report forms will be provided to all subrecipients.





Compliance Reports

- ✓ Subrecipients will receive a Quarterly Evaluation Report template based on program type (component) and anticipated performance metrics.
- ✓ Data is captured in CaseWorthy (HMIS). The subrecipient is responsible for producing a report for the reporting period and completing the Quarterly Evaluation Report using that data.
- ✓ Step by step instructions as to how the CaseWorthy report for this purpose is pulled is available from the OHCD.





Compliance Reporting

- ✓ All ESG subrecipients are required to enter client data into CaseWorthy (HMIS).
- ✓ This should be done in real-time or as close to that as possible.
- ✓ When reviewing your program's data, the OHCD will contact you if data is incomplete or if data quality is problematic.
- ✓ Run reports often—do not wait for a quarterly report coming due to run one!





SAGE REPORTING required annually



Reporting

- ✓ All ESG program participants must first be given a Client Release of Information to execute demonstrating their consent to participate in both the local NB HMIS as well as the State Rehousing Data Collective.
- ✓ The Client Release Form includes consent of all household members and an option for client revocation of consent.
- ✓ The Client Release Form is available in English and Spanish online at: https://www.nbhspn.com/for-agencies/







To provide you with the most effective and efficient service, we must collect relevant data for

Homeless Management Information System (HMIS). This secure and confidential database operated by trained representatives allows providers to work together with you to make sure you are receiving the assistance you need in a timely manner. Beyond that, the HMIS allows the local "Continuum of Care" to get an accurate count of all people experiencing that, the infini allows the local "Continuum or Care" to get an accurate court homelessness or who are at risk of homelessness in the City of New Bedford.

To help us serve you and in order to improve our current service system we need to collect your personally identifiable information (PII). To better coordinate with other agencies, you have the right to consent to release your information to these other agencies.

Please review the information below and sign and date where indicated.

If you have a family household, please complete the back of this form as well].

I understand that this agency will enter my information into the Homeless Management Information System (HMIS). The information I have provided is true and correct. My information may be shared among System (FIRMIS), the informations have provided is true and sources, my information may be more a more local (Bristol County) authorized service providers for the purpose of connecting me to services. Additionally my information will be shared with a database (State Rehousing Data Collective) held by the taith of Massachusetts to better understand and coordinate services.

I understand that information about me that is in HMIS may be used by the agency and the New Bedford Continuum of Care (as well as the Fall River Continuum of Care and Greater Bristol County Attleboro Taunton Continuum of Care) to conduct research related to homelessness and housing programs, service needs, income supports, education and employment and program effectiveness. My complete name, date of birth, full social security number, or other information that would identify me personally will never be shared with anyone without my authorization.

An agency representative has answered my questions about my privacy concerns.

By signing this release form, I fully understand the above terms and conditions.

CLIENT NAME [PRINT]	ATE	CLIENT SIGNATURE	DATE
AUTHORIZED STAFF NAME PRINT]	DATE	AUTHORIZED SIGNATURE	DATE

Client Consent on Behalf of Household Members

An adult head of household may provide consent on behalf of family members to share their information in the HMIS.

FAMILY MEMBER NAME 1 [PRINT]	HEAD OF HOUSEHOLD [INITIALS]		
FAMILY MEMBER NAME 1 [PRINT]	HEAD OF HOUSEHOLD [INITIALS]		
FAMILY MEMBER NAME 2 [PRINT]	HEAD OF HOUSEHOLD [INITIALS]		
FAMILY MEMBER NAME 3 [PRINT]	HEAD OF HOUSEHOLD [INITIALS]		
FAMILY MEMBER NAME 4 [PRINT]	HEAD OF HOUSEHOLD [INITIALS]		
FAMILY MEMBER NAME 5 [PRINT]	HEAD OF HOUSEHOLD [INITIALS]		
FAMILY MEMBER NAME 6 [PRINT]	HEAD OF HOUSEHOLD [INITIALS]		
FAMILY MEMBER NAME 7 [PRINT]	HEAD OF HOUSEHOLD [INITIALS]		

Client Revocation of Consent

If client checks this box and signs their name below, they are indicating their intent to rescind/cancel the authority and consent previously granted herein as of the date noted.

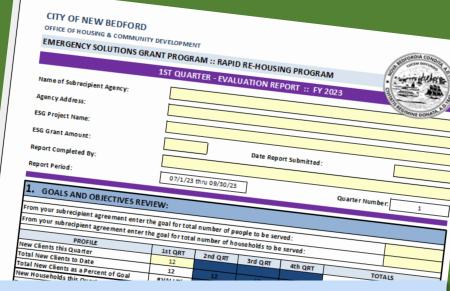
JENT NAME [PRINT]	DATE	FAMILY MEMBER NAME [PRINT]



- ✓ Programs are <u>formerly monitored</u> for compliance on an annual basis and on an <u>ongoing basis</u> to ensure performance objectives are on schedule and within budget.
- ✓ Monitoring is an effective management tool to ensure satisfactory operation

Formal Monitoring

- Annual risk assessment to determine onsite formal monitoring visits
- Enhanced focus on compliance with all regulations governing admin, financial and program operations
- New programs and those with previous year findings automatically monitored;
 otherwise, programs formally monitored every three years

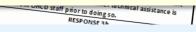


Ongoing Monitoring

- Can be both desk audit or onsite monitoring
- Enhanced focus on meeting performance objectives, scheduling targets and budget issues
- Regular monitoring concurrent with invoicing and quarterly reporting

Quarterly Monitoring





✓ Scope of Services Consistency with actual activities

✓ Accomplishments
Planned vs. Actual

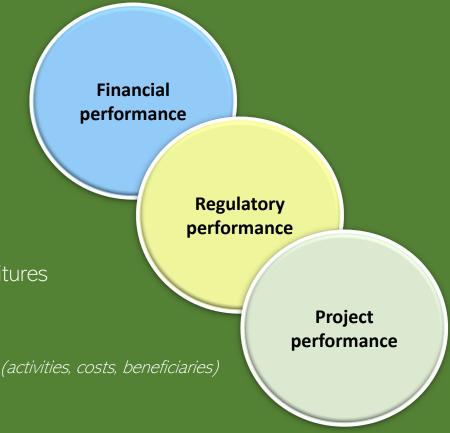
✓ Time of Performance Program start-up issues

✓ Budget Compare actual expenditures vs. planned expenditures

✓ Requests for Payment Timeliness

✓ Recordkeeping Comprehensiveness/accuracy of documentation (activities, costs, beneficiaries)

✓ Financial Management Systems in place (accounting, expenses, income)







- ✓ All ESG programs must use ESG forms provided by the OHCD
- ✓ The majority of these forms constitute client files.
 - CLIENT FILE CHECKLIST
 - FORM 00 HOMELESS HISTORY

TIMELINE

FORM 01 HOMELESS

CERTIFICATION

FORM 02 AT RISK OF

HOMELESSNESS

FORM 03 CHRONIC HOMELESS

CERTIFICATION

FORM 04 DISABILITY CERTIFICATION

FORM 05 SELF CERTIFICATION

FORM 06 STAFF AFFIDAVIT OF ELIGIBILITY

FORM 07 VERIFICATION OF TRACKING

INCOME

FORM 08 VERIFICATION OF INCOME

FORM 09 CALCULATION WORKSHEET

FORM 10 RENT REASONABLENESS CHKLST

FORM 11 HOUSING HABITATILIBYT STDS

INSP.

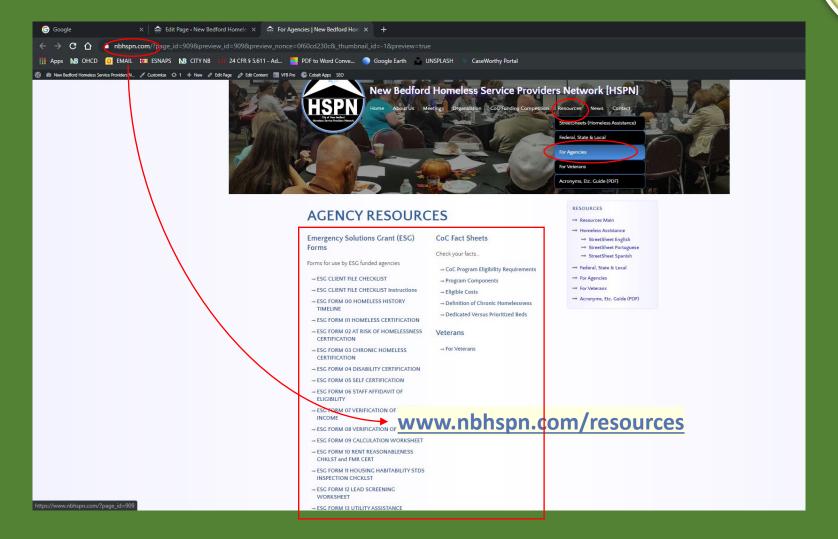
FORM 12 LEAD SCREENING WORKSHEET

FORM 13 UTILITY ASSISTANCE ELIGIBILITY





✓ Where one can access ESG forms online:



Regulatory performance



✓ There are performance standards for every type of ESG component:

Project performance

GOALS	PERFORMANCE STANDARD			
STREET OUTREACH				
Outreach – Number of unduplicated persons contacted increases. (Q9a) Goal: 10%	The number of unduplicated persons <u>contacted</u> each year increases by 10%.			
2. Outreach – Number of unduplicated persons contacted increases. (Q9b) Goal: 10%	The number of unduplicated persons <u>engaged</u> each year increases by 10%.			
3. Housing Destination – Unduplicated persons placed in permanent housing destinations as a result of street outreach services. (Q23c) Goal: 10%	The % of persons served who move from the streets to permanent housing destinations as a result of street outreach services.			
4. HMIS – Program maintains adequate data quality in HMIS. (Q2,3,4 & 5) Goal: No Omissions	See Data Quality Report.			



✓ There are performance standards for every type of ESG component:

Project performance

GOALS	PERFORMANCE STANDARD			
EMERGENCY SHELTER				
1. Housing Stability - Households exit shelter in a timely manner. (Q22a2) Goal: 85%	The % of households whose length of stay is no longer than 60 days.			
Non-Cash Benefits at Exit—Persons who increase non-cash benefits (mainstream resources) at exit as compared with entry. (Q20a) Goal: 50%	The % of persons age 18 or older who increased their non-cash benefits <i>(mainstream resources)</i> at program exit.			
3. Exit to Permanent Housing – (Q23c) Goal: 20%	The % of persons age 18 or older who exit to permanent housing as of the end of the operating year or program exit.			
4. Utilization Rate - Program operates at full capacity, with low vacancy rate, and quickly fills vacancies. (Q8b) Goal: 90%	Average daily utilization rate during the operating year. (NOTE – For ESG programs, this goal can only be measured on a quarterly basis and for units. Cannot calculate beds.)			
5. HMIS-Program maintains adequate data quality – (Q2,3,4 & 5) Goal: No Omissions	Data Quality Report			



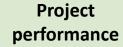
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Project performance

GOALS	PERFORMANCE STANDARD			
HOMELESS PREVENTION				
Housing Stability – Ability to maintain the housing they had at project entry—with/without a subsidy—or move into other permanent housing (Q24 1-8 Categories) Goal: 75%	The % of persons who have remained in permanent housing at program exit.			
2. Non-Cash Benefits at Exit—The number of those who have more non-cash benefits at exit than at entry. (Q20a) Goal: 50%	The % of persons who have increased their non-cash benefits at program exit.			
5. HMIS – Program maintains adequate data quality in HMIS. (Q2,3,4 & 5) Goal: No Omissions	See Data Quality Report.			



✓ There are performance standards for every type of ESG component:



GOALS	PERFORMANCE STANDARD			
RAPID REHOUSING (ESG)				
1. Housing Stability – Persons residing in rapid rehousing will remain in this housing for a minimum of one year or exit to other permanent housing. (Q1 & Q23a / b) Goal: 85%	The % of persons who remain in the RRH program as of the end of the operating year or exited to PH during the operating year.			
2. Length of Time Between Entry and Move-In - Persons length of time between program entry and placement shall be timely (Q22c) Goal: 80%	The % of persons whose length of time between project entry and housing placement will be no longer than 14 days.			
3. Non-Cash Benefits – Persons will increase non-cash benefit <i>(mainstream resources)</i> income. (Q20a) Goal: 85%	The % of persons age 18 or older who increased their non-cash benefit income (<i>mainstream resources</i>) as of the end of the operating year or program exit.			
4. Utilization Rate - Program operates at full capacity, with low vacancy rate, and quickly fills vacancies. (Q8b) Goal: 90%	Average daily utilization rate during the operating year. (NOTE – For ESG programs, this goal can only be measured on a quarterly basis and for units. Cannot calculate beds.)			
5. HMIS – Program maintains adequate data quality in HMIS. (Q2,3,4 & 5) Goal: No Omissions	See Data Quality Report.			



o Income Certifications

- ✓ Participants in ESG (HP and RRH) funded programs are required to complete and sign an income certification form.
- ✓ OHCD annually provides subrecipients with an Income Certification Form (in three languages) that lists specific income limits for the program year.
- ✓ All subrecipients should be using FY2023 Forms. Older forms will not be accepted.
- ✓ For an agency to be able to count a participant, the program participant must complete the required Income Certification form.





o Appendix E: Reimbursements Process

- ✓ All grant awards are reimbursements
- ✓ Agencies invoice for payment of eligible reimbursables using a "Request for Reimbursement" form
- ✓ Reimbursement requests can be submitted monthly (preferred) or quarterly
 - Monthly requests reflect the previous month

 Example: Reimbursement for eligible program activities in July must be submitted by August 10th.
 - Quarterly requests reflect quarter previous to submission Example: A second quarter reimbursement request must be submitted by January 10th
- ✓ All reimbursement requests must include invoices, receipts, cancelled checks and other documentation justifying the claimed reimbursement costs.





- ✓ Expenses for FY23 must fall between July 1, 2023 through June 30, 2024 only.
- ✓ Costs incurred prior to July 1, 2023 are ineligible.
- ✓ Final invoices for Fiscal Year 2023 must be submitted no later than July 5, 2024.

Reimbursements must...

- Be accompanied by supporting documentation
- Show how reimbursable items conform to scope
- Include explanatory documentation notes as needed

Reimbursements must NOT...

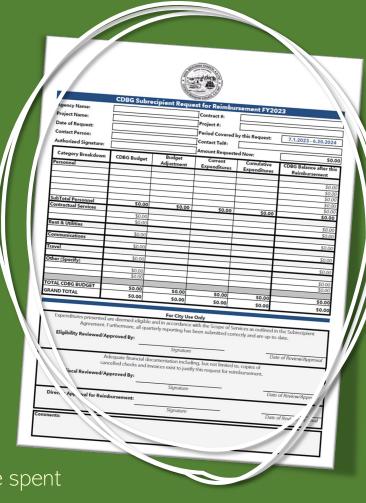
- Include state/ federal taxes or late fees or prohibited unallowed unallocable expenses
- Be submitted after the due dates





Subrecipient Request for Reimbursement Form

- ✓ The Subrecipient Request for Reimbursement Form provides an itemized breakdown of the approved ESG budget.
- ✓ This is the coversheet to all invoicing to the city.
- ✓ Form tailored to your budget/project will be provided to you prior to program year.
- ✓ Form requires information on:
 - Category Breakdown (line items)
 - ESG Budget—dollar amount allocated from ESG grant award
 - Budget Adjustment—city-approved modification
 - Current Expenditure—dollar amount being billed to ESG
 - Cumulative Expenditures—dollar amounts year to date
 - ESG Balance after Reimbursement—dollar amount of ESG award remaining to be spent





- ✓ All requests must include the completed form and supporting documentation
 - Date of Request
 - Authorized Signature
 - Period Covered by request

- Amount of request
- Current expenditures
- Remaining balance



... when all documentation is acceptable.

✓ Checks are generally available...

...about two weeks from the date the OHCD receives acceptable documentation.





Budget Amendment Process

- ✓ Form used by subrecipients to request a budget amendment in order to modify that which was originally allocated.
- ✓ Modifications are considered amendments and must reflect a zero net change to the project budget.
- ✓ Process for making a budget amendment request:
 - Submit a cover letter to the OHCD from the agency, signed by the authorized signer, formally requesting the amendment with an explanation as to why this modification is needed.
 - Submit a completed OHCD budget amendment form with the signed cover letter to the OHCD.
 - A determination as to its eligibility and allowability is made by the OHCD and subrecipient is advised as to approval/rejection.
 - If approved, a subrecipient agreement amendment is executed that includes an updated scope and budget.





o Appendix F: 2 CFR Part 200, Appendix II

- ✓ Participants in ESG-funded programs are also required to comply with federal contract provisions under 2 CFR Part 200..
- ✓ These provisions or requirements have been outlined in Appendix F and made part of your contractual obligations.
- Essentially, Part 200 combined eight OMB Circulares or regulations to create one resource or uniform guidance for federal awardees.
- ✓ Contract provisions include guidance on: Financial Management, Internal Controls, Property / Equipment Requirement, Procurement, Contracts, Subrecipient / Contractor Requirements etc..





o Appendix G: ESG Written Standards

- ✓ There are 9 major standards for providing ESG assistance in New Bedford:
 - Standard policies and procedures for evaluating eligibility for ESG assistance
 - Standards for targeting/providing essential services related to Street Outreach
 - Policies and procedures for admission, diversion, referral and discharge by emergency
 - Policies and procedures for assessing, prioritizing and reassessing individual/family needs for essential services related to Emergency Shelter
 - Policies and procedures for coordination among emergency shelter providers, essential service workers, HP and RRH assistance providers, mainstream service and housing providers, etc. (CoC)
 - Policies and procedures for determining and prioritizing which eligible persons will receive HP assistance and which eligible persons would receive RRH assistance.
 - Standards for determining the share of rent and utility costs program participants must pay in HP or RRH.
 - Standards for how long recipients may receive rental assistance and how its adjusted over time.
 - Standards for determining type/amount/duration of housing stabilization and/or relocation services for HP or RRH program participants.



ATTACHMENT E

STANDARDS FOR PROVISION OF ESG ASSISTANCE IN NEW BEDFORD Standard policies and procedures for evaluating individuals' and families' eligibility for

Per 24 CFR 576.401 ESG Sub-recipients must conduct an initial evaluation to determine each For an armony experiment of the second of th manyaus or family sengularly so the assumance and the advance and the selections the individual or family needs to regain stability in permanent housing. These evaluations the intrivious of rammy needs to regain statumy in permanent nousing. These evaluations must be conducted in accordance with the centralized or coordinated assessment must be conducted in accordance with the centralized or coordinated assessment requirements set forth under \$576,400(d) which is pending development by the Continuum

The Coordinated Entry process will be based on requirements established by HUD.

ESG sub-recipients must re-evaluate the program participant's eligibility and the types and amounts of assistance the participant needs; not less than once every three (3) months for amounts of assistance the participant needs, and less than once participants who are receiving homelessness prevention assistance, and not less than once annually for participants who are receiving rapid re-housing assistance.

At the sub-recipient's discretion, re-evaluations may be conducted more frequently than At the suc-recipient's discretion, re-evaluations may be considered more inequality and required by 24 CFR 576 401 and may also be incorporated into the case management process required by <u>Callery Dates</u> and may and be uncorporated into the lase stimingstones. Providing which must occur not less than monthly for homeless prevention and rapid re-housing which must occur not less than monthly for nomeless prevention and rapid re-mounting participants - Sec 24 CFR 576.401 (e) (f). Regardless of which timeframe is used, re-

The program participant does not have an annual income that exceeds thirty (30) percent are program participant uses not have an annual income that exceeds thirty (30) percent of median family income for the area, as determined by HUD; and the program of median ramuly income for the area, as determined by five, and the program participant lacks sufficient resources and support networks necessary to retain housing participant tacks sufficient resources and support networks necessary to setten nousing without ESG assistance. To determine if an individual or family is income eligible, the values and assistance, so determine a an unity squar or taining is income enginee, the sub-recipient must examine an individual or family's annual income to ensure that it does

Note: Annual income must be below thirty (30) percent at the time of the initial evaluation. When the program participant's income or other circumstances change (e.g., changes in When the program participant's income or other circumstances change (e.g., changes in household composition) that affects the program participant's need for assistance under the program participant in the pro household composition) that affects the program participant's need for assurance under ESG, the sub-recipient must re-evaluate the program participant's eligibility and the amount and types of assistance the program participant needs.

Sub-recipients must assist each program participant, as needed, to obtain appropriate supportive services, including assistance in obtaining permanent housing, medical health supporture services, including assessment in vocating pressurem notioning, mental real treatment, counseling, supervision, and other services essential treatment, mention reaum treatment, counseums, supervision, and other services essential for achieving independent living; housing stability case management, and other Federal, for activiting independent availg, nousing stability case management; and other recersi, State, local, or private assistance available to assist the program participant in obtaining





Past Compliance Problems

Subrecipients do not ensure that their entire staff is "on board" and clear as to the program operation and administration.

Incomplete Income Certifications.

Required forms are not used or are modified.

Not informing OHCD of a change in agency staffing

Hesitancy in asking for help.

Failure to empower agency staff

Incomplete Reports.

"Umm...we didn't know there were ESG forms..."

Last minute budget amendment requests

Data Quality

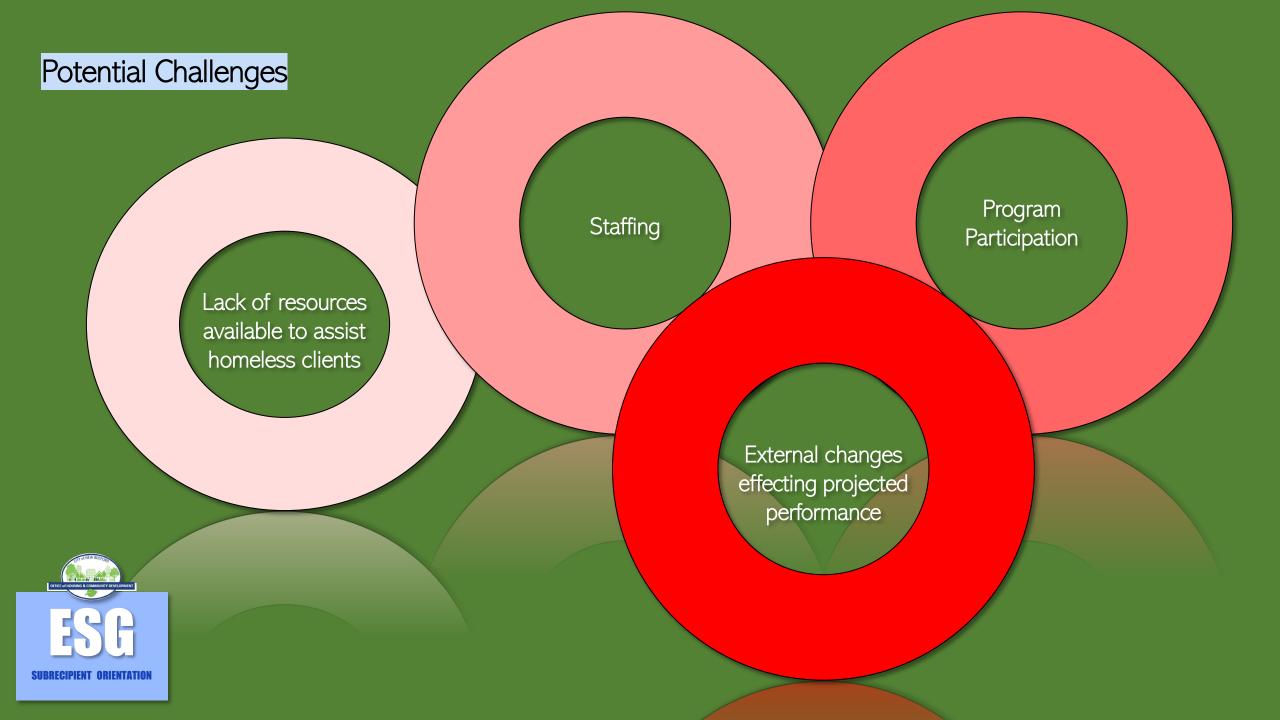
"Housing First doesn't work."

Late Submission of Quarterly Reporting.

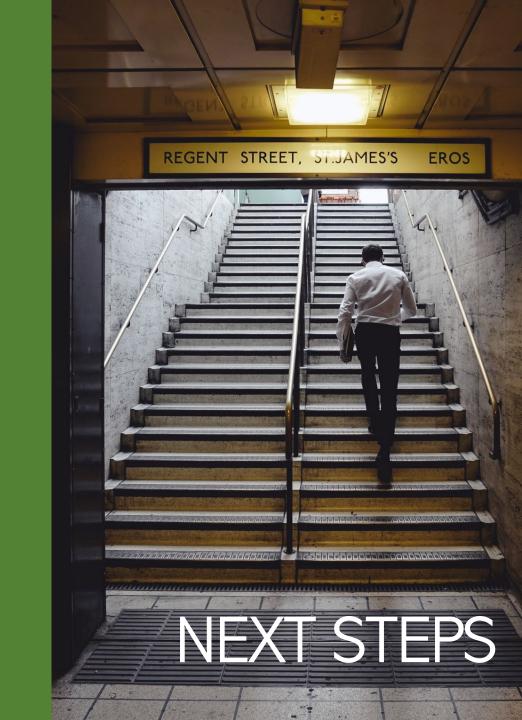








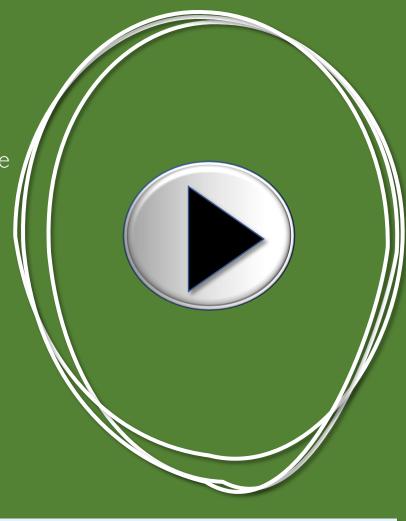




Next Steps

- ✓ Review your program and review ESG requirements.
- ✓ Ensure you've signed a System User Agreement and that all new system users are registered with the OHCD and working with their HMIS Admin Lead.
- ✓ All ESG subrecipients are required to upload their annual CAPER Reports into HUD's reporting system called SAGE.
- ✓ Review and use ESG forms.
- ✓ Ensure all staff is acclimated to operation and expectations of program.
- ✓ Ask questions.
- ✓ Execute and return subrecipient agreement to the OHCD.
- ✓ Reimbursements for activities after July 1, 2023 may be submitted once you've received your fully executed Subrecipient Agreement.
- ✓ The first quarterly report (July Sept) is due October 10th.









Resources

OHCD Staff

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Joe Maia Grants Compliance Coord Program Questions

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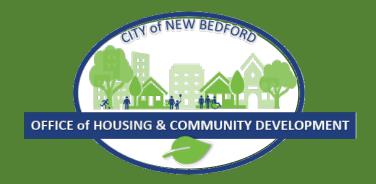
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o ESG Program

Overview and Directory

https://www.hudexchange.info/programs/esg/





ESG

SUBRECIPIENT ORIENTATION

City of New Bedford
Office of Housing & Community Development
Joshua Amaral, Director