

City of Montgomery ESG Training

April 22, 2022



Morning Agenda

9:00 – 9:45am: ESG Program Overview

9:45 – 10:30am: ESG Eligible Activities Part 1

10:30 – 10:45am: Break

10:45 – 11:15 am: ESG Eligible Activities Part 2

11:15 – 11:30am: Rental Assistance Requirements

11:30am – 12:00pm: Determining Homeless Eligibility

12:00 – 12:45pm: Lunch Break



Afternoon Agenda

12:45 – 1:30pm: HUD Preferred Order of Documentation and Documenting Eligibility

1:30 – 1:45pm: Importance of Documentation

1:45 – 2:00pm: Break

2:00 – 2:15pm: HMIS

2:15 – 2:45pm: Performance Measures and Reporting

2:45 – 3:00pm: Resources, Q&A, and Next Steps



Objectives

1. Understand HUD and City of Montgomery Community Development ESG requirements
2. Identify and access resources to build your capacity to find information and ask questions



ESG Program Overview



General Program Requirements for ESG



Eligible Activities

1. Street Outreach
2. Emergency Shelter
 - Essential Services and Operations
 - Rehab and Renovation
3. Homelessness Prevention
4. Rapid Re-housing



General Program Requirements

Match Requirements

- Must match 100% of ESG funds received
- Match may be provided from federal, state, local, or private sources, unless:
 - Program rules prohibit the use of those funds as match
 - ESG is used as match for the other source
- Match may be cash or non-cash (in-kind)
- Program income must be considered match



General Program Requirements

Match Requirements

- Subrecipients must complete the match certification form as part of the subrecipient agreement.
- Must document the amount and source of match and submit this information with invoices.

| PROGRAM TYPE: (check all that apply): | | |
|--|--|--|
| Emergency Shelter X | Street Outreach <input type="checkbox"/> | Homeless Prevention <input type="checkbox"/> HMIS <input type="checkbox"/> |
| TOTAL GRANT AWARD: | | |
| MATCH DOCUMENTATION (use additional sheets if necessary and attached to the back of this sheet) 1:1 Matching Funds | | |
| MATCH SOURCE | MATCH AMOUNT | DESCRIPTION |
| 1 | \$ | |
| 2 | \$ | |
| 3 | \$ | |
| 4 | \$ | |
| 5 | \$ | |
| 6 | \$ | |
| 7 | \$ | |
| 8 | \$ | |
| 9 | \$ | |
| 10 | \$ | |
| TOTAL MATCH AMOUNT | | |
| CERTIFICATION | | |
| <p>The undersigned individuals do, by their respective oaths solemnly swear and affirm as follows:</p> <ul style="list-style-type: none"> • That the Subrecipient completing this Match Certification has verified the eligibility of the match item(s) to which this certification relates; • That the Subrecipient has reviewed the Federal Guidelines regarding the match requirement; • That the subrecipient will verified that the funds used to Match the ESG Program are not being used to match any other grant; • That the Subrecipient will collect and provide valid documentation for Match for which this Match Certification relates, and that all representations made by the Subrecipient in this Match Certification are true and correct. | | |
| Executive Director Signature _____ | | Date _____ |
| Executive Director Print Name _____ | | |



General Program Requirements

Coordination with targeted homeless services

- Recipients and subrecipients must coordinate ESG-funded activities with other programs that target homeless households, including (but not limited to):
 - Continuum of Care Programs
 - PATH
 - HUD-VASH
 - Health Care for the Homeless



General Program Requirements

Coordination with mainstream resources

- Must coordinate ESG-funded services with mainstream resources for which homeless households might be eligible, including:
 - Public housing programs, including HCVP
 - Community Health services
 - Employment programs
 - Education programs
 - Temporary Assistance for Needy Families
 - State Children's Health Insurance Program
 - Head Start
 - Mental Health and Substance Abuse Block Grants



General Program Requirements

Consultation with the CoC

- Must consult with the CoC on:
 - How to allocate ESG funds
 - Development of project performance standards, including outcome measures for projects and activities
 - Funding and policies and procedures for HMIS administration and operations



General Program Requirements

Coordinated Entry

- ESG-funded programs must use the coordinated entry system.
- HUD defines **Coordinated Entry** as a process developed to ensure that all people experiencing a housing crisis:
 - have fair and equal access and
 - are quickly identified, assessed for, referred, and connected to housing and assistance,
 - based on their strengths and needs.
- Coordinated Entry's core elements are:
 - Access
 - Assessment
 - Prioritization
 - Referral



General Program Requirements

Coordinated Entry

- ESG-funded programs must use the coordinated entry system.
- Must work with the CoC to ensure that the screening, assessment, and referral of participants are consistent with ESG written standards.
 - Victim service providers may choose not to use the coordinated entry system.
- Program participant eligibility evaluations must be conducted in accordance with the coordinated entry requirements.
- Must keep documentation showing your program is using the CoC's coordinated entry system



General Program Requirements

Written Standards

- As the ESG Recipient, Montgomery Department of Community Development develops and must consistently apply written standards for providing ESG assistance.
- ESG-funded programs must adhere to the written standards.



General Program Requirements

Written Standards

- Written Standards must establish Policies and Procedures for the following:
 - Evaluating Eligibility
 - Targeting and services for Street Outreach
 - Policies governing stays in Emergency Shelter
 - Policies governing essential services related to Emergency Shelter
 - Priorities for receipt of Homelessness Prevention and Rapid Re-housing Assistance
 - Coordination among providers
 - Participant contributions for Homelessness Prevention and Rapid Re-housing Assistance
 - Duration and amount of rental assistance (incl. any caps)
 - Duration and amount of stabilization and/or relocation services (incl. any caps)



General Program Requirements

Termination of Assistance

- May terminate a program participant if they violate program requirements
- Must establish and follow a formal termination process that recognizes the rights of individuals affected
 - Must include an appeals process
- Must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination
- A program participant's assistance should be terminated only in the most severe cases.
- Termination does not bar the ESG-funded program from providing further assistance at a later date to the same family or individual.



General Program Requirements

Termination of Assistance

- For those receiving rental assistance or housing relocation or stabilization services, the formal termination process must, at a minimum, include:
 - Written notice to the program participant containing a clear statement of the reasons for termination;
 - A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate person) who made or approved the termination decision; and
 - Prompt written notice of the final decision to the program participant.



General Program Requirements

HMIS Participation

- ESG-funded programs must participate in the CoC's Homeless Management Information System (HMIS).
- Must enter client-level data (data on all persons served) and activity-level data (data on activities assisted under ESG).
- Victim service providers may choose to use a comparable database which must be consistent with HUD data and technical standards.



General Program Requirements

Faith-Based Organizations

- Eligible for funds on same basis as other organizations
- Must not engage in inherently religious activities as part of ESG-funded activities
- Must not discriminate in the provision of assistance based on religion or religious belief
- Must not use ESG funds to rehabilitate structures used for inherently religious activities (e.g., chapels or sanctuaries)



Knowledge Check

Written Standards are developed by each program for its own staff and clients to follow.

- True
- False



Knowledge Check

Entering client data into HMIS or a comparable database is optional for Street Outreach and Emergency Shelter.

True

False



ESG Eligible Activities



Eligible Activities

1. Street Outreach
2. Emergency Shelter
 - Essential Services and Operations
 - Rehab and Renovation
3. Homelessness Prevention
4. Rapid Re-housing



Eligibility for ESG Program Components

| | Category 1: Literally Homeless | Category 2: Imminent risk of Homelessness | Category 3: Homeless Under Other Federal Statutes | Category 4: Fleeing/ Attempting to Flee DV | At-risk of Homelessness |
|-------------------------|-----------------------------------|--|--|--|-------------------------|
| Street Outreach | X | | | X | |
| Emergency Shelter | X | | X | X | |
| Rapid Re-housing | X | | | X | |
| Homelessness Prevention | | X | X | X | X |



Street Outreach



Street Outreach

- **Eligible Program Participants**
 - Unsheltered individuals and families (those who qualify under Category 1)
- **Overview of Eligible Activities**
 - *Essential services* to eligible participants provided on the street or in parks, abandoned buildings, bus stations, campgrounds, and in other such settings where unsheltered persons are staying.
 - *Staff salaries* related to carrying out street outreach activities.



Street Outreach

Engagement

- Activities to locate, identify and build relationships with **unsheltered homeless people** for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs.
- **Eligible costs**
 - Initial assessment of needs and eligibility
 - Providing crisis counseling
 - Addressing urgent physical needs
 - Actively connecting and providing info and referral
 - Cell phone costs of outreach workers



Street Outreach

Case Management

- Accessing housing and service needs, and arranging/ coordinating/monitoring the delivery of individualized services.
- Eligible costs
 - Using coordinated entry system
 - Initial evaluation/verifying and documenting eligibility
 - Counseling
 - Developing/securing/coordinating services
 - Helping obtain federal, state, and local benefits
 - Monitoring/evaluating participant progress
 - Providing information and referral to other providers
 - Developing an individualized housing/service plan



Street Outreach

Emergency Health Services

- Outpatient treatment of urgent medical conditions by licensed medical professionals in community-based settings (e.g., streets, parks, campgrounds) to those eligible participants unwilling or unable to access emergency shelter or an appropriate healthcare facility.
- Eligible costs
 - Assessing participants' health problems and developing treatment plans
 - Assisting participants to understand their health needs
 - Providing or helping participants to obtain appropriate emergency medical treatment
 - Providing medication and follow-up services



Street Outreach

Emergency Mental Health Services

- Outpatient treatment of urgent mental health conditions by licensed medical professionals in community-based settings (e.g., streets, parks, campgrounds) to those eligible participants unwilling or unable to access emergency shelter or an appropriate healthcare facility.
- Eligible costs
 - Crisis interventions
 - Prescription of psychotropic medications
 - Explain the use and management of medications
 - Combinations of therapeutic approaches to address multiple problems



Street Outreach

Transportation

- Travel by outreach workers, social workers, medical professionals, or other service providers during the provision of eligible street outreach services.
- Eligible costs
 - Transporting unsheltered persons to emergency shelters or other service facilities
 - Cost of a participant's travel on public transit
 - Mileage allowance for outreach workers to visit participants
 - Purchasing or leasing a vehicle for use in conducting outreach activities, including the cost of gas, insurance, taxes, and maintenance of the vehicle
 - Costs of staff to accompany or assist participants to use public transportation



Street Outreach

Services to Special Populations

- Otherwise eligible Essential Services 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.
- Eligible costs
 - Engagement
 - Case Management
 - Emergency Health Services
 - Emergency Mental Health Services
 - Transportation



Knowledge Check

ESG only covers transportation costs for travel by program participants, not staff.

True

False



Emergency Shelter



Emergency Shelter

- **Eligible Program Participants**
 - Individuals and families who are literally homeless or fleeing/attempting to flee DV
- **Overview of Eligible Activities**
 - Essential services to persons in emergency shelters, renovating buildings to be used as emergency shelters, and operating emergency shelters.
 - Staff costs related to carrying out emergency shelter activities.



Emergency Shelter

Eligible Costs Overview

- Essential Services
- Renovation
- Shelter Operations
- Assistance Required Under URA



Emergency Shelter

Essential Services

- Services provided to individuals and families who are in an emergency shelter.

Eligible costs

- Case management
- Child care
- Education services
- Employment assistance and job training
- Outpatient health services
- Legal services
- Life skills
- Mental health services
- Substance use treatment services
- Transportation
- Services for special populations



Emergency Shelter

Case Management

- Assessing, arranging, coordinating, monitoring individualized services.

Eligible costs

- Using the coordinated entry system
- Initial evaluation including verifying and documenting eligibility
- Counseling
- Developing, securing, and coordinating services including federal, state, and local benefits
- 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
- Developing an individualized housing and service plan



Emergency Shelter

Child Care

- Licensed child care for program participants with children under the age of 13, or disabled children under the age of 18.

Eligible Costs

- Child care costs
- Meals and snacks
- Comprehensive and coordinated sets of appropriate developmental activities



Emergency Shelter

Education Services

- Instruction or training to enhance participants' ability to obtain and maintain housing, literacy, English literacy, GED, consumer education, health education, and substance use prevention.

Eligible costs

- Educational services/skill-building
- Screening, assessment, and testing
- Individual or group instruction
- Tutoring
- Provision of books, supplies, and instructional material
- Counseling
- Referral to community resources



Emergency Shelter

Employment Assistance and Job Training

- Services to assist participants in securing employment and job training programs.

Eligible costs

- Classroom, online, and/or computer instruction
- On-the-job instruction
- Job finding, skill-building
- Reasonable stipends in employment assistance and job training programs
- Books and instructional material
- Employment screening, assessment or testing
- Structured job seeking support
- Special training and tutoring, including training and pre-vocational training
- Counseling or job coaching
- Referral to community resources



Emergency Shelter

Outpatient Health Services

- Direct outpatient treatment of medical conditions provided by licensed medical professionals.

Eligible Costs

- Assessing health problems and developing a treatment plan
- Assisting program participants to understand their health needs
- Providing or helping participants obtain appropriate medical treatment, preventative medical care, and health maintenance services, including emergency medical services
- Providing medication and follow-up services
- Providing preventative and non-cosmetic dental care



Emergency Shelter

Legal Services

- Necessary legal services regarding matters that interfere with the program participant's ability to obtain and retain housing.

Eligible Costs

- Hourly fees for legal advice and representation by licensed attorneys and certain other fees-for-service
- Client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling
- Filing fees and other necessary court costs



Emergency Shelter

Legal Services, cont.

- Legal representation and advice to resolve legal problems that prevent participants from obtaining or retaining permanent housing:
 - Child support
 - Guardianship
 - Paternity
 - Emancipation
 - Legal separation
 - Resolution of outstanding criminal warrants
 - Appeal of veterans and public benefit claim denials
 - Orders of protection and other civil remedies for victims of DV, dating violence, sexual assault, and stalking



Emergency Shelter

Life Skills Training

- Critical life management skills necessary to assist the program participant to function independently in the community.

Eligible Costs

- Budgeting resources
- Managing money
- Managing a household
- Resolving conflict
- Shopping for food and needed items
- Improving nutrition
- Using public transportation
- Parenting



Emergency Shelter

Mental Health Services

- Direct outpatient treatment of mental health conditions by licensed professionals.

Eligible Costs

- Crisis interventions
- Individual, family, or group therapy sessions
- Prescription of psychotropic medications or explanations about the use or management of medications
- Combinations of therapeutic approaches to address multiple problems



Emergency Shelter

Substance Abuse Treatment Services

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

Eligible Costs

- Client intake and assessment
- Outpatient treatment for up to thirty days
- Group and individual counseling
- Drug testing



Emergency Shelter

Transportation

- Costs of travel by program participants to and from medical care, employment, child care, or other facilities that provide eligible essential services; and costs of staff travel to support provision of essential services.

Eligible Costs

- Cost of program participant's travel on public transportation
- Mileage allowance for service workers to visit participants
- Purchasing or leasing a vehicle used for transport of participants and/or staff serving participants, including the cost of gas, insurance, taxes, and maintenance for the vehicle



Emergency Shelter

Services for Special Populations

- Otherwise eligible essential services tailored to address the special needs of homeless youth, victims of domestic violence and related crimes/threats, and people living with HIV/AIDS in emergency shelters

Eligible costs

- Case management
- Child care
- Education services
- Employment assistance and job training
- Outpatient health services
- Legal services
- Life skills training
- Mental health services
- Substance abuse treatment services
- Transportation



Knowledge Check

Costs for books, supplies and other educational material are allowed under ESG.

True

False



Knowledge Check

Preventative dental care is allowed by ESG.

True

False



Emergency Shelter

Rehabilitation and Renovation

- Renovating buildings to be used as emergency shelter for families and individuals experiencing homelessness.

Eligible Costs

- Labor
- Materials
- Tools
- Other costs for renovation, including soft costs
- Major rehabilitation of an emergency shelter
- Conversion of a building into an emergency shelter



Emergency Shelter

Rehabilitation and Renovation Minimum Period of Use

| | Use Requirement | Building Valuation |
|-----------------------------|------------------|---|
| Major Rehabilitation | 10 years* | If rehab costs exceed 75% of the value of the building before rehab |
| Conversion | 10 years* | If rehab costs exceed 75% of the value of the building after rehab |
| Other Renovation | 3 years | If rehab costs are 75% or less of the value of the building before rehab |

*Recorded deed or use restriction required



Emergency Shelter

Shelter Operations

- Costs to operate and maintain emergency shelters and also provide other emergency lodging when appropriate

Eligible costs

- Maintenance (including minor or routine repairs)
- Rent
- Security
- Fuel
- Insurance
- Utilities
- Food
- Furnishings
- Equipment
- Supplies necessary for the operation of the emergency shelter
- Hotel or motel vouchers for family or individual (only eligible when no appropriate emergency shelter is available)



Emergency Shelter

Assistance Required Under URA

- Assistance required under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA) as described in subpart E of the interim regulations.

Eligible Costs

- Costs of providing URA assistance under §576.408, including relocation payments and other assistance to persons displaced by a project assisted with ESG funds
- Persons that receive URA assistance are not considered ‘program participants’ for the purposes of this part of the ESG, and relocation payments and other URA assistance are not considered ‘rental assistance’ or ‘housing relocation and stabilization services’ for the purposes of this part under ESG.



Knowledge Check

There are no restrictions on the use of a building used for shelter if rehab costs are less than 75% of the building's value before the rehab.

True

False



Street Outreach and Emergency Shelter



Maintenance of Effort

Recipients and subrecipients that are units of general purpose local government cannot use their ESG funds to replace funds the local government provided for street outreach or emergency shelter services during the immediately preceding 12-month period unless HUD determines the local government is in a severe financial deficit.



Minimum Use Period

- **Street Outreach:** Services must be provided for at least the period of time for which ESG funds are committed for this purpose.
- **Emergency Shelter:** Where ESG funds are used solely for essential services or shelter operations, services or shelter must be provided to individuals and families experiencing homelessness at least for the period during which the ESG funds are provided.
- **Example:** If the recipient commits to providing street outreach for an entire year, or if the recipient contracts with a subrecipient to provide street outreach services for an entire year, the specified street outreach services must be provided for the entire one-year period.



Knowledge Check

ESG funds can be used for hotel / motel costs if no appropriate Emergency Shelter is available.

True

False



Break

Please return at 10:25am.



Rapid Re-housing and Homelessness Prevention



Eligibility for ESG Program Components

| | Category 1: Literally Homeless | Category 2: Imminent risk of Homelessness | Category 3: Homeless Under Other Federal Statutes | Category 4: Fleeing/ Attempting to Flee DV | At-risk of Homelessness |
|----------------------------|--------------------------------------|--|---|---|----------------------------|
| Street Outreach | X | | | X | |
| Emergency Shelter | X | | X | X | |
| Rapid Re- housing | X | | | X | |
| Homelessness Prevention | | X | X | X | X |



Rapid Re-Housing and Homelessness Prevention

- Overview of Eligible Activities
 - Short- and medium-term rental assistance
 - Housing relocation and stabilization services
 - Staff salaries related to carrying out rapid re-housing and homelessness prevention activities
 - Participants access RRH and HP through Coordinated Entry



Rapid Re-Housing

Eligible Program Participants

- **Rapid Re-Housing:** Individuals and families who are *literally homeless*
 - Category 1: Literally Homeless
 - Category 4: Fleeing/Attempting to flee domestic violence
- Initial eligibility does not depend on income, only on housing status
- At annual re-evaluation for continued RRH rental assistance, income must be at or below 30% Area Median Income (AMI)

Program Purposes

- To help unhoused persons living on the streets or in an emergency shelter transition as quickly as possible into permanent housing, and then
- To help such persons achieve stability in that housing



Homelessness Prevention

Eligible Program Participants

- Households that are ***at imminent risk, or at-risk, of homelessness***:
 - Category 2 – Imminent Risk of Homelessness
 - Category 3 – Homeless under other Federal Statutes
 - Category 4 – Fleeing/Attempting to Flee Domestic Violence
 - At-Risk of Homelessness

Program Purposes

- To **prevent** persons who are housed from becoming homeless
- To help such persons **regain stability** in their current housing or other permanent housing



Homelessness Prevention

- Income **does** figure into eligibility for homelessness prevention
- A household's annual income must be below 30% AMI at initial evaluation AND they must "lack the resources or support networks to help them retain or obtain other appropriate housing"
- **Reassessment** is required every 3 months.
 - Household must continue to have annual income at or below 30% AMI AND lack the resources or support to retain or obtain other appropriate housing



Rapid Re-housing and Homelessness Prevention

Program Requirements

- Maximum length of rental assistance is 24 months during any 3-year period
- Payment of **rental and/or utility arrears** consists of a one-time payment for up to 6 months of arrears, including any late fees on those arrears.
- The 24-month limit includes any arrears, e.g., if the household receives 6 months of arrears payments, they can only receive up to 18 months of future assistance.



Rapid Re-housing and Homelessness Prevention

Program Requirements

- Case managers must:
 - Meet with program participants at least monthly to ensure long-term housing stability
 - Work with participants to develop a plan for maintaining permanent housing after ESG assistance has ended



Knowledge Check

Which of these living situations makes a participant eligible for Rapid Re-housing?

1. Living in an overcrowded apartment
2. Staying in a friend's car
3. About to be released from hospital after 3 weeks of COVID-19 treatment
4. Couch-surfing among relatives' homes



Knowledge Check

Which of these living situations *may* make a participant eligible for Homelessness Prevention?

1. Living in an overcrowded apartment
2. Staying in a friend's car
3. About to be released from hospital after 3 weeks of COVID-19 treatment
4. Couch-surfing among relatives' homes



Housing Relocation and Stabilization Services

Financial Assistance

- Moving Costs
- Rent Application Fees
- Security Deposit
- Last Month's Rent
- Utility Deposit
- Utility Payments

Services

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

*Services can continue for 24 months



Housing Relocation and Stabilization Services: Financial Assistance

| | |
|--------------------------------|---|
| Rental Application Fees | Application fee that is charged by the owner to all applicants |
| Security Deposits | Equal to no more than 2 month's rent |
| Last Month's Rent | Paid to the owner of housing at the time security deposit and first month's rent are paid |
| Moving Costs | Moving costs, such as truck rental or hiring a moving company, including certain temporary storage fees |
| Utility Deposits | Standard utility deposit required by the utility company for all customers |
| Utility Payments | Up to 24 months of utility payments per participant, per service (e.g. gas, electric, water/sewage), including up to 6 months of arrearages, per service. |



Housing Relocation and Stabilization Services AND Short- and Medium-Term Rental Assistance

Maximum Period of Use

- The total period for which any program participant may receive the services must not exceed 24 months during any 3-year period.

Discretion to Set Cap

- The Recipient may set a maximum dollar amount and maximum period for which a program participant may receive any of the types of assistance or services described within the regulatory maximums – these caps must appear in Written Standards and be applied equally by all ESG-funded programs



Knowledge Check

ESG funds can be used only for future rent and utility payments.

True

False



Rental Assistance Requirements



Rental Assistance Documentation for Rapid Re-housing and Homelessness Prevention

Unit Eligibility:

- ü Habitability Inspection Report
- ü Rent is at/under Fair Market Rent
- ü Rent reasonableness (comparable units)

Rental Documents:

- ✓ Signed lease
- ✓ Rental Assistance Agreement (Agency, Landlord, Tenant)
- ✓ Proof of Ownership
- ✓ Landlord W-9
- ✓ Lead compliance certificate



Homelessness Prevention and Rapid Re-Housing

Short- and Medium-Term Rental Assistance

- Compliance with Habitability Standards
- Compliance with Fair Market Rent (FMR)
 - Assisted units must be at or below FMR for area and unit size for rent + utilities
 - FMRs can be found at:
<http://www.huduser.org/portal/datasets/fmr.html>
- Rent reasonableness
 - Documentation that unit rent is reasonable in relation to comparable units
 - Documented with data on file for comparable units (size, location, rent amounts)



Homelessness Prevention and Rapid Re-Housing

Short- and Medium-Term Rental Assistance

- Written Lease and Rental Assistance Agreement
 - Each participant receiving rental assistance must have a legally binding, written lease (between the owner and participant) for the rental unit, unless the assistance is solely for rental arrears
 - ESG also requires a 3-way rental assistance agreement that sets forth the terms under which rental assistance will be provided.
 - Project-based rental assistance leases must have an initial term of one year.



Homelessness Prevention and Rapid Re-Housing

Short- and Medium-Term Rental Assistance

Also need to include in Case file:

- Proof of Ownership
- Landlord W-9
- Lead compliance certificate



Homelessness Prevention and Rapid Re-Housing

Short- and Medium-Term Rental Assistance

- Cannot use with other subsidies:
 - No rental assistance can be provided to a household receiving rental assistance from another public source for same time period (except 6 months of arrears)
 - *Example:* Persons living in public housing units, using housing choice vouchers, or residing in project based assisted units *cannot* receive ongoing monthly rental assistance under ESG.
 - Rental assistance may not be provided to participants who are currently receiving replacement housing payments under the URA (Uniform Relocation Assistance)



Homelessness Prevention and Rapid Re-Housing

Short- and Medium-Term Rental Assistance

- Late payments
 - The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease.
 - The recipient or subrecipient must make timely payments to owners in accordance with the rental assistance agreement.
 - The recipient or subrecipient is solely responsible for paying (with non-ESG funds) late payment penalties that it incurs.



Knowledge Check

If rent can be shown to be “reasonable” in comparison with rents for similar units in the community, the ESG program can provide rental assistance.

True

False



Homeless Eligibility Requirements



Determining Eligibility

- Determining eligibility means gathering information to establish that:
 - The *client household* is eligible for the assistance
 - The *housing* which is being paid for is safe and adequate, and
 - The *costs* involved in providing the assistance are reasonable.



Why does eligibility documentation matter?

- Documenting eligibility establishes the adequacy and legitimacy of the assistance
- Documenting eligibility ensures that funds will flow without challenge (or repayment)



Homeless Definition Categories

- Category 1: Literally Homeless
- Category 2: Imminent Risk of Homelessness
- Category 3: Homeless Under Other Federal Statutes
 - HUD has not authorized any CoC to use funds to serve individuals/families in this category.
- Category 4: Fleeing or Attempting to Flee Domestic Violence
- At-Risk of Homelessness



Eligibility for ESG Program Components

| | Category 1: Literally Homeless | Category 2: Imminent risk of Homelessness | Category 3: Homeless Under Other Federal Statutes | Category 4: Fleeing/ Attempting to Flee DV | At-risk of Homelessness |
|----------------------------|--------------------------------------|--|---|---|----------------------------|
| Street Outreach | X | | | X | |
| Emergency Shelter | X | | X | X | |
| Rapid Re- housing | X | | | X | |
| Homelessness Prevention | | X | X | X | X |



Eligibility for ESG Activities

Street Outreach and Emergency Shelter:

- Household must meet Category 1 criteria (literally homeless) or Category 4 (fleeing/attempting to flee DV)

Rapid Rehousing and Homeless Prevention:

- **RRH:** Household must meet criteria in Categories 1 or 4
- **HP:** Household must meet criteria in Categories 2 or 4 or At-Risk



Category 1: Literally Homeless

An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning they:

- Have a primary nighttime residence that is a public or private place not meant for human habitation;
- Are living in a 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 and local government programs); or
- Are exiting an institution where they have resided for 90 days or less and resided in an emergency shelter or place not meant for human habitation immediately before entering that institution



Category 2: Imminent Risk of Homelessness

Household will imminently lose their primary nighttime residence, provided that:

- Residence will be lost within 14 days of the date of application for homeless assistance;
- No subsequent residence has been identified;
- The individual or family lacks the resources or support networks needed to obtain other permanent housing



Category 4: Fleeing or Attempting to Flee DV

Any individual or family who:

- 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 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 residence;
- Has no other residence; and
- Lacks the resources or support networks to obtain other permanent housing



At-Risk of Homelessness

Individual or family with annual income below 30% Area Median Income who:

- Lacks sufficient resources or a support network immediately available to *prevent* them from moving to a place:
 - not meant for human habitation or
 - emergency shelter, or
 - is exiting an institution after 90 days and met one of the above conditions immediately before entering that institution

AND who meets one of the following:



At-Risk of Homelessness

- Has moved because of economic reasons two or more times during the past 60 days; or
- Is living in the home of another because of economic hardship; or
- Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; or
- Lives in a hotel or motel and the cost is paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; or
- 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 per room, as defined by the U.S. Census Bureau; or
- Is exiting a publicly funded institution or system of care; or
- Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the consolidated plan



Knowledge Check

“Literally homeless” households are eligible for Homelessness Prevention rental assistance and services.

True

False



Knowledge Check

A person or family living in overcrowded conditions is eligible for Homelessness Prevention assistance under Category 4.

True

False



Eligibility for ESG Program Components

| | Category 1: Literally Homeless | Category 2: Imminent risk of Homelessness | Category 3: Homeless Under Other Federal Statutes | Category 4: Fleeing/ Attempting to Flee DV | At-risk of Homelessness |
|----------------------------|--------------------------------------|--|---|---|----------------------------|
| Street Outreach | X | | | X | |
| Emergency Shelter | X | | X | X | |
| Rapid Re- housing | X | | | X | |
| Homelessness Prevention | | X | X | X | X |



Income Eligibility at the Start

Remember, at the time of initial intake:

- Literally homeless households are assisted with Rapid Re-housing without regard to their income
- Households receiving assistance through Homelessness Prevention must be at imminent risk of homelessness or have annual income below 30% of Area Median Income (AMI)
- HUD AMI Lookup Tool:
<https://www.huduser.gov/portal/datasets/il.html#2022>



Re-Evaluation

Households assisted with Rapid Re-housing must be re-evaluated for continued eligibility at 12 months

- ✓ Their income must be at or below 30% of AMI to continue to receive rental assistance

Households assisted with Homeless Prevention must be re-evaluated for continued eligibility every 3 months

- ✓ Their income must still be at or below 30% of AMI to continue to receive rental assistance



Eligibility and Annual Income

| | Rapid Re-housing | Homelessness Prevention |
|-------------------------------------|-------------------------|--------------------------------|
| Income at initial evaluation | N/A | Below 30% AMI |
| Income at re-evaluation | At or below 30% AMI | At or below 30% AMI |
| Schedule for re-evaluation | At least annually | Every 3 months |



Morning Recap

- ESG Program Overview – General Program Requirements
- ESG Eligible Activities
- Rental Assistance Requirements
- Homeless Eligibility Determination



Afternoon Preview

- HUD Preferred Order of Documentation and Documenting Eligibility
- Importance of Documentation
- HMIS
- Performance Measures and Reporting
- Resources, Q&A, and Next Steps



Lunch Break

Please return at 12:15pm.



Afternoon Preview

- HUD Preferred Order of Documentation and Documenting Eligibility
- Importance of Documentation
- HMIS
- Performance Measures and Reporting
- Resources, Q&A, and Next Steps



Preferred Order of Documentation



HUD's Preferred Order of Documentation

1. Third-Party Documentation
 - Third-Party Source
 - Third-Party Written
 - Third-Party Oral
2. Intake Worker Observations
3. Self-Certifications



Exceptions to Preferred Order of Documentation

- HUD does not require these providers to obtain third-party documentation:
 - Emergency Shelter
 - Street Outreach
 - Fleeing or Attempting to Flee Domestic Violence
- Lack of third-party documentation should not prevent someone from receiving these services.



Due Diligence Standards

- Must make a reasonable effort to obtain documentation according to HUD's preferred order of documentation (the highest level possible)
- Documentation of due diligence must include:
 - Description of efforts to obtain third-party documentation (e.g., dates, times, supporting documentation)
 - Description of outcome, including reasons why third-party documentation could not be obtained
 - Certification that is signed and dated by the intake worker affirming that the information is true and complete



Third-Party Documentation

- General requirements
 - Issued on third-party letterhead (exception for a letter from a host family/friend), come from an agency email address, or be a statement, receipt, form, or HMIS record
 - Signed and dated by third party



Third-Party Documentation

- Third-Party Source
 - Pre-exist and are provided directly to intake staff from a third party or from the potential program participant
 - Examples:
 - Discharge paperwork from an institution
 - HMIS record
 - Court-ordered eviction notice
 - Must include dates the individual/family resided in or was served by the program



Third-Party Documentation

- Third-Party Written
 - Must demonstrate that it came from an appropriate party
 - Examples
 - Letters from host family saying individual/family can no longer stay with them
 - Written referrals from housing or service providers, law enforcement, or emergency services (email acceptable if it comes from organization's email account)



Third-Party Documentation

- Third-Party Oral
 - Verification from a relevant third-party that is provided orally by phone or in person to intake staff
- Staff must:
 - Identify the staff member recording the oral statement
 - Record oral statement in writing
 - Certify that the recorded statement is true and complete
 - Sign and date the statement



Knowledge Check

An HMIS record of shelter stay has the same weight as written, signed, and dated verification on shelter letterhead.

True

False



Intake Worker Observations

- Can include observations on intake assessment forms, in case file notes, or on intake worker observation forms developed for the project
- Must:
 - Identify intake worker making the observations
 - Certify the observation is true and complete and is signed and dated by the intake worker



Self-Certification

- Written certification from the individual or head of household seeking assistance or oral certification provided by participant, recorded in writing by the intake worker, and signed and dated by the participant
- Must:
 - Identify the individual or head of household providing self-certification
 - Be signed and dated by the individual or head of household



Self-Certification of Homelessness/Chronic Homelessness

Applicant Name (Head of Household): _____ HMIS ID #: _____
Gender _____ Date of Birth: _____ Individual Family

| Household Member Name | Relationship to the Head of Household |
|-----------------------|---------------------------------------|
| | |
| | |
| | |
| | |

Additional names attached

Literally Homeless

I certify that I and any family members listed are homeless as indicated below and have no appropriate housing options available and lack the financial resources and support networks needed to obtain immediate housing.

Living on the street (i.e. a car, park, abandoned building, bus station, airport, or camp ground).
Describe location: _____

Living in a publically or privately operated shelter designated to provide temporary living arrangements.
Name of Organization or Facility: _____ Contact: _____
Describe location: _____

Living in a hotel/motel paid for by a charitable organization or government program.
Name of Organization or Facility: _____ Contact: _____

Recently exited an institution where I/we resided for 90 days or less and prior to admission to an emergency shelter or place not meant for human.
Facility Type: Hospital Mental Health/Substance Abuse Treatment Facility
Name of Facility: _____
Date Entered: _____ Date Exited: _____
Place residing prior to entry: _____

Signature: _____ Date: _____

Print Name: _____

Duration of Homelessness (Chronically Homeless)

I certify, as indicated below, I have been homeless for at least 1 year without spending any time in transitional permanent housing or experienced homelessness 4 separate times in the last three years.

| Time Period Beginning | Time Period Ending | # Days | Location of Stay |
|-----------------------|--------------------|--------|------------------|
| | | | |
| | | | |
| | | | |
| | | | |

Signature: _____ Date: _____

Print Name: _____

Imminent Risk of Homelessness

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Knowledge Check

Third-party oral statements recorded by case managers must be certified as true and complete by case managers.

True

False



HUD's Preferred Order of Documentation

1. Third-Party Documentation
 - Third-Party Source
 - Third-Party Written
 - Third-Party Oral
2. Intake Worker Observations
3. Self-Certifications



Documentation Standards by Category



Category 1: Literally Homeless Documentation

- HUD's preferred order of documentation applies
 - Third-Party
 - Examples: HMIS street outreach service record, homeless certification/written referral from local law enforcement or emergency medical service agencies
 - Intake Worker Observation
 - Self-certification



Category 1: Literally Homeless Documentation, cont.

- For those exiting an institution where they resided for 90 days or less, one of the forms of evidence above, AND one of the following:
 - Discharge paperwork or a written or oral referral
 - A written record of the intake worker's due diligence in attempting to obtain the evidence and a certification by the individual seeking assistance that states they are exiting or have just exited an institution



Category 2: Imminent Risk of Homelessness Documentation

- A court order resulting from an eviction action notifying the household that they must leave; OR the equivalent under state law OR
- For households leaving a hotel or motel – evidence that they lack the financial resources to stay; OR
- A documented and verified oral statement; AND



Category 2: Imminent Risk of Homelessness Documentation

AND:

- Certification that no subsequent residence has been identified; AND
- Self-certification or other written documentation that the household lacks the financial resources and support necessary to obtain permanent housing



Category 4: Fleeing or Attempting to Flee DV

For Victim Service Providers:

- An oral statement by the individual or head of household seeking assistance which states:
 - they are fleeing;
 - they have no subsequent residence; and
 - they lack resources.
- Statement must be documented by a signed self-certification or a signed certification by the intake worker.



Category 4: Fleeing or Attempting to Flee DV

For Non-Victim Service Providers:

- Oral statement by the individual or head of household seeking assistance that they are fleeing. *This statement is documented by a self-certification or by the caseworker. Where safety is not jeopardized, the oral statement must be verified; AND*
- Certification by the individual or head of household that no subsequent residence has been identified; AND
- Self-certification, or other written documentation, that the household lacks the financial resources and support to obtain other permanent housing.



Documenting At-Risk of Homelessness

A - Documentation that annual income is below 30% Area Median Income AND

B - Self-certification that household lacks resources or support networks immediately available to attain housing stability and meets one or more of the "At-Risk" conditions AND

C - Most reliable evidence available to confirm items in B, above AND

D - Most reliable evidence available to show that the household meets At-Risk Criteria



How to Demonstrate Meeting the At-Risk Criteria?

HUD's examples include:

- Documentation of number/dates of multiple moves
- 21-day notice from court
- Documentation of where the participant last stayed (e.g., hotel/motel, institution)
- Documentation of characteristics associated with housing instability and increased risk of homelessness



Knowledge Check

For those exiting an institution (e.g., hospital, jail, substance abuse treatment program), formal discharge paperwork is the only way to establish eligibility under Category 1.

True

False



Knowledge Check

Only victim service providers can issue written certification of flight or attempt to flee domestic violence.

True

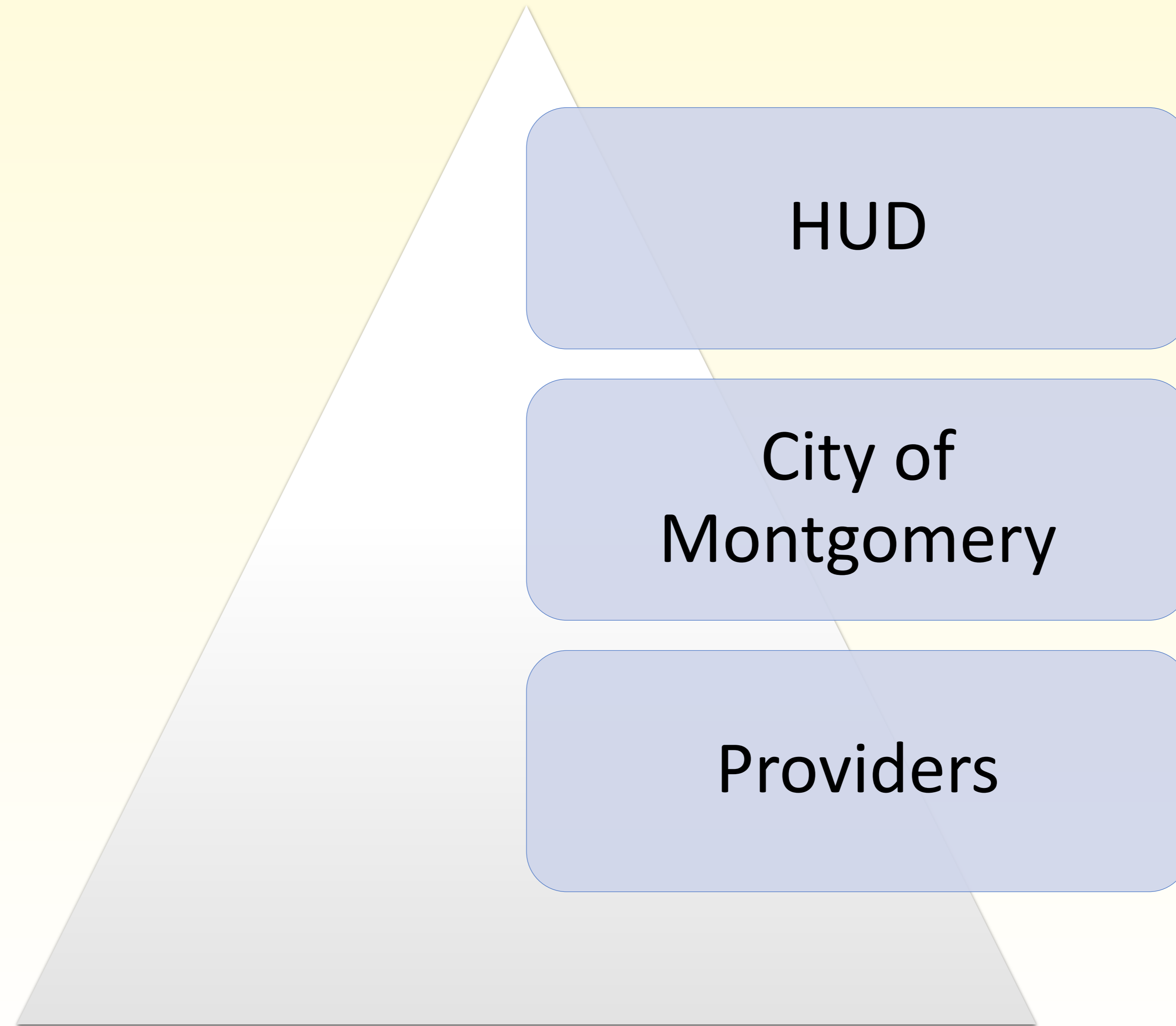
False



Importance of Documentation



ESG Funds Travel Across Several Levels



Funds are Awarded in Different Ways

HUD

ESG funds are allocated to
Montgomery by HUD
formula

Providers' funds are
awarded competitively via
City-issued RFP



Federal Funds: Serious Recordkeeping Requirements

- Recipients (the City) are responsible for oversight their subrecipients
 - The City reviews case files and agency procedures to document provider compliance to HUD - (“monitoring”)
- Sometimes the City will need to impose a “corrective action plan”
- In rare cases, subrecipients that don’t address deficiencies must repay funds (from non-federal sources)



Successful Strategies for Funded Agencies

- **Invest in training**
 - Ensure that administrative and financial staff understand the program and its reporting/invoicing requirements
 - Keep abreast of new rules and requirements (www.hudexchange.info)
- **Staff up appropriately**
 - Have enough staff in admin/fiscal/data-entry roles to ensure accurate, timely submissions including accurate reporting
 - Undertake frequent reconciliations
- **Work in partnership with the City**
 - Raise questions and concerns as soon as they arise so you can clear them up
 - Seek out/ask for training and technical assistance for program and admin/fiscal staff



Break

Please return at 2:00pm.



Homeless Management Information System (HMIS)



What is a Homeless Management Information System?

A Homeless Management Information System (HMIS) is:

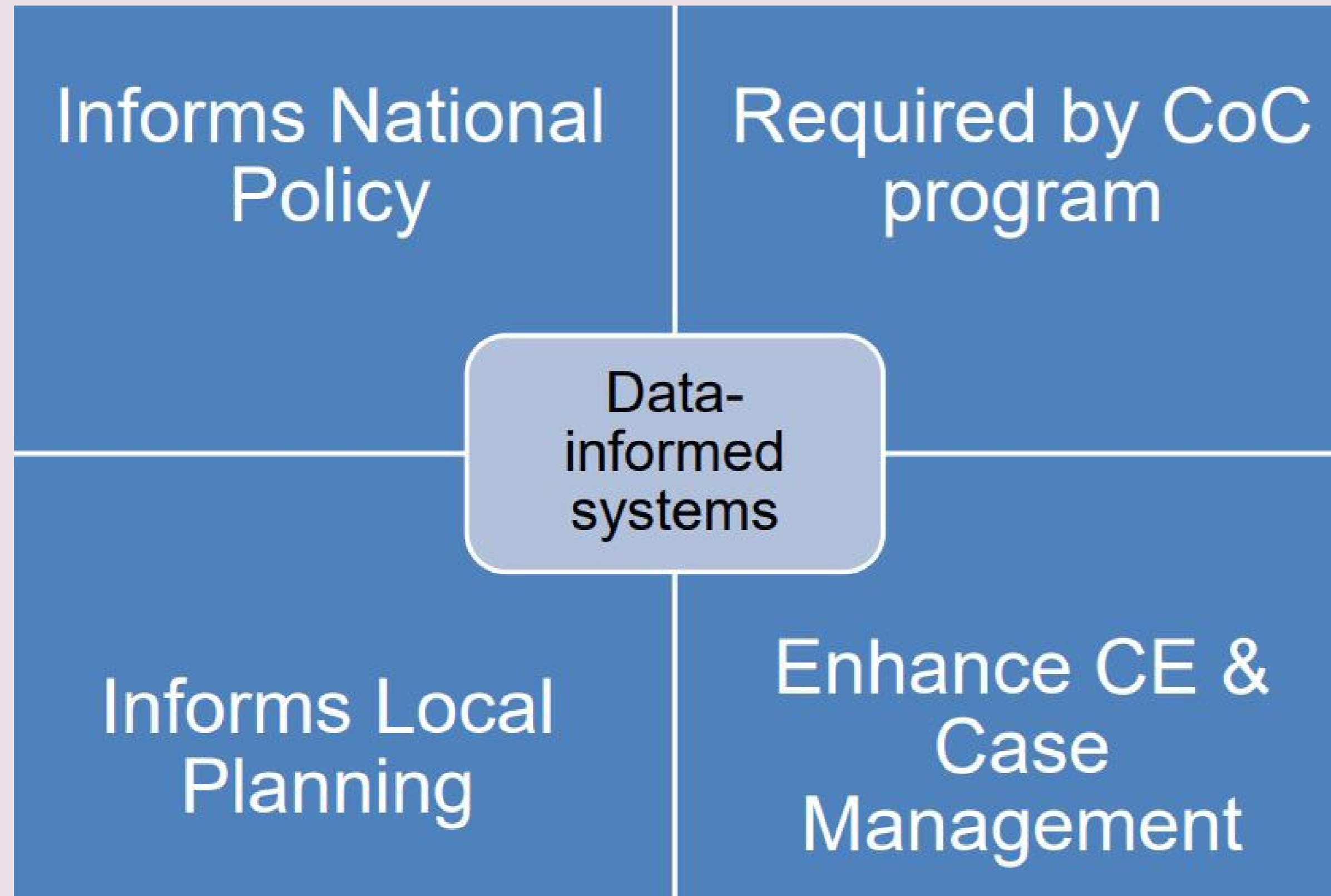
- Locally administered
- An electronic data collection and reporting system
- Used to store longitudinal person-level information about people who access the homeless service system.



Matthews, N. & Reinauer, S. (2019). *Understanding the Interconnectedness of HMIS Data*. <https://nhsdc.org/wp-content/uploads/2019/05/3.1.B-Understanding-the-Interconnectedness-of-HMIS-Data.pdf>



Why is HMIS Important?



Matthews, N. & Reinauer, S. (2019). *Understanding the Interconnectedness of HMIS Data*. <https://nhsdc.org/wp-content/uploads/2019/05/3.1.B-Understanding-the-Interconnectedness-of-HMIS-Data.pdf>



Why is HMIS Important?

- **Communities** can use HMIS data to:
 - Understand the number and characteristics of people served by the homeless service system
 - Analyze patterns of use
 - Evaluate the effectiveness of services and the system as a whole
 - Identify service gaps
 - Measure client outcomes
 - Coordinate services
 - Make ongoing system performance improvements
 - Determine optimal resource allocation
 - Contribute to statewide and federal planning efforts



Matthews, N. & Reinauer, S. (2019). *Understanding the Interconnectedness of HMIS Data*. <https://nhsdc.org/wp-content/uploads/2019/05/3.1.B-Understanding-the-Interconnectedness-of-HMIS-Data.pdf>



Why is HMIS Important?

- HMIS benefits **clients** by:
 - Helping to determine their eligibility for benefits
 - Providing streamlined referrals
 - Providing coordinated case management
 - Decreasing the number of duplicative intakes and assessments that they have to complete
 - Improving the effectiveness of the community's homeless service system



Matthews, N. & Reinauer, S. (2019). *Understanding the Interconnectedness of HMIS Data*. <https://nhsdc.org/wp-content/uploads/2019/05/3.1.B-Understanding-the-Interconnectedness-of-HMIS-Data.pdf>



HMIS Data Quality

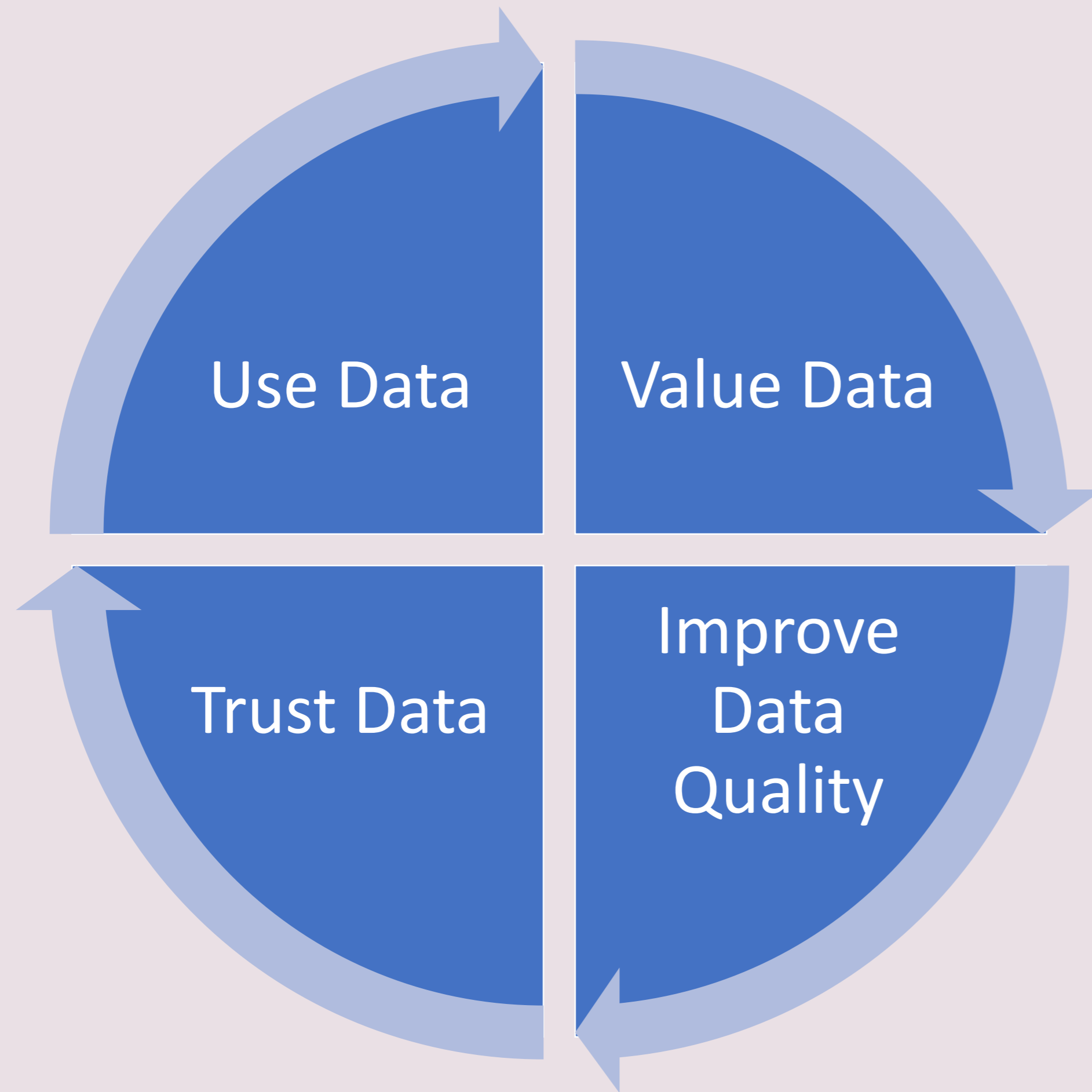
- Quality HMIS data is:
 - Timely
 - Accurate
 - Comprehensive
- Review data regularly to identify any inaccuracies.
- Share data reports across providers.
- Data quality impacts the usefulness of the data.
- Everyone plays a role in ensuring data quality.



Matthews, N. & Reinauer, S. (2019). *Understanding the Interconnectedness of HMIS Data*. <https://nhsdc.org/wp-content/uploads/2019/05/3.1.B-Understanding-the-Interconnectedness-of-HMIS-Data.pdf>



HMIS Data Quality



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Performance Measures and Reporting



Performance Measurement

Performance measurement has been defined as "regular measurement of outcomes and results, which generates reliable data on the effectiveness and efficiency of programs."

Performance measurement requires an ESG-funded agency to:

- set objectives that it will strive to achieve during the contract period, and then to
- regularly report on the progress it is making toward hitting those target(s).



Performance Measurement in Montgomery's ESG Program

Each ESG-funded program or project is formalized in a **Subrecipient Agreement** executed between the City and the agency.

Parts of this document are developed by the applicant agency and submitted to the City as a key element of its request for ESG funds. Included in the initial proposal are:

Goals

- Identifying the population to be served and
- The nature of housing/services to be provided

Objectives

- Targets for specific forms of support and
- Number of households to be served



Performance Measurement in Montgomery's ESG Program

The Agreement includes Section 1.C, Goals and Performance Measures. A simple example might be:

| Goal | Objectives |
|---|--|
| To provide safe and decent protective shelter for families | During the project period, safe and decent shelter in a compliant facility will be provided for 50 families |
| | During the project period, food, benefits advocacy, referral to Coordinated Entry, and other needed supportive services will be provided for 50 families |



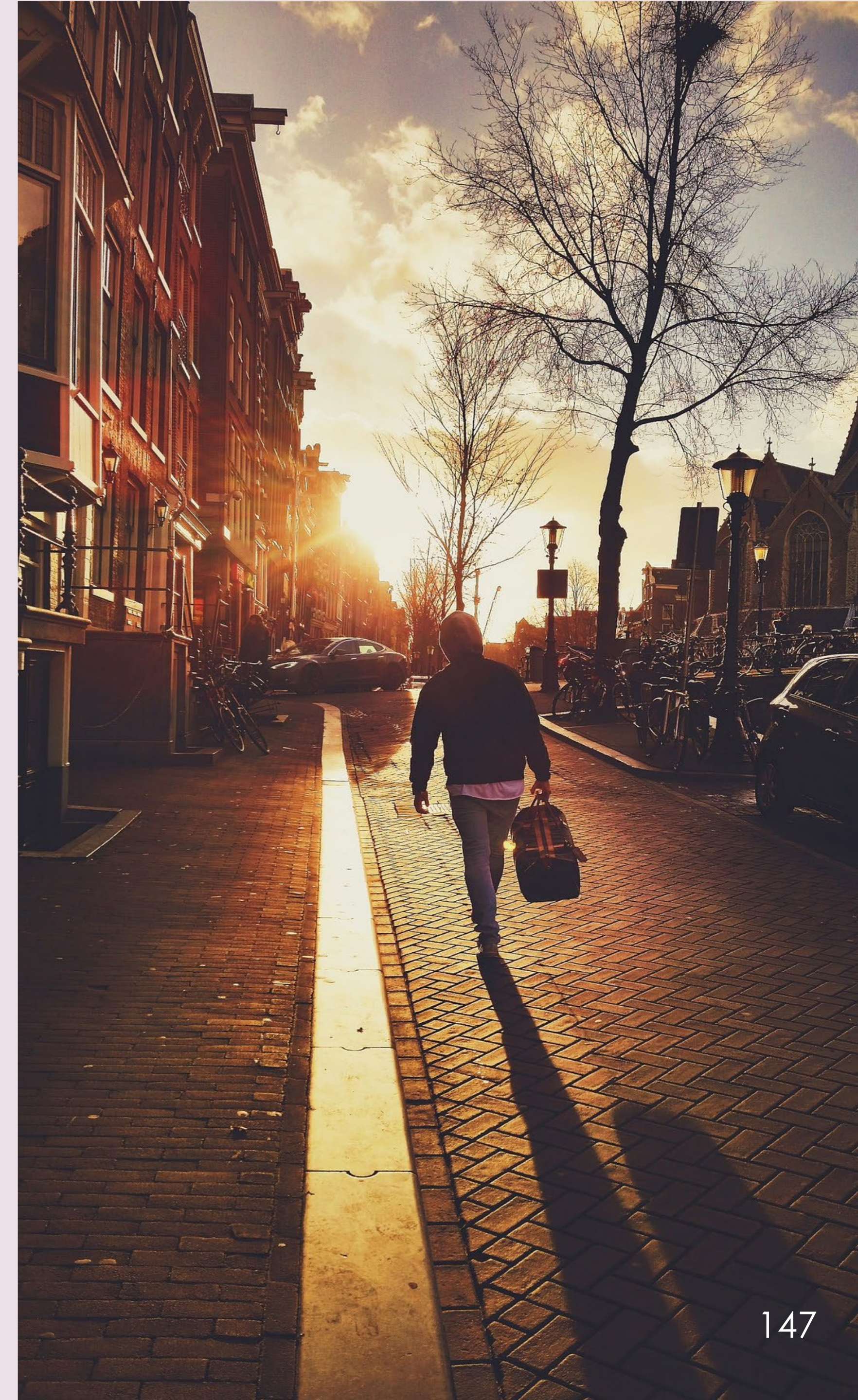
Performance Measurement as Part of the City's Oversight and Monitoring

Section 1.E, Performance Monitoring, reads in full:

"The CITY will monitor the performance of the SUBRECIPIENT against goals and objectives as stated above.

Substandard performance as determined by the CITY will constitute noncompliance with this Agreement.

If action to correct such substandard performance is not taken by the SUBRECIPIENT within a reasonable period of time after being notified by the CITY, suspension or termination procedures will be initiated."



Program Reporting includes Performance Measurement

SECTION 4: PROGRAM REPORTING

The SUBRECIPIENT shall submit project progress reports as required by the CITY to meet its local obligations and its obligations to HUD. The CITY will prescribe the report format, as well as the time and location for submission of such reports. Monthly reports include:

- a. Budget – Amount Budgeted and Amount Spent to Date
- b. Goals and Objectives Progress
- c. Equipment Purchases
- d. Changes in Organizational Personnel
- e. Beneficiary Information
- f. Project Concerns
- g. Need for Technical Assistance
- h. Program Accomplishments



Program Reporting includes Performance Measurement

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- d. Changes in Organizational Personnel
- e. Beneficiary Information**
- f. Project Concerns
- g. Need for Technical Assistance
- h. Program Accomplishments



Program Reporting includes Data and HMIS Reports

- Client served report in HMIS allows your program to report on beneficiary information and may help track progress on goals and objectives.
- Beginning May 1, 2022, subrecipients will be required to submit a client served report as part of their monthly report.
- The City will share additional guidance about this new expectation.



Client Served Report

Reporting Group: AL504-Shelter beds ES and TH

Provider: null

[This provider AND its subordinates](#) [This provider ONLY](#)

Services: Services Provided (other than shelter or referred services)

Shelter Stays

Referrals Served by the Selected Provider(s)

Grouping: [Clients Receiving Services as a Family](#) [Clients in a Household](#)

Service Code:

Served Date Range: 1/1/2022 - 3/31/2022

Served Before Date Range (Old client count):

Treat Open-Ended Services/Referrals as 1-day Services: [Yes](#) [No](#)

Legal Adult Age: 18

Report Details

| CLIENTS SERVED | Old | New | Total |
|------------------------------------|----------|------------|------------|
| A. Adults | 0 | 225 | 225 |
| Male | 0 | 162 | 162 |
| Female | 0 | 59 | 59 |
| No Single Gender | 0 | 0 | 0 |
| Questioning | 0 | 0 | 0 |
| Transgender | 0 | 0 | 0 |
| Client Doesn't Know/Client Refused | 0 | 1 | 1 |
| Data Not Collected | 0 | 3 | 3 |
| B. Children | 0 | 28 | 28 |
| Male | 0 | 15 | 15 |
| Female | 0 | 13 | 13 |
| No Single Gender | 0 | 0 | 0 |
| Questioning | 0 | 0 | 0 |
| Transgender | 0 | 0 | 0 |
| Client Doesn't Know/Client Refused | 0 | 0 | 0 |
| Data Not Collected | 0 | 0 | 0 |



Invoicing Requirements

Before submitting an invoice, agencies must ensure the following:

- Signatures are included where required
- All required dates are included and accurate
- Any changes made are initialed
- All calculations are double-checked and accurate and agree across every part of the invoice
- Requested reimbursement amounts agree with the backup documentation
- Any receipts are affixed to an 8.5 x 11 sheet of paper for easy



processing

Resources, Q&A, and Next Steps



Review of Our Day

- ESG Program Overview – General Program Requirements
- ESG Eligible Activities
- Rental Assistance Requirements
- Homeless Eligibility Determination
- HUD Preferred Order of Documentation & Documenting Eligibility
- Importance of Documentation
- HMIS
- Performance Measures & Standards
- Resources, Q&A, and Next Steps



Resources

- **Code of Federal Regulations, Part 576 – Emergency Solutions Grants Program**
 - <https://www.govinfo.gov/content/pkg/CFR-2018-title24-vol3/xml/CFR-2018-title24-vol3-part576.xml#seqnum576.409>
- **HUD Exchange**
 - <https://www.hudexchange.info/>
- **HUD Ask A Question (AAQ)**
 - <https://www.hudexchange.info/program-support/>
- **HUD AMI Lookup Tool**
 - <https://www.huduser.gov/portal/datasets/il.html>



#2022



Q&A



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c4innovates.com