

# EMERGENCY SOLUTIONS GRANTS PROGRAM 2025

# **APPLICATION MANUAL**

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#### **OVERVIEW**

The Emergency Solutions Grants is a reimbursement grant that was designed to improve administrative efficiency and enhance response coordination and effectiveness in addressing the needs of homeless persons. The ESG program will provide funding to non-profits to assist individuals experiencing homelessness or persons at risk of homelessness to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.

#### **BACKGROUND**

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH ACT) consolidates three of the separate homeless assistance programs administered by the Department of Housing and Urban Development (HUD) under the McKinney-Vento Homeless Assistance Act into a single grant program, revised the Emergency Shelter Grants program (ESG) and renamed the program the Emergency Solutions Grants program (ESG). The HEARTH Act also codifies into law the Continuum of Care (CoC) planning process. The Continuum of Care program established by the HEARTH ACT and the new consultation requirements found in 24 CFR Part 91 states that ESG recipients consult with CoCs when allocating ESG funds to carry out eligible activities.

The change in the program's name, from Emergency Shelter Grants to Emergency Solutions Grants, reflects the change in the program's focus from addressing the needs of homeless people in emergency shelters to assisting people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.

The Department of Housing and Urban Development (HUD) allocates funds by formula grant to eligible states and units of general-purpose local government for the administration of the Emergency Solutions Grants (ESG) program. ESG funds will be distributed statewide to eligible local units of government that operate existing homeless shelters and private non-profit organizations that demonstrate the capacity to provide homelessness prevention and rapid rehousing assistance. Local units of government are not eligible to submit applications on behalf of non-profit agencies.

HUD provides general oversight of the regulatory guidance and directions the program should follow. This allows recipients to create their own rules required to implement a program if those rules do not violate the overall intent of the program. Mississippi Home Corporation has chosen to implement stricter regulations based on the funds allocated and the timeliness necessary for implementation of the program. **Organizations interested in applying for ESG funds must adhere to the directives that MHC has provided.** 

The Governor designated Mississippi Home Corporation ("MHC" or "Corporation") to administer the Emergency Solutions Grant in Mississippi, effective July 1<sup>st</sup>, 2015.

#### NATIONAL STRATEGIC GOALS/ PRIORITIES/ OBJECTIVES

HOME together is focused on federal strategies that will support states and communities to make homelessness a rare, brief, and one-time experience that will sustain that success once achieved. That focus is reflected in its structure.

Ensure
Homelessne
ss is a Rare
Experience

Objective 1.1: Collaboratively build lasting systems that end homelessness

- Build momentum behind a common vision
- Understand the size and scope of the problem
- Reduce fragmentation
- Drive cost-effective solutions
- Objective 1.2: Increase capacity and strengthen practices to prevent housing crises and homelessness
  - Reduces the prevalence of risk of housing crises
  - Reduce the risk of homelessness while households are engaged with or transitioning from systems
  - Target assistance to prevent housing crises

# Ensure Homelessne ss is a Brief Experience

Objective 2.1: Identify and engage all people experiencing homelessness as quickly as possible

- Identify every individual and family
- Coordinate comprehensive strategies
- Use HMIS and other data sources to build and maintain active lists of people experiencing homelessness
- Objective 2.2: Provide immediate access to low-barrier emergency shelter or other temporary accommodations to all who need it
  - Provide access to low-barrier emergency shelter
  - Provide access to service-enriched, long-term temporary accommodations when needed and appropriate
- Objective 2.3: Implement coordinated entry to standardize assessment and prioritization processes and streamline connections to housing and services
- Objective 2.4: Assist people in moving swiftly into permanent housing with appropriate and person-centered services
  - Expand access to new and existing affordable housing for people experiencing homelessness
  - Connect people to rapid re-housing
  - Connect people with the most intense needs to permanent supportive housing
  - Link people experiencing unsheltered homelessness to housing services

Ensure

Objective 3.1: Prevent Returns to Homelessness through Connections to

Homelessness is a One-Time Experience

# Adequate Services and Opportunities

Sustain an End to

Objective 4.1: Sustain Practices and Systems at a Scale Necessary to Respond to Future Needs

Homelessness

#### MHC's GOALS

Every five (5) years, Mississippi Home Corporation (MHC) creates a plan to address identified housing needs in the State. The goals and priorities are:

# Goal 1: HOME Rental Development. Expand and Preserve Affordable Rental Housing

- Increase the affordable housing stock to targeted populations.
- Prioritize developments that reserve units for households earning at or below 30% AMI or households that are homeless.
- Require developers to partner with approved nonprofits through a letter of commitment.
  - Letters of commitment must specify services that will be provided to the target population. For example, the partnering agency will provide transportation, case management, job training, employment readiness programs, and other approved supportive services activities.

**Measurement:** Number of affordable housing units developed, and the number of affordable housing units reserved for prioritized households.

# Goal 2 HOME, ESG & HOPWA. Link Housing Development with Employment & Supportive Services that promotes Self-Sufficiency

• Aligning new affordable housing projects with job hubs through mapping and strategic partnerships with employers, MDA, and transportation agencies.

**Measurement:** Number of affordable housing units developed within 10-15 miles of major employment hubs.

#### Goal 3: HOME Homeowner Activity. Increase Homeownership Opportunities for households

- Provide direct financial assistance to homebuyers at or below 80% AMI to bridge affordability gaps.
- Promote homebuyer education and counseling to improve long-term housing stability. **Measurement:** Number of first-time homebuyers assisted and the percentage of successful mortgage sustainment over time.

# Goal 4: ESG and HOPWA activity. Enhance Housing Stability & Homelessness Prevention Programs

- Use the ESG, HOME-ARP, and HOPWA programs to provide wraparound support services, including job training, transportation, case management, education, and other approved services to properties that prioritize identified special populations (homeless and 30% AMI).
- Require housing stability plans for all homeless prevention housing assistance programs (ESG, HOPWA) recipients to ensure long-term sustainability.
- Work with the CoCs to end the experience of homelessness and improving health outcomes by providing housing assistance through HOPWA and ESG.

**Measurement:** Number of formerly homeless individuals housed and percentage maintaining stable housing for 12+ months.

**Measurement:** Number of individuals who increased income while in the program.

# Goal 5: HOME Rental Development and Homeownership programs. Increase Manufacture Housing Stock for households.

Use manufacturer housing to address affordable housing needs.

**Measurement:** The number of manufactured units placed in communities with low housing stock.

# Goal 6: HOME Homeowner Activity. Increasing Outreach for Housing Preservation through Homeowner Rehabilitation Assistance

- Promote education, outreach, and services
  - o Provide community-based training to nonprofits and local governments to increase program awareness.

**Measurement:** Number of outreach and training events provided throughout the state.

Number of new agencies and communities that apply for homeowner rehabilitation assistance.

#### **Goal 7: Increase Community Knowledge about CHDOs**

 Operating support to foster, maintain and increase our Community Housing Development Organizations.

**Measurement:** Number of workshops, trainings, and Technical Assistance provided throughout the state.

Goal 8: CDBG Economic Development. Create, expand, and retain jobs for lower-income persons.

Goal 9: CDBG Economic Development. Create or expand employment at for-profit businesses.

**Goal 10: CDBG** Economic Development. Invest in eligible infrastructure that supports better-paying jobs for Mississippians.

#### **ESG Expected Outcomes**

#### Goal: ESG activity. Enhance Housing Stability & Homelessness Prevention Programs

- Use the ESG to provide **wraparound support services**, including job training, transportation, case management, education, and other approved services to properties that prioritize identified special populations (homeless and 30% AMI).
- Require housing stability plans for all homeless prevention housing assistance programs recipients to ensure long-term sustainability.
- Work with the CoCs to end the experience of homelessness and improve health outcomes by providing housing assistance through HOPWA and ESG.

**Measurement:** Number of formerly homeless individuals housed. Expect to serve a cumulative of 800 individuals with ESG.

- Decrease in the number of chronic homeless individuals identified.
- Decrease in the number of homeless individuals and households identified.

(use CoC or PIT data)

**Measurement:** The percentage of formerly homeless individuals that maintain stable housing for 6+ months.

The State expects that 50% or more of formerly homeless individuals served by ESG will maintain housing.

**Measurement:** Number of individuals who increased income while in the ESG program.

The State expects that 25% of households will increase income while in the ESG program.

**Goal:** Partner with low-income housing rental developments to provide Supportive Services.

**Expenditure limits.** The 2025 ESG program significantly changes amounts that can be expended within certain program categories:

- Not more than 60% of the fiscal year grant may be used for emergency shelter and street outreach activities.
- Not less than 40% of the fiscal year grant must be used for homelessness prevention, rapid rehousing and/or HMIS activities.
- Subject to the cost principles in OMB Circulars A-87 (2 CFR 225) and A-122 (2 CFR 230) and other requirements in this part, employee compensation and other overhead costs directly related to carrying out emergency shelter, homelessness prevention, rapid rehousing and HMIS are eligible costs of these program components. These costs are not subject to the expenditure limit for administrative activities.
- Indirect Cost: Applicants are allowed to charge indirect costs to the ESG grant using the 15 % de minimis rate. Agencies are encouraged to review HUD's Indirect Cost Toolkit for CoC and ESG programs before electing to use indirect cost.

#### **ESTIMATED ALLOCATION/ELIGIBLE ACTIVITIES**

# **Eligible Applicants**

The three Continua of Care (Mississippi Balance of State (BOS) CoC, Open Doors Homeless Coalition CoC, Central Mississippi CoC) and their member homelessness services provider organizations (to include faith-based organizations), and non- entitlement local units of government that operate existing homeless shelters and/or homeless programs, and non-profit agencies that operate existing homeless programs are eligible to submit applications in the ESG Program. Local units of government are not eligible to submit applications on behalf of nonprofit agencies. Nonprofit organizations within the City of Jackson limits will be eligible to submit applications in the street outreach, homelessness prevention, rapid rehousing, shelter and HMIS categories.

Pursuant to 24 CFR 576.406, faith-based activities, organizations that are religious or faith-based are eligible, on the same basis as any other organization, to receive ESG funds. Neither the Federal Government nor a State or local government receiving funds under ESG shall discriminate against an organization based on the organization's religious character or affiliation. Organizations that are directly funded under the ESG program **may not** engage in inherently religious activities, such as worship, religious instruction, or proselytization as part of the programs or services funded under ESG. If the organization conducts these activities, the activities must be offered separately, in time or location, from the programs or services funded under ESG, and participation **must** be voluntary for program participants. Any religious organization that receives ESG funds retains its independence from Federal, State, and local governments, and may continue to carry out its mission, including the definition, practice, and expression of its religious beliefs, provided that the religious organization does not use direct ESG funds to support any inherently religious activities.

#### THRESHOLD REQUIREMENTS

- 1. Nonprofits must submit verification of their nonprofit status, and proof of good standing with the Secretary of State for Mississippi, Articles of Incorporation, Bylaws and/or Constitution, and a copy of the Organizational Chart of Agency Board & Staff.
- 2. The application is fully completed
- 3. The applicant is registered with sam.gov and provides a unique entity identifier (UEI).
- 4. Applications submitted by a non-entitlement local unit of government must include a copy of the Resolution authorizing the submission of their application. The Resolution must be adopted by the local unit of government and must be signed and dated by the local unit of government's Chief Elected Official.
- 5. Applications submitted by private nonprofit organizations that are operating **existing** homeless shelters must include a copy of the authorizing Resolution. The Resolution must be adopted by the nonprofit organization's Board and must be signed and dated by the President of the Board.
- 6. Applications from private nonprofit organizations that are operating existing homeless shelters must also include a letter from the local unit of government approving the submission of the application. The letter must refer to the **current ESG program year** for which the application is being submitted and is signed by the Chief Elected Official or approved staff.
- 7. Match requirement must be documented in the application. The matching amount must be equal to the amount of ESG funds being requested. MHC may elect to give a match waiver to first-time ESG applicants.
- 8. Applicants must not have any unresolved audit or monitoring findings associated with the programs managed by MHC or HUD.
- 9. The applicant must disclose if they received any grants from MHC or HUD for which MHC or HUD was de-obligated part or all of the grant.
- 10. Applicants must disclose any loan or grant received from MHC for which MHC has issued a letter of findings associated with the use of an MHC operated program. Applicants must provide evidence that findings have been resolved. MHC may disqualify the applicant from consideration for funding based on this information. Findings may include, but is not limited to, failing to submit required reports.
- 11. The applicant must disclose all other grants and funding sources used to support activities and staff.
- 12. Any application that has been prepared by an application preparer that is involved in a pending debarment or suspension proceeding before a state or federal agent shall not be reviewed until such time as the debarment proceeding has been finally resolved. No person who is involved in a suspension or debarment proceeding shall be allowed to administer an ESG project until such time as the suspension or debarment process finding is resolved.
- 13. Homeless participation. If a sub-recipient is unable to meet the participation of homeless individuals' requirement in section 416(d) of the McKinney-Vento Act, the sub-recipient need not obtain approval of a formal waiver so long as the sub- recipient develops a plan to consult with homeless or formerly homeless individuals in considering and making policies

- and decisions regarding any facilities, services or other assistance that receive ESG funding.
- 14. The applicant must have most recent program-specific Single Accounting audit if they expended \$1,000,000 or more in Federal awards during the last fiscal year (CFR §200.501). All findings identified in the single audit must have a resolution. Financial statements must be prepared or audited by a CPA.
- 15. The applicant must be able to provide their audits, financial statements, and tax forms (IRS 990) for the **last three years**. Non-profit applicants must include a copy of IRS form 990 (Informational Tax Return of Organizations Exempt from Income Tax), or an explanation of why your organization has not been required to complete such a form.
- **16.** Completion of the Risk Assessment Questionnaire and submission of the Risk Assessment certification if applicable.
- 17. Shelters must submit Purchase or Lease Agreement for their Shelter Building
- 18. Section 3 Summary Report Form HUD 60002 must be submitted if necessary.

Section 416(f) of the McKinney-Vento Act, as amended by the HEARTH Act requires that projects receiving funding under the ESG program must participate in the Homeless Management Information System (HMIS). The data collected is essential to measuring what works and what doesn't. Accurate HMIS data will enable HUD to gain a more informed understanding of the problems of homelessness in our communities; the Continuum(s) of Care will assist in the participation of HMIS. Domestic Violence (DV) service providers must use a comparable database that meets Data Standards and must collect all the Universal Data Elements.

The Continuum of Cares (CoC) are eligible applicants for any services that can be provided in all ESG categories. ESG applicants must be members of one of the three CoC's and documented as such in the application. Consultation with the CoCs will occur through not only standard means of public hearings and public comment solicitation, but also one-on-one communications during the public comment period as well as throughout the year.

#### **MATCH Requirements**

Applicants must provide "dollar for dollar" matching funds. Pursuant to 24 CFR Part 576.201and 42 U.S.C. 11375, the ESG program requires that ESG funds provided by HUD be matched (cash and in-kind) with an equal amount of funds from other sources. In addition, at least 25% of the subrecipient's required match must be matched with liquid assets.

Matching contributions may be obtained from any source, including any Federal source other than the ESG program, as well as state, local, and private sources.

- In order to meet the matching requirement, the matching contributions **must** meet all requirements that apply to the ESG funds provided by HUD.
- The matching contributions **must** be provided after the date that HUD signs the grant agreement.
- To count toward the required match for the recipient's fiscal year grant, cash contributions must be expended within the expenditure deadline in 24 CFR Part 576.203.
- Contributions used to match a previous ESG grant <u>may not</u> be used to match a subsequent ESG grant.
- Contributions that have been or will be counted as satisfying a matching requirement of another Federal grant or award may not count as satisfying the matching requirement of this section.

Requirements for using cash and noncash contributions to match ESG grant:

- Cash expended for allowable costs as defined in OMB Circulars 2 CFR Part 225 and 2 CFR Part 230 of the recipient or sub-recipient.
- Cash donations and cash receipts from sale of donated items (thrift store), however, there may not be any duplication of this transaction, i.e., clothing donated and then sold through Thrift Store would be a duplication if counted both times.
- Noncash contributions may include but are not limited to real property, equipment, goods, or services. The value of any real property, equipment, goods, or services is determined by the cost, -the recipient or sub-recipient had to pay for them with grant funds, or if the activity represents indirect costs; and value may also include the purchase value of any donated building.

Calculating the amount of noncash contributions:

- Calculating noncash contributions: the value or fair market value of any donated material or building (this source can only be utilized as match one time), the value of any lease on a building.
- Services provided by individuals must be valued at rates consistent with those ordinarily
  paid for similar work in the sub-recipient's organization. If the sub-recipient does not have
  employees performing similar work, the rates must be consistent with those ordinarily paid
  by other employers for similar work in the same labor market (at a minimum rate of \$7.25
  per hour).

## **Eligible Beneficiaries**

#### **Beneficiaries**

The minimum eligibility criteria for the ESG program set forth by Mississippi Home Corporation are as follows:

- For essential services related to street outreach, beneficiaries must meet the definition of unsheltered homeless.
- For emergency shelter services and related essential services, beneficiaries must meet the definition of homelessness under paragraph (1) or (4).
- For rapid rehousing, beneficiaries must meet the definition of homelessness under paragraph (1), or (4).
- For homeless prevention, beneficiaries must verify that their household income is at or below 30% AMI, they have no other resources and meet the definition of homelessness under paragraph (2) or (4); imminent risk of homelessness.

Subrecipient must use a system approved by the federal government to verify the benefits are not provided to an ineligible alien who entered the United States illegally or is otherwise unlawfully present in the United States.

# **Eligible Program Activity Requirements**

- > Street Outreach
- Emergency Shelter
- Rapid Rehousing
- Homeless Prevention
- > HMIS

#### Street Outreach (24 CFR 576.101)

ESG funds may be used for the costs of providing essential services necessary to reach out to <u>unsheltered homeless people</u>, connect them with emergency shelter, housing, or critical services, and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. Essential services are targeted towards unsheltered homeless individuals. Essential services include case management, engagement, transportation, emergency health services, and transportation.

All street outreach activities must be document in HMIS and the client's file, and reported on the programs monthly, quarterly, and annual reports.

## **Emergency Shelter Component** (24 CFR 576.102)

Emergency shelter operations and services funded under this component provide access to emergency shelters and improve shelter quality. ESG funds may be used to provide essential services to homeless individuals and households in emergency shelters and fund shelter operations.

All ESG funded shelters must meet the standards outlined in the National Standards for Physical Inspection of Real Estate (NSPIRE) checklist.

All ESG funded shelters must enter shelter bed-count, and shelter residence into HMIS. Domestic Violence agencies may enter shelter residents information in VELA.

Mississippi Home Corporation (MHC) will not fund emergency shelters programs that are not connected, directly or indirectly, to a rapid rehousing or a permanent housing program.

All items purchased must be for the operation of the shelter and individuals receiving shelter services. All major maintenance or renovation activities connected to the grant, must first be approved in the application.

#### Emergency Shelter eligible expenses:

 Under the Emergency Shelter program component funds may be used to operate and maintain the emergency shelters and provide hotel or motel vouchers when no appropriate emergency shelter is available.

Eligible essential services cost under the ESG shelter component include:

- Hotel or motel vouchers for families or individuals who are unable to access shelter.
- Cost of program participant's travel on public transportation
- Life skills training which includes but not limited to budgeting resources and managing money (which may include payee services).
- Mental health services for outpatient treatment by licensed professionals of mental health conditions. ESG funds may only be used for these services to the extent that other appropriate mental health services are unavailable or inaccessible within the community.
- Substance abuse treatment services designed to prevent, reduce, eliminate, or deter relapse to substance abuse or addictive behavior.

- Treatment cost consists of outpatient treatment for up to 30 days. Group and individual counseling are eligible cost; inpatient detoxification and other inpatient drug or alcohol treatment are NOT eligible costs.
- Outpatient health services may be provided through ESG only to the extent that other appropriate health services are unavailable within the community.
- Educational services are an eligible cost, when necessary, for the program
  participant to obtain and maintain housing. Educational services include General
  Educational Development (GED) programs, and English as a Second Language
  program.
- Employment Assistance and Job Training programs are eligible including services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential.

## **Homelessness Prevention Component** (24 CFR 576.103)

ESG funds may be used to prevent an individual or a family from moving into an emergency shelter of another place described in paragraph (1) of the "homeless" definition in §576.2. Allowable activities for services provided with homeless prevention is in accordance with the housing relocation and stabilization services requirements in § 576.105. Homeless prevention assistance may be provided to individuals and families who meet the criteria under the "imminent risk of homelessness" definition, as defined in paragraph (2) of the homeless definition or who meets category 4 of the homeless definition in §576.2 and have an annual income at or below 30% of median family income for the area as determined by HUD. Funds may be used as described by §576.103 to prevent homelessness which may include relocation and stabilization services as described by §576.105.

#### Rapid Re-housing Component (24 CFR 576.104)

ESG funds may be used to provide rapid re-housing services/activities in accordance with the housing relocation and stabilization services requirements in § 576.105 and the short- and medium-term rental assistance requirements in § 576.106. Housing relocation and stabilization services/activities must be provided as necessary to help homeless individuals and households (meeting Category 1 or 4 of the HUD Homeless Definition) to quickly move to permanent housing and achieve stability.

#### REPORTING

# **Monthly Reporting**

Recipients of the ESG program must submit a monthly report detailing the number of applicants who received ESG services. Monthly reports must be emailed to <a href="mailto:mhc.rfc@mshc.com">mhc.rfc@mshc.com</a> by the 15th of the month following the reporting month. All reports must adhere to MHC's reporting requirements.

# **Quarterly Reporting**

Mississippi Home Corporation requires ESG funded agencies to provide a quarterly report regarding the use of program funds and outcomes related to the program's specific goals. Quarterly reports must be emailed to <a href="mailto:mhc.rfc@mshc.com">mhc.rfc@mshc.com</a> by the 15th of the month following the quarter month. All reports must adhere to MHC's reporting requirements.

#### **Annual Reporting**

Recipients of the ESG program **are required to submit** a Consolidated Annual Performance and Evaluation Report (CAPER) each year, covering the reporting period from July 1 to June 30. The CAPER may include data from multiple ESG program years and must align with the latest HMIS Data Standards. Recipients are required to submit accomplishment data through the Sage HMIS Reporting Repository (Sage) and provide their financial CAPER report directly to MHC within the designated submission window, typically between July and August.

It is crucial that all information reported in the CAPER is accurate and truthful. To ensure the accuracy of CAPER data, agencies must collect and enter information into HMIS correctly. The CAPER report should reflect services that have actually been provided. Therefore, applicants should not be marked as "in-program" unless they are actively receiving services.

#### **ESG Recaptured Funds Policy**

In compliance with **2 CFR 200** and **24 CFR 576** the Emergency Solutions Grant (ESG) program, Mississippi Home Corporation (MHC) reserves the right to recapture ESG funds from subrecipient under specific circumstances. This policy outlines the grounds, process, and consequences for the recapture of funds to ensure the effective and compliant use of grant resources.

MHC may recapture funds previously awarded to a ESG project sponsor for reasons such as failure to satisfy timeliness of the implementation of the project, failure to comply with contractual conditions, unresolved monitoring, waste, misuse, or abuse of funds, fraud, unfavorable audit report that is not resolved, inability to comply with policies, or failure to complete project closeout.

# **Grounds for Recapture of Funds**

MHC may recapture funds previously awarded to a subrecipient under any of the following conditions:

- Failure to meet performance standards: If the project sponsor fails to achieve the program's intended outcomes, including housing stability, services delivery, expenditure of funds, or other measurable objectives, funds may be recaptured.
- Non-compliance with program requirements: Any violation of federal, state, or local ESG regulations, including 24 CFR Part 576, or MHC's contractual obligations and policies, may result in recapture.
- Misuse or improper expenditure of funds: If funds are used for ineligible activities or expenditures that are not allowable under ESG regulations, they may be subject to recapture.
- Failure to maintain proper documentation: Inadequate financial or programmatic recordkeeping or failure to provide required documentation for monitoring, reimbursements, or audit purposes.
- Failure to comply with audit requirements: If a project sponsor fails to submit timely audit reports or fails to address findings from audits or monitoring visits.
- Suspension or discontinuation of program operations: If a project sponsor suspends or discontinues ESG-funded operations or activities without approval from MHC.
- **Untimely expenditure of funds**: If the project sponsor does not meet timeliness requirements for obligating and expending ESG funds.
- Unresolved monitoring or audit findings: Any unresolved findings from HUD, MHC, or other entities indicating that the project sponsor failed to comply with regulatory or contractual obligations may trigger recapture.
- · Breach of contract

# **De-Obligation or Termination of the Program Contract**

Based on the grounds for recapture or findings from monitoring results, MHC may **de-obligate and/or terminate an existing program contract**. This ensures that funds are only allocated to programs that demonstrate full compliance with ESG requirements and contractual obligations.

#### **APPLICATION REVIEW PROCESS**

# A. Eligibility Review

MHC will review applications to determine if all required documentation is included in the application packet. Failure to submit all required documentation by the deadline will result in elimination from consideration of funding.

#### B. Deficiencies

Applications that meet the prescreening eligibility requirements will be reviewed for completeness. Applicants may be contacted for clarification of the information presented in the application.

# C. Ranking of Applications

Applications will be evaluated and scored based on the Grant Review Scoring Guide.

#### **APLLICATION SCORING GUIDE**

Factors	Max Score	
Capacity and	15	New ESG
Experience		applicants'
Need or Extent of	15	maximum
Problem		points =
Collaboration	10	
Partnership		
CES and HMIS/Data	10	
monitoring		
Past Performance	5	
/Program Evaluation		
Program Plan & Project	15	
Description		
Program Goals &	15	
Outcomes		
Financial Controls &	15	
Budget		
Total	100	95

#### **Capacity and Experience 15 points**

In the application, points are given to agencies that have experience with administering federal grants. Max points can be obtained if the agency has ten or more years of experience in administering federal grants, has experienced key staff overseeing their grants, has sufficient staff to operate the program, and has the financial capacity to operate a reimbursement grant.

Agencies can describe their capacity and experience on the "**Application Info**" tab, the "**Project Budget**" tab, and the "**Attachment A**" tab in the ESG PY25 application.

Agencies' past ability to manage federal grant funds and program services to include the following will be considered understanding Capacity and Experience:

- Monitoring results
- Request for Cash processes
- Understanding and appropriately implementing federal and state regulations
- Completing training
- Meeting expenditure quarterly and contracted benchmarks

#### **Need or Extent of Problem 15 points**

In the application, points are given to agencies who have identified a need for services in their coverage area. Max points will be given to agencies that use appropriate data to describe the needs their proposed program will address clearly.

Agencies can describe the need and extent of the problem their proposed program will address on the "**Program Description**" tab and the "**Needs Analysis**" tab in the ESG PY 24 application.

*Program Description-* In the application program description, also:

- Identify service gaps or resources available in the identified service areas. *Needs Analysis*- In the application:
  - Describe the needs of the community and/or service area and how the need was determined. Include, but not limit to:
    - o Local and national data supporting the need;
    - o Statistical data and information from a Needs Assessments; and
    - Statistical data from other sources
  - Describe the expected level of need (measured by VI-SPDAT) of the clients
  - Describe how the proposed program will fulfill these needs; agency priorities; expected length of time in ESG for individuals and families; expected movement through the system for individuals and families.

#### **Collaboration Partnership 10 points**

In the application, points will be given to agencies who clearly describe and provide evidence of their community partnerships. Max points will be given to agencies with strategic and meaningful partnerships that have goals to improve outreach efforts and housing stability among the target population.

Agencies must provide Memorandums of Understanding/Agreements and letters of support from partnering agencies. Applicants are encouraged to partner and coordinate with other agencies to increase services and to consider the need for transportation and income as it is relevant for housing stability. Additionally, agencies can describe their strategic partnerships on

the "Program Info..." tabs in the ESG PY25 application.

Collaboration- In the application:

- Provide a description of outreach efforts.
- Describe any coordination of services with other homeless programs.
- Describe partnerships and collaborations established with other organizations, agencies, volunteer services, and funders to operate the proposed program effectively.
- Describe how the services provided through these partnerships help to meet the needs of the client and promote self-sufficiency

#### **CES and HMIS/Data monitoring 10 points**

In the application, points will be given to agencies that use HMIS or other HUD acceptable databases. These agencies must demonstrate their ability to provide accurate data in data reports and participate in their local Coordinated Entry System (CES). Agencies can describe their use of HMIS and participation in CES on the "**Project Info ESG Components**" tab, Section C- HMIS. Additional information will be obtained from the CoC regarding the agency's participation and HMIS data quality.

#### Reporting

The HEARTH Act requires that ESG Subrecipients participate in HMIS as well as all HUD data collection requirements. ESG Subrecipients must comply with HUD's standards on participation, data collection, and reporting requirements. Victim service providers are prohibited from utilizing HMIS but must use a comparable database. The comparable database must produce unduplicated and aggregated reports, including the CAPER. Please describe how your agency ensures compliance with HMIS or comparable data requirements, data entry, and data quality standards as well as ESG CAPER data requirements.

#### Past Performance/Program Evaluation 5 points

In the application, points will be given to agencies based on their past performance. Agencies can describe their past performance on the "**Past Performance**" tab in the application. Additionally, the agency's performance in past MHC awards will be consider including agencies' ability to meet the terms of their contract, past monitoring results, and history of de-obligation.

#### Past Performance

 In the application, describe previous performance utilizing ESG funds (if applicable); discuss the number of individuals/households served and the outcome (i.e. permanent housing, increased income).

# **Program Plan & Project Description 15 points**

In the application, points will be given to agencies who have a well develop plan for providing services and transitioning applicants to housing stability and self-sustainability. Using the questions listed on the "Program Info ESG" tabs, agencies can describe their experience with homeless housing programs, their housing stability plans, their community partnerships, their housing outreach efforts, and their discharge strategies.

Agencies can describe their program plans on the "**Program Description**" tab, and "**Project Info**" tab in the application.

*Program Description (5 pts)-* In the application:

- Describe the proposed program.
- Identify the need and describe how the proposed program can provide resolution.
- Describe how the proposed program will operate in detail. The description should include how clients are referred and what types of services are provided from entry to exit of the proposed program.
- In the description include evidence based best practices that are being used.

Project Info (10 pts per tab)- In the application:

- Describe your experience with the population.
- Describe how your requested services will be used to promote stability.
- Describe employment efforts (provided directly or through partnerships)
- Describe community coordination of services.
- Identify methods to recruit landlords. Points will be given if you have existing partnerships with Developers and Tax Credit and HOME funded properties.
- What are your case management and discharge practices? Include the case management best practice methodology used.

#### Program Goals & Outcomes - 15 points

In the application, points will be given to agencies whose program goals are clearly described and are in line with the National Strategic Goals-HOME and MHC goals identified in the State's ConPlan.

Agencies can describe their goals on the "Proposed Outcomes" in the application.

#### Proposed Outcomes and Goals

- In the application, describe the impact that will result from the program being funded including, but not limited to, the following, as applicable:
  - Increased accessibility to affordable housing.
  - o Overall reduction in number of persons who experience homelessness.
  - o Reduction in the length of homelessness.
  - Reduction in returns to homelessness.
  - Increased employment and income growth for persons who are experiencing homelessness.
  - Average length of time between intake and assistance given.
  - Other goals and objectives of your program
- In the application, describe what processes are in place for tracking program outcomes.
- In the application, describe how the proposed program outcomes and performance is/will be measured.

#### Financial Controls -15 points

In the application, agencies are marked on their financial controls and feasibility to manage the ESG reimbursement grant. Agencies can describe their financial controls on the "**Match Funds**" tab, the "**Program Budget**" tab, and the "**Budget Summary**" tab in the application.

#### Financial Information

 In the application, describe your organization's financial control system and procedures. Include an explanation of how ESG funds will be monitored to ensure dollars are spent in a timely manner and how funds will be applied and

- tracked against eligible activities. Include a description of the draw and reimbursement process.
- In the application, describe budgeting priorities/activities to stretch ESG funds through the grant period.
- In the application, describe the sources of funds that are available for the proposed program; describe matching funds; discuss how funding sources will be used if ESG is not funded.

#### **SELECTION PROCESS**

The ESG funds will be awarded based on the final points of the ESG Grant Review Scoring Guide. Applicants must score at least 75% out of 100 points; new agencies minimum score is 65% due to lack of ESG past performance. MHC will evaluate applicants using proposed outputs and outcomes, past performance and spending practices, financial management, gap analysis, and alignment with Consolidated Plan goals. This evaluation will also include a CoC-approved support letter, a formal evaluation (if available), and any submitted MOUs or commitment letters. These elements will be incorporated into the outcome measurements for applicants selected as subrecipients. Other factors that are considered with an application include experience, internal controls, partnerships, capacity, complaints, finances, other. MHC uses a z-score ranking system that considers total funding request along with all other factors to determine a funding recommendation amount.

MHC board makes the final decision of agencies selected and funding amounts.
 MHC reserves the right to adjust the amount awarded based on the amount of funds available and based on the demand created by the applications submitted. MHC will email all applicants a letter with the funding decision.

#### SHELTER AND HOUSING STANDARDS

Pursuant to the **NSPIRE regulations**, HUD requires the following for lead-based paint and minimum standards:

**Lead-based paint remediation and disclosure:** The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M and R apply to all shelters assisted under ESG program and all housing occupied by program participants.

#### REMEDIAL ACTIONS AND SANCTIONS

Remedial actions and sanctions for failure to meet the ESG program requirement will be designed to prevent a continuation of the deficiency; mitigate, to the extent possible, its adverse effects or consequences; and prevent its recurrence through the following actions:

- MHC may instruct the recipient to submit and comply with proposals for action to correct, mitigate, and prevent noncompliance with ESG requirements including:
  - ✓ Preparing and following a schedule of actions for carrying out activities affected by the noncompliance, including schedules, timetables, and milestones necessary to implement the affected activities.
  - ✓ Establishing and following a management plan that assigns responsibilities for carrying out the remedial actions.
  - ✓ Canceling or revising activities likely to be affected by the noncompliance, before expending ESG funds for the activities.
  - ✓ Reprogramming ESG funds that have not yet been expended from affected activities to other eligible activities.
  - ✓ Suspending disbursement of ESG funds for some or all activities.
  - ✓ Reducing or terminating the remaining grant of sub-recipient and reallocating those funds to other sub-recipients; and
  - ✓ Requiring match contributions before or as withdrawals are made from the recipients' ESG grant.
- MHC may suspend payments to the extent HUD deems it necessary to preclude further expenditure of funds for affected activities.
- MHC may remove the recipient from participation in reallocations of funds.
- MHC may deny matching credit for all or part of the cost of the affected activities and require the recipient to make further matching contributions to make up for the contribution determined ineligible.
- MHC may place conditions on future grants.
- MHC may take other remedies that are legally available.

#### **GENERAL REQUIREMENTS**

Sub-recipients are required to carry out their projects in accordance with the regulations for the Emergency Solutions Grants Program, McKinney-Vento/HEARTH Act, Title IV (42 U.S.C. 11371) and 24 CFR 576.

The ESG program shall be governed by MHC's 2024 application package; the Program Description; MHC's recommended policy and procedure manual, agencies policy and procedure manual, 24 CFR 576 and any subsequent changes, additions, clarifications, requirements, or assurances issued by MHC or HUD that relate to the program.

Applicants are strongly encouraged to read MHC's ESG Policy and Procedures Manual which is available at <a href="https://www.mshomecorp.com/federal-programs/esg/">https://www.mshomecorp.com/federal-programs/esg/</a>.

If questions or interpretation of any rule, requirement, or regulation arise, MHC's or HUD's decision shall be final.

During the review of the applications, MHC shall verify information for accuracy and determine feasibility and readiness of the project. This review may result in disqualification of an application.

During the review of the 2024 ESG application, MHC reserves the right to adjust the amount of the request. This adjustment will be based on verification of cost, availability of other funds and the availability of ESG funds.

#### A site visit does not imply that an applicant will be funded.

Exceptions to minimum and maximum grant amounts may be allowed by MHC.

Anyone receiving ESG funds must comply with 24 CFR Part 570, Equal Opportunity and Fair Housing, Affirmative Marketing and MBE/WBE requirements. In order to comply, the applicant must at a minimum meet the requirements set forth in the regulations and/or MHC's plan.

MHC may recapture funds previously awarded to an ESG recipient for reasons such as failure to satisfy timeliness of the implementation of the project, failure to comply with contractual conditions, or failure to complete project closeout. Recaptured or de- obligated ESG funds may be used to supplement Administration, supplement existing projects which may require additional funds, fund other eligible applicants, or fund ESG eligible activities.

In order to minimize displacement in accordance with 24 CFR Part 576.408, Displacement, Relocation and Acquisition, applications which include permanent displacement of any resident **will not** be accepted.

Applications must contain documentation evidencing a firm commitment of matching funds. The matching amount must be equal to the amount of ESG funds being requested. The match amount may include funds from other sources; the value or fair rental value of any donated material or building (this source can only be utilized as match one time); the value of any lease on a building; any salary paid to staff to carry out the program of the recipient; and the value of the time and services (at a minimum rate of \$7.25 per hour) contributed by volunteers to carry out the program of the recipient. If match includes funds from other sources

or the value of time and services contributed by volunteers to carry out the program, applicants must provide a copy of the Memorandum of Understanding or Agreement, or a letter of support from the entities providing match. This documentation must identify the match type, match amount and must cover the grant Program Year period for the 2024 application cycle.

If a facility is to be used as matching funds, a recent appraisal (**less than two years**) of the facility must be included with this application package. If the value of any lease on a building is to be used as matching funds, a copy of the lease information indicating the lease amount must be included with this application. If donated materials are to be utilized as match, documentation from the donor indicating the type of materials and their value and the date or proposed date of the donation must be submitted in the application.

#### **FEDERAL REQUIREMENTS**

All sub-recipients will be required to comply with certain federal and state requirements. The following briefly describes major requirements that may apply:

**McKinney-Vento Act, as amended by the HEARTH ACT: 24 CFR Parts 91 and 576** This Act authorized the ESG Program, all applicable provisions of the Act shall be adhered to by recipients. The ESG Program broadens existing emergency shelter and homelessness prevention activities and to add short- and medium-term rental assistance and services to rapidly re-house homeless people.

- ESG funds from each federal fiscal year (i.e. the allocation and any reallocated funds from the particular federal fiscal year appropriated) will be closed out when all program requirements have been met.
- Each applicant must establish and maintain sufficient records to enable MHC and HUD to determine whether the ESG requirements are being met of 24 CFR Part 576.500,
   Recordkeeping and Reporting Requirements.
- Applicants must comply with the requirements of 24 CFR Part 576.404, Conflict of Interest. The conflict-of-interest provisions under this section (24 CFR Part 576.404(b) (1) apply to any person who is an employee, agent, consultant, officer, or elected or appointed official of the recipient or its sub-recipients. No person just mentioned who exercises or has exercised any functions or responsibilities with respect to activities assisted under the ESG program, or who is in a position to participate in a decision-making process or gain inside information with regard to activities assisted under the program, may obtain a financial interest or benefit from an assisted activity; have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity; or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has family or business ties, during his or her tenure or during the one-year period following his or her tenure. MHC has no waiver under the conflict of interest provision.
- The federal requirements of 24 CFR Part 576.408, Displacement, Relocation, and Acquisition, concerning relocation must be followed at all times when a unit to be rehabilitated is occupied prior to the beginning of construction of rehabilitating the unit.

Affirmative outreach. The recipient or sub-recipient must make known that use of the facilities, assistance, and services are available to all on a nondiscriminatory basis. If it is unlikely that the procedures that the recipient or sub-recipient intends to use to make known the availability of the facilities, assistance, and services will be to reach persons of any particular race, color, religion, sex, age, national origin, familial status, or disability who may qualify for those facilities and services, the recipient or sub-recipient must establish additional procedures that ensure that those persons are made aware of the facilities, assistance, and services. The recipient and its sub-recipients must take appropriate steps to ensure effective communication with persons with disabilities including, but not limited to, adopting procedures that will make available to interested persons. Consistent with **Title VI and Executive Order 13166**, recipients and sub-recipients are also required to take reasonable steps to ensure meaningful access to programs and activities for Limited English Proficiency (LEP) persons.

**HEARTH ACT –** This Act consolidates, and amends three separate homeless assistance programs carried out under Title IV of the McKinney-Vento Homeless Assistance (42 U.S.C. 11371) into a single grant program designed to improve administrative efficiency and enhance response coordination and effectiveness in addressing the needs of homeless persons and revises the Emergency Shelter Grants program and renames it as the Emergency Solutions Grants (ESG) program.

**The Civil Rights Act** – This Act provides that no person in the United States shall on the grounds of race, color, or national origin, be excluded from participation, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity for which the recipient receives federal financial assistance. The recipient shall also administer all programs and activities relating to housing and community development in a manner to affirmatively further fair housing.

**Age Discrimination Act of 1975 –** This Act states that no person on the basis of age shall be subject to discrimination, be excluded from participation in, or be denied the benefits of any program or activity for which the recipient receives federal funds. **Section 504 of the Rehabilitation Act of 1973** – This Act provides that no person shall be denied due to physical or mental handicap, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity for which the recipient receives federal funds. **HUD's regulations at 24 CFR part 8** apply to the ESG program accessibility requirements under Subpart C – Program Accessibility. Grantees are required to provide reasonable accommodations for persons with disabilities in order to enable program participants with a disability to have an equal opportunity to participate in the program or activity.

National Environmental Policy Act and 24 CFR Part 58 – This act provides for the identification of environmental impacts of proposed projects utilizing federal funds. This includes the preparation of environmental assessments and, where necessary, environmental impact statements.

**Lead-Safe Housing Regulation** – Under this Act the construction or rehabilitation of residential structures or non-dwelling facilities commonly used by children under seven years of age with federal assistance is subject to regulations contained in 24 CFR Part 58.

**Government-Wide Restriction on Lobbying** – This Act ensures that no federal funds will be paid for influencing or attempting to influence an office or employee of any agency or Member

of Congress in conjunction with awarding of any federal contracts, grants, loans, etc.

**Executive Order 11246** – This Order and the regulations issued pursuant to 24 CFR Part 130 and 41 CFR Chapter 60, provides that no person shall be discriminated against on the basis of race, color, religion, sex or national origin in all phases of employment during the performance of federal and federally assisted construction contracts.

Section 3 – Section 3 of the Housing and Urban Development Act of 1968, 12 U.S.C. 1701(u) and implementing regulations at 24 CFR part 135 apply, except that homeless individuals have priority over other Section 3 residents in accordance with Section 576.405(c). To the maximum extent practicable, the recipient or sub-recipient must involve homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under ESG, in providing services assisted under ESG, and in providing services for occupants of facilities assisted under ESG. This involvement may include employment or volunteer services.

**Confidentiality** – 24 CFR 500(x)(i)(2) The recipient and its sub-recipients must development and implement written procedures to ensure:

- ✓ All records containing personally identifying information (as defined in HUD's standards for participation, data collection, and reporting in a local HMIS) of any individual or family who applies for any/or receives ESG assistance will be kept secure and confidential.
- ✓ The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under the ESG will not be made public, etc.
- ✓ The address or location of any housing of a program participant will not be made public, etc.
- ✓ The confidentiality procedures of the recipient and its sub-recipients must be in
  writing and must be maintained in accordance with this section. Period of record
  retention for each fiscal year of ESG funds is the greater of 5 years or as
  specified in this section 24 CFR 576.500(y)(1)(2)(3).

**Audit Requirements -** The OMB's Circular 2 CFR 200.501 requires that a state, local government or non-profit organization expending \$1,000,000 or more a year in total cumulative Federal funds must have a Single Audit made in accordance with the Single Audit Act. A copy of the audit report must be received by MHC no later than nine months following the end of the grant recipient's fiscal year in which the Federal funds were expended.

If less than \$750,000 in total cumulative Federal funds were expended within the fiscal year, and any of the funds were received through MHC, an acceptable MHC Funding Certification Form (for that year only) shall be submitted. It must be received by MHC no later than nine months following the end of the grant recipient's fiscal year in which the Federal funds were expended, and no sooner than the end of the same fiscal year.

**Cost Principles -** Subject to the cost principles in OMB Circulars 2 CFR 225 and 2 CFR 230 and other requirements in this part, employee compensation and other overhead costs directly related to carrying out emergency shelter, homelessness prevention, rapid re-housing and HMIS are eligible costs of these program components. These costs are not subject to the expenditure limit for administrative activities.

**Procurement** – 24 CFR 85 outlines the standards and guidelines for the procurement of supplies,

equipment, construction, and services to ensure that they are obtained as economically as possible through an open and competitive process, and that contracts are managed with good administrative practices and sound business judgment

**Procurement of Recovered Materials** – The recipient and its contractors must comply with Section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act.

# APPEAL PROCESS FOR DENIAL OF ESG FUNDING

Emergency Solutions Grant (ESG) applicants wishing to appeal a decision of MHC to deny ESG funding may do so in writing within ten (10) business days of the date of the denial/rejection letter.

The request for reconsideration must be submitted in writing via mail to:

Tamara Stewart, VP of Federal Grants Mississippi Home Corporation 735 Riverside Dr, Jackson MS 39202-1166

Any written appeal shall specifically identify the grounds for appeal and include appropriate supporting documentation related to the facts of the original application that would lead MHC to reach a different conclusion in evaluating the original application.

Applicants may only appeal decisions based on program eligibility requirements.

Appeals filed within the required time frame will be reviewed by the Programs Funding Committee. All appeal determinations made by MHC are final with no further administrative review and are not subject to judicial review.