

Exhibit 36-4D
Emergency Solutions Grants (ESG) Program
Coronavirus Relief and Economic Security Act (CARES Act)

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Guide for Review of ESG-CV Street Outreach Requirements			
Name of Recipient:			
Name of Subrecipient(s):			
Staff Consulted:			
Name(s) of Reviewer(s)		Date	

NOTE: All questions that address requirements contain the citation for the source of the requirement (statute, regulation, or grant agreement). If the requirement is not met, HUD must select "NO" in response to the question and make a finding of noncompliance. All other questions that do not contain the citation for the requirement do not address requirements, but are included to assist the reviewer in understanding the participant's program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a "**finding**."

Instructions: This Exhibit is designed to assess the recipient's compliance with the Street Outreach component of the Emergency Solutions Grant (ESG) program as funded and modified under the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), otherwise known as ESG-CV. Requirements at 24 CFR Part 576 apply to the use of these funds, unless otherwise provided by the alternative requirements and flexibilities established under the CARES Act, Notice CPD-21-08, Notice CPD-22-06, or other HUD waivers or CPD Notices. Notice CPD-21-08, published July 19, 2021, supersedes Notice CPD-20-08 and reestablishes the allocation formula and amounts and reestablishes and announces new requirements for ESG funding. As provided in Notice CPD-21-08 and Notice CPD-22-06, recipients that received particularized waivers or exceptions are permitted to apply those waivers and exceptions subject to the conditions provided in those waivers or exceptions, although they may also use any further flexibility provided in Notice CPD-21-08 under the conditions and alternative requirements provided in the Notice.

All waivers HUD has provided for ESG-CV funds under the CARES Act waiver authority apply retroactively as provided by the CARES Act (NOTE: waivers provided under the waiver authority in 24 CFR 5.110 are not retroactive, even if applied to ESG-CV grants). Except as otherwise stated in Notice CPD-21-08, waivers and alternative requirements HUD provided as authorized by the CARES Act were deemed to be effective as of the date a State or unit of local government began preparing for coronavirus, which HUD presumes to be January 21, 2020 – the date the first confirmed case was reported in the United States. However, each recipient must maintain adequate documentation (including documentation demonstrating when their particular state or local government began preparing for coronavirus) to assure these waivers and alternative requirements are used only with respect to ESG- or ESG-CV-eligible activities the recipient or its subrecipients implemented to prevent, prepare for, and respond to coronavirus.

This Exhibit is to be used to monitor not only the use of ESG-CV grant funds, but the use of FY 2020 and older ESG grant funds the recipient designated for use in preventing, preparing for, and responding to coronavirus. A recipient may have expended annual ESG funds both for activities

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used to prevent, prepare for, and respond to coronavirus as well as activities not specifically designated for coronavirus response. In those cases, monitors are instructed to use the Exhibits in Chapter 36 to monitor annual ESG-funded activities designated for coronavirus response; Exhibits in Chapter 28 are to be used to monitor annual ESG-funded activities not designated for coronavirus response.

The eligible activity areas of review include the costs charged to this component as essential services necessary to reach out to unsheltered homeless people; 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.

This Exhibit can be used to monitor a recipient, a single subrecipient, or multiple subrecipients. It is the responsibility of the HUD reviewer to ensure that the responses provide sufficient documentation to support the basis for the conclusions. Keep in mind that, if multiple entities are reviewed and a deficiency is identified for a single entity, a “No” response is required.

Questions:

A. ELIGIBLE ACTIVITIES UNDER STREET OUTREACH

1.

Were persons assisted with street outreach essential services determined and documented to be eligible for assistance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
[24 CFR 576.401(a); 24 CFR 576.500(b); 24 CFR 576.101(a)]			
Describe Basis for Conclusion:			

2.

Street Outreach: Except as provided under Notice CPD-21-08, were street outreach costs limited to the costs of: providing essential services necessary to reach out to unsheltered homeless people; connecting unsheltered homeless people with emergency shelter, housing, or critical services; and providing urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
NOTES:			
<ul style="list-style-type: none">• Notice CPD-21-08 waives the limitations on eligible activities provided in Section 415(a) of the McKinney-Vento Homeless Assistance Act and 24 CFR 576, subpart B and establishes alternative requirements to the extent necessary to authorize ESG-CV funds to be used under 24 CFR.576.101(a) for the costs of providing laundry services; handwashing stations; portable bathrooms; vaccine incentives; hazard pay; training on infectious disease prevention and mitigation for staff;			

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volunteer incentives; and the costs of loaning cell phones with wireless plans to program participants to conduct activities necessary for obtaining and maintaining housing. • The CARES Act waives the cap on street outreach and emergency shelter activities established under 24 CFR 576.100(b). [24 CFR 576.101(a)]	
Describe Basis for Conclusion:	

3.

<u>Engagement:</u> Were ESG-CV funds used for Street Outreach engagement limited to the costs listed under 24 CFR 576.101(a)(1)? [24 CFR 576.101(a)(1)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion:	

4.

<u>Case Management:</u> Were ESG-CV funds used only for the costs of assessing housing and service needs, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant, for services and activities listed under 24 CFR 576.101(a)(2)? [24 CFR 576.101(a)(2)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion:	

5.

<u>Emergency Health Services:</u> Were ESG-CV funds used for emergency health services limited to the costs of direct outpatient treatment of medical conditions (as listed under 24 CFR 576.101(a)(3)) that is provided: a. by licensed medical professionals operating in community-based settings, including streets, parks, and other places where unsheltered homeless people are living, and b. only to the extent that other appropriate health services are inaccessible or unavailable within the area? [24 CFR 576.101(a)(3)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
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Describe Basis for Conclusion:

6.

Emergency Mental Health Services: Were ESG-CV funds used for emergency mental health services limited to the costs associated with direct outpatient treatment (as listed under 24 CFR 576.101(a)(4)) that is provided: a. by licensed professionals of mental health conditions operating in community-based settings including streets, parks, and other places where unsheltered people are living, and b. only to the extent that other appropriate health services are inaccessible or unavailable within the area? [24 CFR 576.101(a)(4)]	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div><div><input type="checkbox"/> N/A</div></div>
Describe Basis for Conclusion:	

7.

Transportation: Were ESG-CV funds used for transportation limited to the following eligible costs: a. the transportation costs of travel by outreach workers, social workers, medical professionals, or other service providers, and that the travel took place during the provision of services eligible under this section; and b. the costs of transporting unsheltered people to emergency shelters or other service facilities, as listed under 24 CFR 576.101(a)(5)? [24 CFR 576.101(a)(5)]	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div><div><input type="checkbox"/> N/A</div></div>
Describe Basis for Conclusion:	

8.

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<u>Hazard Pay</u> : Were ESG-CV funds used for hazard pay provided only to recipient- or subrecipient-staff working directly to prevent, prepare for, and respond to coronavirus among persons who are homeless or at risk of homelessness? [Section III.E.3.c of Notice CPD-21-08]	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div><div><input type="checkbox"/> N/A</div></div>
Describe Basis for Conclusion: 	

9.

<u>Handwashing Stations and Portable Bathrooms</u> : Were ESG-CV funds used for handwashing stations and portable bathrooms in outdoor locations for people experiencing unsheltered homelessness limited to costs related to installation and maintenance in outdoor locations? [Section III.E.3.d of Notice CPD-21-08]	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div><div><input type="checkbox"/> N/A</div></div>
Describe Basis for Conclusion: 	

10.

<u>Volunteer Incentives</u> : Were ESG-CV funds used for volunteer incentives limited to reasonable incentives to volunteers who have been and are currently helping to provide necessary street outreach, essential services during the coronavirus outbreak? [Section III.E.3.f of Notice CPD-21-08]	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> Yes</div><div><input type="checkbox"/> No</div><div><input type="checkbox"/> N/A</div></div>
Describe Basis for Conclusion: 	

11.

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<p>Cell Phones: If ESG-CV funds were used for the costs of providing cell phones, was the cell phone:</p> <ul style="list-style-type: none"> Owned by the recipient/subrecipient and loaned to individuals and families experiencing homelessness, receiving rapid re-housing assistance under the Continuum of Care (CoC) Program, Youth Homelessness Demonstration Program (YHDP), and ESG program, receiving homelessness prevention assistance under the ESG Program, or residing in PSH funded under the CoC and YHDP programs? Needed to enable program participants to participate in activities necessary to obtain or maintain housing? Returned to the recipient/subrecipient when no longer necessary (i.e., once stay-at-home or social distancing orders are no longer in effect in the community in which the program participant resides, or when the phone is no longer needed to participate in activities necessary to obtain and maintain housing because those activities are no longer conducted virtually). <p>[Section III.E.3.g of Notice CPD-21-08]</p>	<div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </div> <div style="display: flex; justify-content: space-around; font-weight: bold;"> Yes No N/A </div>
<p>Describe Basis for Conclusion:</p>	

12.

<p>Vaccine Incentives: If ESG-CV funds were used to make direct, cash payments as an incentive for receiving the coronavirus vaccine, were the payments provided:</p> <ol style="list-style-type: none"> only in amounts not exceeding \$50 per dose; only to people experiencing homelessness; and only to the extent that other vaccine incentives were inaccessible or unavailable to people experiencing homelessness within the community? <p>[Section III.E.3.m of Notice CPD-21-08]</p>	<div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </div> <div style="display: flex; justify-content: space-around; font-weight: bold;"> Yes No N/A </div>
<p>Describe Basis for Conclusion:</p>	

13.

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<p>Laundry: If ESG-CV funds were used for the costs of providing laundry services, including by paying for laundry trucks, were those services provided for individuals and families experiencing unsheltered homelessness?</p> <p>[Section III.E.3.n of Notice CPD-21-08]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>Describe Basis for Conclusion:</p>	

14.

<p>Minimum Period of Use: Did the recipient ensure that outreach services were provided to unsheltered homeless individuals and families for at least the period during which ESG-CV funds were provided (e.g., the length of the subrecipient agreement)?</p> <p>[24 CFR 576.101(b)]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>Describe Basis for Conclusion:</p>	

15.

<p>Maintenance of Effort: If the recipient or subrecipient is a unit of general purpose local government, and its ESG-CV funds were used to replace local government funding of street outreach services, did HUD determine that the unit of general purpose local government was in a severe financial deficit according to the guidelines at 24 CFR 576.101(c)(2)?</p> <p>[24 CFR 576.101(c)]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
<p>Describe Basis for Conclusion:</p>	

16.

<p>Written Standards: Were all activities carried out in compliance with the applicable written standards for targeting and providing essential services related to street outreach?</p> <p>NOTE: For costs incurred between January 21, 2020 and June 30, 2020 that are allowable under Notice CPD 21-08 but not under 24 CFR Part 576, HUD waived the requirement to administer the assistance in accordance with written standards as provided under 24 CFR 576.400(f) for the first 60 days of the project's operation, as stated in section III.F.5 of Notice CPD-21-08.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
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[24 CFR 576.400(e)(1), (2), and (3)(ii); Section III.F.5 of Notice CPD-21-08]	
Describe Basis for Conclusion:	

17.

<p>Lead-Based Paint: Where ESG funds were used for supportive services in connection with particular shelter(s) or housing, do records reflect that the recipient and its subrecipient(s) complied with all lead-based paint requirements?</p> <p>NOTE: The HUD reviewer MUST complete the applicable Exhibits in Chapter 24 of this Handbook to answer this question: Exhibit 24-2.</p> <p>[24 CFR 576.403(a); 24 CFR Part 35, Subpart K]</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> Yes No N/A
Describe Basis for Conclusion:	

B. EQUAL ACCESS

18.

<p>Did each service provider reviewed maintain written policies and procedures ensuring equal access is provided to individuals in accordance with the individual's gender identity, and in a manner that affords equal access to the individual's family?</p> <p>NOTE: Equal access ensures that, when consideration of sex is prohibited or not relevant, individuals will not be discriminated against based on actual or perceived gender identity, and where legitimate consideration of sex or gender is appropriate, such as in a facility providing temporary, short term shelter that is not covered by the Fair Housing Act, and which is legally permitted to operate as a single-sex facility, the individual's own self-identified gender identity will govern.</p> <p>[24 CFR 5.106(b) and 5.106(d)]</p>	<input type="checkbox"/> <input type="checkbox"/> Yes No
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Describe Basis for Conclusion:

19.

<p>Did each service provider reviewed maintain written policies and procedures ensuring that individuals are placed, served, and accommodated in accordance with their gender identity and are not subjected to intrusive questioning or asked to provide anatomical information or documentary, physical, or medical evidence of the individual's gender identity?</p> <p>NOTES:</p> <ul style="list-style-type: none">• Examples of asking a client to provide evidence would be asking to provide evidence about someone's physical anatomy, medical records, or identification documents that record their gender identity.• Examples of unnecessary, intrusive questioning would be asking about surgeries or other medical treatment, physical anatomy, and any other topics that are not necessary for placing and serving a client in the facility. <p>[24 CFR 5.106(b)(3) and 5.106(d)]</p>	<div style="text-align: center;"><input type="checkbox"/> <input type="checkbox"/> Yes No</div>
<p>Describe Basis for Conclusion:</p>	