

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

6509.2 REV-7 CHG 4

<b>Guide for Review of ESG-CV Rapid Re-housing and Homelessness Prevention Requirements</b>	
<b>Name of Recipient:</b>	
<b>Name of Subrecipient(s):</b>	
<b>Staff Consulted:</b>	
<b>Name(s) of Reviewer(s)</b>	<b>Date</b>

**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 Rapid Re-housing and/or Homelessness Prevention component(s) 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.

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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 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: Housing Relocation and Stabilization Services – Services; Housing Relocation and Stabilization Services – Financial Assistance; and Short- and Medium-term Rental Assistance. These activities are eligible when necessary to either (1) help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing, or (2) prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the “homeless” definition in 24 CFR 576.2.

The Exhibit is divided into three sections: General Requirements; Housing Relocation and Stabilization Services; and Short- and Medium-term Rental Assistance. Section B is broken down into sub-sections for Financial Assistance Costs and Services Costs. Section C is broken down into sub-sections for General Requirements and Project-based Rental Assistance. Every question has a header identifying the specific area of review. If the ESG recipient has not funded a particular activity or cost, check the N/A box and continue on to the next section, sub-section, or question of the Exhibit. Note: when used in this exhibit “owner” should be understood to include: (1) the sponsor, where the program participant is assisted through sponsor-based rental assistance, as provided by section III.E.3.o(vi) of Notice CPD-21-08, AND (2) the primary leaseholder, where the program participant has subleased the unit from another tenant, as provided by section III.E.4.j of Notice CPD-21-08.

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. GENERAL REQUIREMENTS**

1.

<b>Initial Evaluation:</b> Did the recipient or its subrecipient conduct an initial evaluation to determine each individual or family’s eligibility for rapid re-housing or homelessness prevention assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing? [24 CFR 576.401(a)]	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>	<input type="checkbox"/> <b>N/A</b>
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<b>Describe Basis for Conclusion:</b>
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2.

<p><b>Eligibility Criteria (Homelessness Prevention):</b> Did the recipient or its subrecipient document that all program participants who received homelessness prevention assistance:</p> <ul style="list-style-type: none"> <li>a. met the eligibility criteria of the “at risk of homelessness” definition in section I.B.1.a of Notice CPD-21-08, qualified as “homeless” under paragraphs (2), (3), or (4) of the definition in 24 CFR 576.2, or met the alternative criteria noted below; <u>and</u></li> <li>b. have an annual income (as determined in accordance with 24 CFR 5.609) that does not exceed the Very Low Income limit for the area as established by HUD for HUD’s Section 8 and Public Housing Programs at <a href="http://www.huduser.gov/portal/datasets/il.html">www.huduser.gov/portal/datasets/il.html</a>?</li> </ul> <p>NOTE: In accordance with the FY2020 funding conditions made applicable by section 23003 of the CARES Act and the ESG-CV grant agreement, unaccompanied youth aged 24 and under (or families headed by youth aged 24 and under) who have an unsafe primary nighttime residence and no safe alternative to that residence may receive assistance provided by any private nonprofit organization whose primary mission is to provide services to youth aged 24 and under and families headed by youth aged 24 and under.</p> <p>[24 CFR 576.103; 24 CFR 576.401(c); 24 CFR 576.500(b); 24 CFR 576.500(c); 24 CFR 576.500(e); 24 CFR 576.500(f); Sections I.B.1.a and III.E.4.a of Notice CPD-21-08; Grant Agreement]</p>	<input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>N/A</b>
<b>Describe Basis for Conclusion:</b>	

3.

<p><b>Eligibility Criteria (Rapid Re-housing):</b> Did the recipient or its subrecipient document that each program participant who received rapid re-housing assistance was eligible based on:</p> <ul style="list-style-type: none"> <li>a. Meeting the criteria in paragraph (1) of the homeless definition at 24 CFR 576.2 or the alternative criteria noted below; <u>or</u></li> <li>b. Meeting the criteria under category (4) of the homeless definition at 24 CFR 576.2 and living in an emergency shelter or place described in category (1) of the homeless definition at 24 CFR 576.2; <u>or</u></li> <li>c. Meeting the criteria stated in section III.1 of Notice CPD-21-05 if the recipient satisfied the conditions provided in that Notice (see question #4 below)?</li> </ul>	<input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>N/A</b>
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<p>NOTES:</p> <ul style="list-style-type: none"> <li>Section I.B.1.b of Notice CPD-21-08 provided that an individual may qualify as homeless under paragraph (1)(iii) of the homeless definition in 24 CFR 576.2 so long as the individual is exiting an institution where the individual resided for 120 days or less and the individual resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.</li> <li>Consistent with the FY2020 funding conditions made applicable to by section 23003 of the CARES Act and the ESG-CV grant agreement, unaccompanied youth aged 24 and under (or families headed by youth aged 24 and under) who have an unsafe primary nighttime residence and no safe alternative to that residence may receive assistance provided by any private nonprofit organization whose primary mission is to provide services to youth aged 24 and under and families headed by youth aged 24 and under.</li> </ul> <p>[24 CFR 576.104; 24 CFR 576.2; 24 CFR 576.500(b); 24 CFR 576.500(f); Section I.B.1.b of Notice CPD-21-08, Section III.1 of Notice CPD-21-05; Grant Agreement]</p>	
<p><b>Describe Basis for Conclusion:</b></p>	

4.

<p><u>Eligibility Criteria (Notice CPD-21-05 Expanded Rapid Re-housing Eligibility):</u> If ESG rapid re-housing rental assistance was provided to a household that was not homeless at the start of that assistance, do the records reflect that the household met ALL of the following criteria, as provided by the waiver and alternative requirements in Notice CPD-21-05?</p> <p>[Section III.1 of Notice CPD-21-05]</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes   No   N/A</b>
<p>a. Qualified as “homeless” as defined in 24 CFR 576.2 immediately before moving into their current housing;</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes   No   N/A</b>
<p>b. Have been residing in housing with time-limited rental assistance provided under a homeless assistance program (which means assistance limited to or reserved, either federally or locally, for people who are “homeless” as defined in 24 CFR 576.2) other than the ESG program (e.g., time-limited rental assistance that was funded under the Supportive Services for Veteran Families Program or the Coronavirus Relief Fund and provided only to people who qualified as “homeless” as defined in 24 CFR 576.2);</p>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes   No   N/A</b>

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c. Would not have any overlap in rental assistance between the non-ESG program and the ESG program, due to exhaustion or expiration of the non-ESG assistance or program funds;	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>	<input type="checkbox"/> <b>N/A</b>
d. Would not have a gap of more than one month (or equivalent amount of days) between the end of the non-ESG rental assistance and the beginning of their ESG RRH rental assistance; and	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>	<input type="checkbox"/> <b>N/A</b>
e. Do not have the resources or support networks (beyond an eviction moratorium) (e.g., family, friends or other social networks) needed to retain their existing housing without ESG assistance.	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>	<input type="checkbox"/> <b>N/A</b>
<b>Describe Basis for Conclusion:</b>			

5.

Conditions for Notice CPD-21-05 Expanded Rapid Re-housing Eligibility):	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>	<input type="checkbox"/> <b>N/A</b>
[Section III.1 of Notice CPD-21-05]	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>	<input type="checkbox"/> <b>N/A</b>
a. If the recipient expanded the scope of RRH beneficiaries as provided by Notice CPD-21-05, did the recipient amend its consolidated plan to include these newly eligible RRH beneficiaries?	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>	<input type="checkbox"/> <b>N/A</b>
b. If the recipient expanded the scope of the RRH beneficiaries as provided by Notice CPD-21-05, did the recipient either: <ul style="list-style-type: none"> <li>• publish its plan to include the newly eligible RRH beneficiaries, at a minimum, on the Internet at the appropriate Government web site or through other electric media; or</li> <li>• follow the consultation and citizen participation requirements, including the requirements at 24 CFR 91.100, 91.105, 91.110, and or 91.115, as applicable?</li> </ul>	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>	<input type="checkbox"/> <b>N/A</b>
c. If the recipient expanded the scope of RRH beneficiaries to include individuals or families that met the RRH criteria established in Notice CPD-21-05 but were not already ESG RRH program participants, did the recipient account for the new RRH beneficiaries by making corresponding changes as appropriate to the applicable written standards for administering RRH assistance (including beneficiary eligibility and prioritization criteria), HMIS, and procedures for centralized or coordinated assessment, initial evaluation, re-evaluation, and recordkeeping and reporting?	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>	<input type="checkbox"/> <b>N/A</b>
<b>Describe Basis for Conclusion:</b>			

6.

Re-evaluations (Rapid Re-housing/Homelessness Prevention): Do program participant records document that the recipient or its subrecipient re-evaluated program participants' eligibility and the types and amounts of	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>	<input type="checkbox"/> <b>N/A</b>
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<p>assistance the program participant needs not less than once every 6 months for program participants receiving homelessness prevention assistance and not less than once annually for program participants receiving rapid re-housing assistance?</p> <p>[24 CFR 576.401(b)(1); 24 CFR 576.500(f); Section III.F.13.a. and III.F.13.b of Notice CPD-21-08]</p>	
<p><b>Describe Basis for Conclusion:</b></p>	

7.

<p><u>Written Standards:</u></p> <p>[24 CFR 576.400(e)(1); 24 CFR 576.400(e)(2); 24 CFR 576.400(e)(3)(i); 24 CFR 576.400(e)(3)(v); 24 CFR 576.400(e)(3)(vi); 24 CFR 576.400(e)(3)(vii); 24 CFR 576.400(e)(3)(viii); 24 CFR 576.400(e)(3)(ix); 24 CFR 576.500(f); Section III.F.5 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;"> <span>Yes</span> <span>No</span> <span>N/A</span> </div>
<p>a. Did the recipient and/or its subrecipients adopt written standards for the provision of homelessness prevention and rapid re-housing assistance, as required by 24 CFR 576.400(e)(1) and 24 CFR 576.400(e)(2)?</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;"> <span>Yes</span> <span>No</span> <span>N/A</span> </div>
<p>b. Did these written standards cover the following topics (listed in 24 CFR 576.400(e)(3)):</p> <ul style="list-style-type: none"> <li>evaluating individuals' and families' eligibility for assistance under ESG;</li> <li>coordination among emergency shelter providers, essential services providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers;</li> <li>determining and prioritizing which eligible families and individuals would receive homelessness prevention assistance and which eligible families and individuals would receive rapid re-housing assistance;</li> <li>determining what percentage or amount of rent and utilities costs each program participant must pay while receiving homelessness prevention or rapid re-housing assistance;</li> <li>determining how long the program participant will be provided with rental assistance and whether and how the amount of that assistance would be adjusted over time;</li> <li>determining the type, amount, and duration of housing stabilization and/or relocation services to provide to the program participant?</li> </ul>	<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;"> <span>Yes</span> <span>No</span> <span>N/A</span> </div>
<p>c. Do the program participant records show that homelessness prevention and rapid re-housing assistance were provided in accordance with the</p>	<div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> </div>

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applicable written standards except as permitted in the waiver noted below?  <b>NOTE:</b> With respect to 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(e) for the first 60 days of the project's operation.	<b>Yes   No   N/A</b>
<b>Describe Basis for Conclusion:</b>	

8.

<b>Re-evaluations (Rapid Re-housing/Homelessness Prevention):</b> Do program participant records document that each re-evaluation of eligibility established that the program participant:	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes   No   N/A</b>
a. did not have an annual income that exceeds the Very Low-Income limit for the area as established by HUD for HUD's Section 8 and Public Housing Programs at <a href="http://www.huduser.gov/portal/datasets/il.html">www.huduser.gov/portal/datasets/il.html</a> ; and b. lacked sufficient resources and support networks necessary to retain housing without ESG assistance?	
[24 CFR 576.401(b)(1)(ii); 24 CFR 576.500(e); 24 CFR 576.500(f); Section III.F.13 of Notice CPD-21-08]	
<b>Describe Basis for Conclusion:</b>	

9.

<b>Recordkeeping (Ineligibility):</b> For each individual and family determined ineligible to receive ESG assistance, did the recipient or its subrecipient document the reason for that determination?	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes   No   N/A</b>
[24 CFR 576.500(d)]	
<b>Describe Basis for Conclusion:</b>	

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10.

<p><b>Eligible Costs (Homelessness Prevention):</b> Were all homelessness prevention costs eligible and necessary to help the program participant regain stability in the program participant's current housing or to move into other permanent housing and achieve stability in that housing?</p> <p>[24 CFR 576.103; 24 CFR 576.500(f)]</p>	<input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>N/A</b>
<p><b>Describe Basis for Conclusion:</b></p>	

11.

<p><b>Housing Stability Case Management:</b> While providing rapid re-housing or homelessness prevention assistance to a program participant, did the recipient or its subrecipient document in the program participant's file that it developed a plan to assist the program participant to retain permanent housing after the ESG assistance ends, taking into account all relevant considerations, such as the program participant's current or expected income and expenses, other public or private assistance for which the program participant will be eligible and likely to receive; and the relative affordability of available housing in the area?</p> <p>[24 CFR 576.401(e)(2); 24 CFR 576.500(f)]</p>	<input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>N/A</b>
<p><b>Describe Basis for Conclusion:</b></p>	

12.

<p><b>Connections to Mainstream and Other Resources:</b> While providing rapid re-housing or homelessness prevention assistance to program participants, did the recipient or its subrecipients assist each program participant to obtain mainstream and other resources as needed?</p> <p>[24 CFR 576.401(d)(1); 24 CFR 576.401(d)(2); 24 CFR 576.500(f)]</p>	<input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>N/A</b>
<p><b>Describe Basis for Conclusion:</b></p>	

13.

<p><b>Recordkeeping (Program Participant Records):</b> Did each program participant record document:</p> <p style="margin-left: 20px;">a. the services and assistance provided to that program participant, including, as applicable, security deposit, rental assistance, and utility payments made on behalf of the program participant; and</p> <p style="margin-left: 20px;">b. compliance with all applicable requirements for providing services and</p>	<input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>N/A</b>
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assistance to that program participant?	
[24 CFR 576.500(f)]	
<b>Describe Basis for Conclusion:</b>	

14.

<u>Terminating Assistance:</u>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes No N/A</b>
[24 CFR 576.402(a); 24 CFR 576.402(b)]	
a. If the recipient or any of its subrecipients terminated any participants from the program, did they do so in accordance with a formal process established by the recipient or its subrecipient(s) that recognizes the rights of individuals affected, that met the following requirements: <ul style="list-style-type: none"> <li>written notice to the program participant containing a clear statement of the reasons for termination,</li> <li>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) who made or approved the termination decision, and</li> <li>prompt written notice of the final decision to the program participant?</li> </ul>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes No N/A</b>
b. Did the recipient and/or its subrecipient examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases?	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes No N/A</b>
<b>Describe Basis for Conclusion:</b>	

15.

<u>Prohibition on Prerequisite Activities:</u> Did the recipient and subrecipients ensure individuals and families experiencing homelessness were not required to receive treatment or perform any prerequisite activities as a condition for receiving rental assistance or other services provided with ESG-CV funds?	<input type="checkbox"/> <input type="checkbox"/> <b>Yes No</b>
[Section III.F.12 of Notice CPD-21-08]	

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16.

<p><b>Lead-Based Paint:</b> Do records reflect that the recipient and its subrecipient(s) complied with all lead-based paint requirements?</p> <p>NOTE: The HUD reviewer <b>MUST</b> complete the applicable Exhibits in Chapter 24 of this Handbook to answer this question: Exhibit 24-2, Exhibit 24-3, or Exhibit 24-4.</p> <p>[24 CFR 576.403(a); 24 Part 35, Subpart H; 24 CFR Part 35, Subpart K; 24 CFR Part 35, Subpart M]</p>	<input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>N/A</b>
<b>Describe Basis for Conclusion:</b>	

17.

<p><b>Minimum Habitability and Housing Quality Standards:</b> Did the recipient and its subrecipients ensure that all housing units met the minimum habitability standards established in 24 CFR 576.403(c) or Housing Quality Standards (HQS) established under 24 CFR 982.401 before incurring any costs to help program participants remain in or move into those housing units except for:</p> <ul style="list-style-type: none"> <li>• the provision of Homelessness Prevention housing relocation and stabilization services under 24 CFR 576.105(b) to help individuals and families remain in their existing housing or move into new housing; and</li> <li>• recipients who chose to serve individuals and families made eligible for RRH assistance in Section III.1 of Notice CPD-21-05 and satisfied the conditions in Section III.2.a-c of that Notice (see question 16 below, which evaluates whether the recipient or subrecipient met the conditions from Section III.2.a-c of Notice CPD-21-05)?</li> </ul> <p>NOTE: Notice CPD-21-05 waived the requirements at 24 CFR 576.403(c), permitting recipients or subrecipients to provide rental assistance and housing relocation and stabilization services without first inspecting the unit so long as the conditions of Notice CPD-21-05 are met (see Section III.2.a-c).</p> <p>[24 CFR 576.403(c); 24 CFR 576.500(j); Sections III.F.7.c and III.F.14 of Notice CPD-21-08; Section III.2.a-c of Notice CPD-21-05]</p>	<input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>N/A</b>
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18.

<p><b>Minimum Habitability and Housing Quality Standards:</b> If the recipient elected to provide RRH assistance to individuals and families made eligible for RRH assistance only through Section III.1 of Notice CPD-21-05, did the recipient or subrecipient first determine each household's unit met the habitability standards in 24 CFR 576.403(c) or satisfy one of the following conditions for assisting these households without first determining their units met those habitability standards?</p> <p>a. The recipient or subrecipient maintained documentation showing the prior rental assistance provider determined that the housing met: (a) the habitability standards at 24 CFR 576.403(c); or (b) the Housing Quality Standards (HQS) established at 24 CFR 982.401; <b><u>or</u></b></p> <p>b. The recipient or subrecipient provided no more than 90 days of RRH assistance to the program participant; <b><u>or</u></b></p> <p>c. The recipient or subrecipient conducted an inspection within the first 90 days and determines that the housing meets habitability standards established at 24 CFR 576.403(c) or the HQS established at 24 CFR 982.401.</p> <p>[24 CFR 576.403; Section III.2.a-c of Notice CPD-21-05]</p>	<input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>N/A</b>
<b>Describe Basis for Conclusion:</b>	

19.

<p><b>Conflicts of Interest (Organizational):</b> Did the recipient and its subrecipients ensure that:</p> <p>a. no type or amount of ESG assistance, except for Sponsor-Based Rental Assistance, was conditioned on an individual or family's acceptance of housing owned by the recipient, subrecipient, contractor, parent, or subsidiary of the subrecipient; and</p> <p>b. no subrecipient carried out the initial evaluation under 24 CFR 576.401, or administered homelessness prevention assistance, with respect to individuals and families occupying housing owned by that subrecipient or any of its parent or subsidiary organizations?</p> <p>[24 CFR 576.404(a); Section III.E.3.o(v) of Notice CPD-21-08]</p>	<input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>N/A</b>
<b>Describe Basis for Conclusion:</b>	

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**B. HOUSING RELOCATION AND STABILIZATION SERVICES**

Financial Assistance Costs: If the recipient has not expended ESG funds on Financial Assistance costs, check the N/A boxes and skip to the Services Costs subsection of this Exhibit.

20.

<p><u>Financial Assistance Costs:</u> Did the recipient and its subrecipients ensure that:</p> <p>a. no program participant received financial assistance under 24 CFR 576.105(a) that was of the same type of assistance that the program participant was receiving through other public sources; and</p> <p>b. no program participant who received replacement housing payments under the Uniform Relocation Assistance and Real Property Acquisition Act (URA) received financial assistance under 24 CFR 576.105(a) during the period of time covered by the URA payments?</p> <p>[24 CFR 576.105(d)]</p>	<table style="margin: auto;"><tr><td><input type="checkbox"/></td><td><input type="checkbox"/></td><td><input type="checkbox"/></td></tr><tr><td><b>Yes</b></td><td><b>No</b></td><td><b>N/A</b></td></tr></table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
<b>Yes</b>	<b>No</b>	<b>N/A</b>					
<p><b>Describe Basis for Conclusion:</b></p>							

21.

<p><u>Financial Assistance Costs:</u> Were eligible costs listed in 24 CFR 576.105(a) paid only to a housing owner, utility company, or other third party (not directly to the program participant)?</p> <p>NOTE: The term “owner” includes both the sponsor, where the program participant is assisted through sponsor-based rental assistance (SBRA), as provided by section III.E.3.o(vi) of Notice CPD-21-08, and the primary leaseholder, where the program participant has subleased the unit from another tenant, as provided by section III.E.4.j of Notice CPD-21-08.</p> <p>[24 CFR 576.105(a); Sections III.E.4.j and III.E.3.o(vi) of Notice CPD-21-08]</p>	<table style="margin: auto;"><tr><td><input type="checkbox"/></td><td><input type="checkbox"/></td><td><input type="checkbox"/></td></tr><tr><td><b>Yes</b></td><td><b>No</b></td><td><b>N/A</b></td></tr></table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
<b>Yes</b>	<b>No</b>	<b>N/A</b>					
<p><b>Describe Basis for Conclusion:</b></p>							

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22.

<p><b>Financial Assistance Costs (Rental Housing Application Fees):</b> Were rental housing application fees paid for with ESG funds a standard charge issued by the owner to all applicants?</p> <p>NOTE: The term “owner” includes both the sponsor, where the program participant is assisted through sponsor-based rental assistance (SBRA), as provided by section III.E.3.o(vi) of Notice CPD-21-08, and the primary leaseholder, where the program participant has subleased the unit from another tenant, as provided by section III.E.4.j of Notice CPD-21-08.</p> <p>[24 CFR 576.105(a)(1); Sections III.E.4.j and III.E.3.o(vi) 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;"> <span>Yes</span> <span>No</span> <span>N/A</span> </div>
<p><b>Describe Basis for Conclusion:</b></p>	

23.

<p><b>Financial Assistance Costs (Security Deposits):</b> Aside from security deposit amounts provided as landlord incentives (which should be examined using questions 52 and 53 below), were security deposits paid for with ESG funds equal to no more than 2 months’ rent?</p> <p>[24 CFR 576.105(a)(2)]</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;"> <span>Yes</span> <span>No</span> <span>N/A</span> </div>
<p><b>Describe Basis for Conclusion:</b></p>	

24.

<p><b>Financial Assistance Costs (Last Month’s Rent):</b> Were costs for the last month’s rent paid for with ESG funds:</p> <ol style="list-style-type: none"> <li>a. necessary to obtain housing for a program participant;</li> <li>b. paid to the owner of the housing at the time the owner was paid the security deposit and first month’s rent;</li> <li>c. less than or equal to one month’s rent; <u>and</u></li> <li>d. included in calculating the program participant’s total rental assistance?</li> </ol> <p>NOTE: The term “owner” includes both the sponsor, where the program participant is assisted through sponsor-based rental assistance (SBRA), as provided by Section III.E.3.o(vi) of Notice CPD-21-08, and the primary leaseholder, where the program participant has subleased the unit from another tenant, as provided by Section III.E.4.j 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;"> <span>Yes</span> <span>No</span> <span>N/A</span> </div>
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[24 CFR 576.105(a)(3); Sections III.E.4.j and III.E.3.o(vi) of Notice CPD-21-08]	
<b>Describe Basis for Conclusion:</b>	

25.

<u>Financial Assistance Costs (Utility Deposits)</u> : Were utility deposits paid for with ESG funds only for eligible types of utility services (gas, electric, water, and sewage) and required by the utility company for all customers?	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes    No    N/A</b>
[24 CFR 576.105(a)(4)]	
<b>Describe Basis for Conclusion:</b>	

26.

<u>Financial Assistance Costs (Utility Payments)</u> : Were utility payments paid for with ESG funds:	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes    No    N/A</b>
a. within the limit of 24 months of utility payments per program participant, per service, including up to 6 months of utility payments in arrears, per service;	
b. only provided when the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments; <u>and</u>	
c. only for eligible types of utility services (gas, electric, water, and sewage)?	
[24 CFR 576.105(a)(5)]	
<b>Describe Basis for Conclusion:</b>	

27.

<u>Financial Assistance Costs (Moving Costs)</u> : Were moving costs paid for with ESG funds only for moving-related activities such as truck rental, hiring a moving company, and allowable temporary storage fees (up to 3 months, fees accrued after the date the program participant began receiving services and before the program participant moves into permanent housing, and excluding storage fees in arrears)?	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <b>Yes    No    N/A</b>
[24 CFR 576.105(a)(6)]	

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**Describe Basis for Conclusion:**

Services Costs: If the recipient has not expended ESG funds on Services costs, check the N/A boxes and skip to the Short- and Medium-Term Rental Assistance section of this Exhibit (Section C).

28.

<b>Services Costs (Housing Search and Placement):</b> Were housing search and placement costs paid for with ESG funds: a. necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing; and b. one of those listed in 24 CFR 576.105(b)(1)(i)-(viii)?  [24 CFR 576.105(b)(1)]	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>	<input type="checkbox"/> <b>N/A</b>
<b>Describe Basis for Conclusion:</b>			

29.

<b>Services Costs (Housing Stability Case Management):</b> Were the activities paid for with ESG funds: a. one of those listed in 24 CFR 576.105(b)(2)(A)-(H), and b. for the purposes of assessing, arranging, coordinating, or monitoring the delivery of individualized services to: <ul style="list-style-type: none"><li>• facilitate housing stability for a program participant who resides in permanent housing; or</li><li>• to assist a program participant in overcoming immediate barriers to obtaining housing?</li></ul> [24 CFR 576.105(b)(2)(A)-(H)]	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>	<input type="checkbox"/> <b>N/A</b>
<b>Describe Basis for Conclusion:</b>			

30.

<b>Services Costs (Housing Stability Case Management):</b> With respect to housing stability case management provided to program participants who were not living in permanent housing, were ESG-CV funds used to provide only up to 60 days of housing stability case management while the program participant was seeking housing?  [24 CFR 576.105(b)(2); Section III.E.4.f of Notice CPD-21-08]	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>	<input type="checkbox"/> <b>N/A</b>
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<b>Describe Basis for Conclusion:</b>
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31.

<p><b>Services Costs (Mediation Costs):</b> Were mediation costs paid for with ESG funds necessary to prevent the program participant from losing permanent housing in which the program participant currently resides, and used for mediation between the program participant and the owner or person(s) with whom the participant is living?</p> <p>[24 CFR 576.105(b)(3)]</p>	<input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>N/A</b>
<b>Describe Basis for Conclusion:</b>	

32.

<p><b>Services Costs (Legal Services):</b> Did the recipient and its subrecipients ensure that the legal services costs paid for with ESG funds consisted only of the following types of costs:</p> <ul style="list-style-type: none"> <li>a. for either: hourly fees for legal advice and representation by attorneys licensed and in good standing with the bar association of the State in which the services are provided, or by person(s) under the supervision of the licensed attorney; or fees based on the actual service performed (i.e., fee for service), where the recipient/ subrecipient documented that such costs were less than what the cost of hourly fees would have been;</li> <li>b. for filing fees and other necessary court costs;</li> <li>c. subrecipients' employees' salaries and other costs necessary to perform the services (if the subrecipient is a legal services provider and performs the services itself); and</li> <li>d. for the following component services: <ul style="list-style-type: none"> <li>• client intake;</li> <li>• preparation of cases for trial;</li> <li>• provision of legal advice;</li> <li>• representation at hearings;</li> <li>• counseling?</li> </ul> </li> </ul> <p>[24 CFR 576.102(a)(1)(vi)(A); 24 CFR 576.102(a)(1)(vi)(D); 24 CFR 576.102(a)(1)(vi)(E); 24 CFR 576.105(b)(4)]</p>	<input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>N/A</b>
<b>Describe Basis for Conclusion:</b>	



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33.

<p><b>Services Costs (Legal Services):</b> Did the recipient and its subrecipients ensure that the legal services costs paid for with ESG funds were only used:</p> <p>a. to the extent necessary to resolve a legal problem that prohibits the program participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which they currently reside;</p> <p>b. for the following subject matters:</p> <ul style="list-style-type: none"> <li>• landlord/tenant matters;</li> <li>• child support;</li> <li>• guardianship;</li> <li>• paternity;</li> <li>• emancipation;</li> <li>• legal separation;</li> <li>• orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking;</li> <li>• appeal of veterans and public benefit claim denials; and</li> <li>• the resolution of outstanding criminal warrants; and</li> </ul> <p>c. to the extent that other appropriate legal services were unavailable or inaccessible in the community?</p> <p>[24 CFR 576.105(b)(4); 24 CFR 576.102(a)(1)(vi)(B); 24 CFR 576.102(a)(1)(vi)(C)]</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;"> <span>Yes</span> <span>No</span> <span>N/A</span> </div>
<p><b>Describe Basis for Conclusion:</b></p>	

34.

<p><b>Services Costs (Credit Repair):</b> Were credit repair costs paid for with ESG funds for counseling or other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, or resolving personal credit problems?</p> <p>[24 CFR 576.105(b)(5)]</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;"> <span>Yes</span> <span>No</span> <span>N/A</span> </div>
<p><b>Describe Basis for Conclusion:</b></p>	

35.

<p><b>Services Costs (Credit Repair):</b> Did credit repair costs paid for with ESG funds exclude the payment or modification of a debt?</p> <p>[24 CFR 576.105(b)(5)]</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;"> <span>Yes</span> <span>No</span> <span>N/A</span> </div>
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<b>Describe Basis for Conclusion:</b>
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**C. SHORT- AND MEDIUM-TERM RENTAL ASSISTANCE**

General Requirements: If the recipient has not expended ESG funds on Short- or Medium-Term Rental Assistance, check the N/A boxes and skip to the next section.

36.

<p><b>Rental Assistance (Use with Other Subsidies):</b> Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, did the provision of rental assistance exclude:</p> <ul style="list-style-type: none"> <li>a. program participants who were receiving tenant-based rental assistance or living in a housing unit receiving project-based rental assistance or sponsor-based rental assistance or operating assistance through other public sources; and</li> <li>b. program participants who were provided with replacement housing payments under the URA during the period of time covered by the URA payments?</li> </ul> <p>[For TBRA, PBRA, SBRA and subleases: 24 CFR 576.106(c); For SBRA: Section III.E.3.o(vi) of Notice CPD-21-08 For subleases: Section III.E.4.j of Notice CPD-21-08]</p>	<table style="margin: auto;"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td><b>Yes</b></td> <td><b>No</b></td> <td><b>N/A</b></td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
<b>Yes</b>	<b>No</b>	<b>N/A</b>					
<p><b>Describe Basis for Conclusion:</b></p> <div style="height: 40px;"></div>							

37.

<p><b>Rental Assistance (Rent Reasonableness):</b> Did the recipient and its subrecipients ensure that ESG rental assistance was only provided to units for which the rent complied with HUD's standard of rent reasonableness?</p> <p><b>NOTE:</b> For this purpose, rent equals the sum of the total monthly rent for the unit, any fees required for occupancy under the lease or sublease (other than late fees and pet fees) and, if the tenant paid separately for utilities, the monthly allowance for utilities (excluding telephone) established by the public housing authority for the area in which the housing is located.</p> <p>[For TBRA, PBRA, SBRA, and subleases: 24 CFR 576.106(d)(1); 24 CFR 576.106(d)(2); 24 CFR 576.500(i); Section III.E.4.b(i) of Notice CPD-21-08 For SBRA: Section III.E.3.o(vi) of Notice CPD-21-08 For subleases: Section III.E.4.j of Notice CPD-21-08]</p>	<table style="margin: auto;"> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td><b>Yes</b></td> <td><b>No</b></td> <td><b>N/A</b></td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
<b>Yes</b>	<b>No</b>	<b>N/A</b>					

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<b>Describe Basis for Conclusion:</b>
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38.

<u>Rental Assistance (Rental Assistance Agreement):</u>	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>	<input type="checkbox"/> <b>N/A</b>
<p>a. For TBRA and PBRA: Does the documentation show that the recipient or its subrecipients entered into a rental assistance agreement with each owner before providing the owner with rental assistance payments, including rental arrears?</p> <p>NOTE: The term “owner” includes the primary leaseholder, where the program participant has subleased the unit from another tenant, as provided by Section III.E.4.j of Notice CPD-21-08.</p> <p>[24 CFR 576.106(e); 24 CFR 576.500(h); Section III.E.4.j of Notice CPD-21-08 (for subleases)]</p>	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>	<input type="checkbox"/> <b>N/A</b>
<p>b. For Sponsor-based Rental Assistance (SBRA): Does the documentation show the recipient or its subrecipients entered into a rental assistance agreement with a separate government agency, instrumentality, or nonprofit organization (“sponsor”) to subsidize the rent of program participants who are referred to be housed in units owned or leased by the sponsor?</p> <p>[Section III.E.3.o(ii) of Notice CPD-21-08]</p>	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>	<input type="checkbox"/> <b>N/A</b>
<b>Describe Basis for Conclusion:</b>			

39.

<u>Rental Assistance (Rental Assistance Agreement):</u> Did each rental assistance agreement:	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>	<input type="checkbox"/> <b>N/A</b>
<p>a. set forth the terms under which rental assistance will be provided, including the requirements that apply under 24 CFR 576.106;</p> <p>b. provide that, during the term of the agreement, the owner must give the recipient or its subrecipient a copy of any notice to the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program participant;</p> <p>c. contain the same payment due date, grace period, and late payment penalty requirements as the program participant’s lease; and</p> <p>d. (for Sponsor-Based Rental Assistance) commit ESG funding to be</p>			

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<p>expended or otherwise provide assistance only within the applicable period of performance for the funding?</p> <p>NOTE: The term “owner” includes both the sponsor, where the program participant is assisted through sponsor-based rental assistance (SBRA), as provided by Section III.E.3.o(vi) of Notice CPD-21-08, and the primary leaseholder, where the program participant has subleased the unit from another tenant, as provided by Section III.E.4.j of Notice CPD-21-08.</p> <p>[For TBRA or PBRA: 24 CFR 576.106(e); 24 CFR 576.106(f); For SBRA: 24 CFR 576.106(e); 24 CFR 576.106(f); Sections III.E.3.o(ii) and (vi) of Notice CPD-21-08; For subleases: 24 CFR 576.106(e); 24 CFR 576.106(f); Section III.E.4.j of Notice CPD-21-08]</p>	
<p><b>Describe Basis for Conclusion:</b></p>	

40.

<p><u>Rental Assistance (Payments)</u>: Did the recipient or its subrecipient make timely payments to each owner in accordance with the rental assistance agreement?</p> <p>NOTE: The term “owner” includes both the sponsor, where the program participant is assisted through sponsor-based rental assistance (SBRA), as provided by Section III.E.3.o(vi) of Notice CPD-21-08, and the primary leaseholder, where the program participant has subleased the unit from another tenant, as provided by Section III.E.4.j of Notice CPD-21-08.</p> <p>[For TBRA, PBRA, SBRA, and subleases: 24 CFR 576.106(f); For SBRA: Section III.E.3.o(vi) of Notice CPD-21-08 For subleases: Section III.E.4.j 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;"> <span>Yes</span> <span>No</span> <span>N/A</span> </div>
<p><b>Describe Basis for Conclusion:</b></p>	

41.

<p><u>Rental Assistance (Payments)</u>: Did the recipient and its subrecipients pay any late payment penalties that they incurred only with <u>non-ESG funds</u> (i.e., no ESG funds were used to pay late payment penalties incurred by the recipient or subrecipient)?</p> <p>[For TBRA, PBRA, SBRA, and subleases: 24 CFR 576.106(f); For SBRA: Section III.E.3.o(vi) 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;"> <span>Yes</span> <span>No</span> <span>N/A</span> </div>
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For subleases: Section III.E.4.j of Notice CPD-21-08]	
<b>Describe Basis for Conclusion:</b>	

42.

<p><b>Rental Assistance (Leases or Subleases):</b></p> <p>a. (TBRA and PBRA) Does each program participant receiving rental assistance have a file that contains a legally binding, written lease between the program participant and the owner of the property or his/her agent for the rental unit; OR</p> <p>b. (SBRA) Does each program participant receiving rental assistance have a file that contains a legally binding, written lease or sublease between the program participant and the sponsor for the sponsored unit in which the program participant will reside; OR</p> <p>c. If the assistance was solely for rental arrears for a program participant who had an oral lease agreement in place:</p> <ul style="list-style-type: none"> <li>does each agreement give the program participant an enforceable leasehold interest under state law; and</li> <li>are the agreement and rent owed sufficiently documented by the owner's financial records, rent ledgers, or canceled checks?</li> </ul> <p>NOTE: If the recipient used the waiver in section III.E.4.j of Notice CPD-21-08 to provide rental assistance for a program participant chooses to rent a unit through a legally valid sublease with the primary leaseholder for the unit, the monitor should apply the questions above by substituting "primary leaseholder" for "owner" and substituting "sublease" for "lease."</p> <p>[For TBRA: 24 CFR 576.106(g); 24 CFR 576.500(h) For PBRA: 24 CFR 576.106(g); 24 CFR 576.500(h); For SBRA: 24 CFR 576.106(g); 24 CFR 576.500(h); Section III.E.3.o(vi) of Notice CPD-21-08 For subleases: 24 CFR 576.106(g); 24 CFR 576.500(h); Section III.E.4.j of Notice CPD-21-08]</p>	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td style="text-align: center;"><b>Yes</b></td> <td style="text-align: center;"><b>No</b></td> <td style="text-align: center;"><b>N/A</b></td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
<b>Yes</b>	<b>No</b>	<b>N/A</b>					
<b>Describe Basis for Conclusion:</b>							

43.

<p><b>Rental Assistance (Rental Arrears):</b> Were the rental arrears paid for with ESG funds one-time payments that did not exceed 6 months of rent in arrears (including any late fees on those arrears)?</p>	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td style="text-align: center;"><b>Yes</b></td> <td style="text-align: center;"><b>No</b></td> <td style="text-align: center;"><b>N/A</b></td> </tr> </table>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>					
<b>Yes</b>	<b>No</b>	<b>N/A</b>					

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[24 CFR 576.106(a)(3)]	
<b>Describe Basis for Conclusion:</b>	

44.

<p><b>Recordkeeping (Homelessness Prevention and Rapid Re-housing):</b> Did the recipient or its subrecipient keep records, including copies of documentation of payments made to owners for rental assistance provided, and supporting documentation for these payments, including dates of occupancy by program participants?</p> <p>NOTE: The term “owner” includes both the sponsor, where the program participant is assisted through sponsor-based rental assistance (SBRA), as provided by Section III.E.3.o(vi) of Notice CPD-21-08, and the primary leaseholder, where the program participant has subleased the unit from another tenant, as provided by Section III.E.4.j of Notice CPD-21-08.</p> <p>[For TBRA, PBRA, SBRA, and subleases: 24 CFR 576.500(h); For SBRA: Section III.E.3.o(vi) of Notice CPD-21-08 For subleases: Section III.E.4.j 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;"> <span>Yes</span> <span>No</span> <span>N/A</span> </div>
<b>Describe Basis for Conclusion:</b>	

45.

<p><b>Rental Assistance (TBRA):</b> For tenant-based rental assistance, did the recipient and its subrecipients terminate the rental assistance agreement with the owner and stop providing rental assistance payments under that agreement when any of the following conditions were met:</p> <ul style="list-style-type: none"> <li>a. the program participant moved out of the unit for which the program participant has a lease;</li> <li>b. the lease terminated and was not renewed; or</li> <li>c. the program participant became ineligible to receive ESG assistance?</li> </ul> <p>NOTE: The term “owner” includes the primary leaseholder, where the program participant has subleased the unit from another tenant, as provided by Section III.E.4.j of Notice CPD-21-08.</p> <p>[For TBRA and subleases: 24 CFR 576.106(h)(3)(i)-(iii); For subleases: Section III.E.4.j 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;"> <span>Yes</span> <span>No</span> <span>N/A</span> </div>
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**Describe Basis for Conclusion:**

Project-Based Rental Assistance (PBRA) and Sponsor-Based Rental Assistance (SBRA): If the recipient has not expended funds on PBRA, check the N/A boxes. This is the final subsection of the Exhibit.

46.

<p><u>Rental Assistance (Project-based Rental Assistance and Sponsor-based Rental Assistance):</u> If the recipient or any of its subrecipients used ESG funds to pay the rent for a project-based unit before a program participant moved into the unit, does the program participant file reflect that:</p> <ul style="list-style-type: none"> <li>a. the program participant signed a lease and moved into the unit before the end of the month for which the first month's rent was paid; and</li> <li>b. the amount paid was less than or equal to the rent to be charged under the program participant's lease; and</li> <li>c. unless the program participant moves in during the last half of the month that is paid, the payment was included when determining that program participant's total rental assistance?</li> </ul> <p>[For PBRA: 24 CFR 576.106(i)(2); Section III.E.4.b(ii) of Notice CPD-21-08 For SBRA: Section III.E.3.o(iii) and (vi) of Notice CPD-21-08]</p>	<input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>N/A</b>
<p><b>Describe Basis for Conclusion:</b></p>	

47.

<p><u>Rental Assistance (PBRA and SBRA):</u> Did the recipient and its subrecipients make rental assistance payments to the owner or sponsor only:</p> <ul style="list-style-type: none"> <li>a. for each whole or partial month when a unit was leased or subleased to a program participant, and</li> <li>b. if a program participant moved out of a sponsored unit before expiration of the rental assistance agreement, to cover up to 100 percent of the rent for the unit for up to 30 days from the end of the month in which the unit was vacated?</li> </ul> <p>[For PBRA: 24 CFR 576.106(i)(3); Section III.E.4.b.(ii) of Notice CPD-21-08 For SBRA: Sections III.E.3.o(iv) and (vi) of Notice CPD-21-08]</p>	<input type="checkbox"/> <b>Yes</b> <input type="checkbox"/> <b>No</b> <input type="checkbox"/> <b>N/A</b>
<p><b>Describe Basis for Conclusion:</b></p>	

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48.

<b>Rental Assistance (PBRA):</b> For program participants living in housing with PBRA, does the program participant's file contain a lease with an initial term of at least 1 year AND did the recipient or its subrecipient (whoever signed the agreement) enter into a rental assistance agreement with the owner for an initial term of 1 year?  [24 CFR 576.106(g); 24 CFR 576.106(i)(5)]	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> <b>Yes</b></div><div><input type="checkbox"/> <b>No</b></div><div><input type="checkbox"/> <b>N/A</b></div></div>
<b>Describe Basis for Conclusion:</b>   	

49.

<b>Rental Assistance (PBRA and SBRA):</b> If a program participant was determined ineligible during re-evaluation, did the recipient or its subrecipient suspend or terminate the rental assistance payments for the unit?  [For PBRA: 24 CFR 576.106(i)(4) For SBRA: Section III.E.3.o(iv) of Notice CPD-21-08]	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> <b>Yes</b></div><div><input type="checkbox"/> <b>No</b></div><div><input type="checkbox"/> <b>N/A</b></div></div>
<b>Describe Basis for Conclusion:</b>   	

50.

<b>Rental Assistance (PBRA):</b> Did the recipient and its subrecipients ensure that the term of occupancy in each program participant's lease was not conditioned on the provision of rental assistance payments, and if ESG-funded rental assistance was suspended, was the program participant allowed to remain in the unit as permitted under the lease or sublease?  [24 CFR 576.106(i)(4)]	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> <b>Yes</b></div><div><input type="checkbox"/> <b>No</b></div><div><input type="checkbox"/> <b>N/A</b></div></div>
<b>Describe Basis for Conclusion:</b>   	

**D. ADDITIONAL ELIGIBLE ACTIVITIES**

51.

<b>Hazard Pay:</b> 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"/> <b>Yes</b></div><div><input type="checkbox"/> <b>No</b></div><div><input type="checkbox"/> <b>N/A</b></div></div>
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<b>Describe Basis for Conclusion:</b>
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52.

<u><b>Landlord Incentives:</b></u> If funds were used for landlord incentive costs, did the recipient determine and document that each cost was reasonable under the program participant's particular circumstances, and not more than was necessary to house the program participant?  [Section III.E.3.e of Notice CPD-21-08]	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> <b>Yes</b></div><div><input type="checkbox"/> <b>No</b></div><div><input type="checkbox"/> <b>N/A</b></div></div>
<b>Describe Basis for Conclusion:</b>	

53.

<u><b>Landlord Incentives:</b></u> Were ESG-CV funds used to pay for landlord incentives limited to the following costs in an amount not to exceed three times the rent charged for the unit: a. Signing bonuses equal to up to 2 months of rent; b. Security deposits equal to up to 3 months of rent (these are separate from the costs of security deposits under 24 CFR 576.105(a) and, therefore, does not factor into the cap established in that section); c. Paying the cost to repair damages incurred by the program participant not covered by the security deposit or that are incurred while the program participant is still residing in the unit; and d. Paying the costs of extra cleaning or maintenance of a program participant's unit or appliances.  [Section III.E.3.e of Notice CPD-21-08]	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> <b>Yes</b></div><div><input type="checkbox"/> <b>No</b></div><div><input type="checkbox"/> <b>N/A</b></div></div>
<b>Describe Basis for Conclusion:</b>	

54.

<u><b>Volunteer Incentives:</b></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 essential services or housing relocation and stabilization 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"/> <b>Yes</b></div><div><input type="checkbox"/> <b>No</b></div><div><input type="checkbox"/> <b>N/A</b></div></div>
<b>Describe Basis for Conclusion:</b>	

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55.

<p><b>Cell Phones:</b> If ESG-CV funds were used for the costs of providing cell phones, was the cell phone:</p> <ul style="list-style-type: none"> <li>Owned by the recipient/subrecipient and loaned to individuals and families experiencing homelessness?</li> <li>Needed to enable program participants to participate in activities necessary to obtain or maintain housing?</li> <li>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).</li> </ul> <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;"> <span>Yes</span> <span>No</span> <span>N/A</span> </div>
<p><b>Describe Basis for Conclusion:</b></p>	

56.

<p><b>Personal Protective Equipment (PPE):</b> Were ESG-CV funds used to buy PPE (such as masks, disposable gloves, and hand sanitizer) for program participants receiving homelessness prevention and rapid re-housing assistance to the extent the program participant needs the PPE to avoid exposure to and prevent the spread of coronavirus (e.g., to go out in public or enter common areas of housing)?</p> <p>[Section III.E.3.h 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;"> <span>Yes</span> <span>No</span> <span>N/A</span> </div>
<p><b>Describe Basis for Conclusion:</b></p>	

57.

<p><b>Furniture and Household Furnishings:</b> If ESG-CV funds were used to buy furniture or household furnishings for use by program participants while receiving homelessness prevention or rapid re-housing assistance:</p> <ol style="list-style-type: none"> <li>were the costs necessary to help program participants obtain and maintain housing; and</li> <li>did the recipient and its subrecipients comply with the requirements for equipment at 2 CFR 200.313, including the disposition requirements included in paragraph (e) of that section?</li> </ol> <p>[2 CFR 200.313; Section III.E.3.i 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;"> <span>Yes</span> <span>No</span> <span>N/A</span> </div>
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**Describe Basis for Conclusion:**

58.

<u>Essential Services for Individuals and Families Receiving Rapid Re-housing and Homelessness Prevention Assistance</u> : If funds were used to provide essential services established at 24 CFR 576.102(a)(1) to program participants receiving rapid rehousing and homelessness prevention assistance, were the costs necessary to assist those program participants to obtain and maintain housing?	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>	<input type="checkbox"/> <b>N/A</b>
[Section III.E.3.j of Notice CPD-21-08]			
<b>Describe Basis for Conclusion:</b>			

59.

<u>Renters Insurance</u> : If ESG-CV funds were used to pay for renters insurance for program participants, did the recipient or subrecipient: a. demonstrate the payment of renters insurance is necessary to obtain or maintain housing (e.g., the landlord requires renters to have renters insurance to reside in the unit); and b. pay the renters insurance directly to the insurance company on behalf of the program participant.	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>	<input type="checkbox"/> <b>N/A</b>
[Section III.E.3.l of Notice CPD-21-08]			
<b>Describe Basis for Conclusion:</b>			

60.

<u>Vaccine Incentives</u> : If ESG-CV funds were used to make direct, cash payments as an incentive for receiving the coronavirus vaccine, were the payments provided: a. only in amounts not exceeding \$50 per dose; b. only to people experiencing homelessness; and c. only to the extent that other vaccine incentives were inaccessible or unavailable to people experiencing homelessness within the community?	<input type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>	<input type="checkbox"/> <b>N/A</b>
[Section III.E.3.m of Notice CPD-21-08]			
<b>Describe Basis for Conclusion:</b>			

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E. EQUAL ACCESS

61.

<p>Did each subrecipient 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, the individual's own self-identified gender identity will govern.</p> <p>[24 CFR 5.106(b) and 5.106(d)]</p>	<div style="display: flex; justify-content: space-around; align-items: center;"><div><input type="checkbox"/> <b>Yes</b></div><div><input type="checkbox"/> <b>No</b></div></div>
<p><b>Describe Basis for Conclusion:</b></p>	

62.

<p>Did each subrecipient 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>NOTE:</p> <ul style="list-style-type: none"><li>• 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.</li><li>• 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.</li></ul> <p>[24 CFR 5.106(b)(3) and 5.106(d)]</p>	<div style="display: flex; justify-content: space-around; align-items: center;"><div><input type="checkbox"/> <b>Yes</b></div><div><input type="checkbox"/> <b>No</b></div></div>
<p><b>Describe Basis for Conclusion:</b></p>	

F. VIOLENCE AGAINST WOMEN ACT

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63.

<p>If the recipient is a state, did it require its subrecipients that administer rental assistance to develop emergency transfer plan(s) for victims of domestic violence, dating violence, sexual assault, or stalking? If the recipient is not a state, did it develop an emergency transfer plan for victims of domestic violence, dating violence, sexual assault, or stalking?</p> <p>[24 CFR 576.409(d)]</p>	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> <b>Yes</b></div><div><input type="checkbox"/> <b>No</b></div><div><input type="checkbox"/> <b>N/A</b></div></div>
<p><b>Describe Basis for Conclusion:</b></p>	

64.

<p>Does the rental assistance agreement between the recipient or subrecipient and the owner of the housing include all protections that apply to tenants and applicants under 24 CFR part 5, subpart L, as supplemented by 24 CFR 576.409, except for the emergency transfer plan requirements under 24 CFR 5.2005(e) and 24 CFR 576.409(d) for at least the length of time the rental assistance is provided on behalf of the program participant.</p> <p>[24 CFR 576.106(e); 24 CFR 576.409(d)]</p>	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> <b>Yes</b></div><div><input type="checkbox"/> <b>No</b></div><div><input type="checkbox"/> <b>N/A</b></div></div>
<p><b>Describe Basis for Conclusion:</b></p>	

65.

<p>Does each lease that was executed by a program participant receiving rental assistance include or incorporate by reference all of the requirements that apply to tenants, the owner, or leases under 24 CFR part 5, subpart L (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), as supplemented by 24 CFR 576.409, including the prohibited bases for eviction and restrictions on construing lease terms under 24 CFR 5.2005(b) and (c).</p> <p>[24 CFR 576.106(g); 24 CFR 576.409; 24 CFR Part 5, Subpart L]</p>	<div style="display: flex; justify-content: space-around;"><div><input type="checkbox"/> <b>Yes</b></div><div><input type="checkbox"/> <b>No</b></div><div><input type="checkbox"/> <b>N/A</b></div></div>
<p><b>Describe Basis for Conclusion:</b></p>	