

THDA's ESG Emergency Shelter Training

MARCH 2026

Emergency Shelter Overview

- Emergency shelter means any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements.
- Both day shelters and overnight shelters are considered Emergency Shelter under ESG but must serve qualifying populations of homelessness as defined by HUD.
- Where ESG funds are used solely for essential services or shelter operations under the Emergency Shelter component, services or shelter must be provided to homeless individuals and families at least for the period during which the ESG funds are provided.
 - In the case of a seasonal shelter, this could be based on the contract period specified in the grantee contract.

ESG Compliance Schedule

- Your 2025 project will be monitored by THDA's Compliance and Asset Management (CAM) Team.
- This training will provide an overview of shelter compliance requirements and documentation for ESG client files but is not an exhaustive list of recordkeeping items.
- Set Asides and Non-profit Grantees are responsible for internal controls that support ESG compliance.
- Electronic copies of records are permitted but Grantee must be able to produce evidence of those records for monitoring purposes as cited in ["Can the records for ESG be retained in an electronic format or must hard copy" on the HUD Exchange](#).

Obligations of ESG Emergency Shelter Providers

- If you operate or oversee an ESG-funded emergency shelter, federal law requires you to:
 - ✓ Comply with Fair Housing Act, Equal Access Rule, Section 504/ADA Accessibility and Limited English Proficiency (LEP) Access
 - ✓ Follow “Equal Participation of Faith-Based Organizations” as applicable
 - ✓ Use coordinated entry and the standardized assessment established by the CoC
 - ✓ Enter client data into HMIS or a comparable database for DV or legal service providers
 - ✓ Maintain habitability, safety, Lead-Based Paint requirements and accessibility standards for all shelter locations
 - ✓ Serve only people who meet one of HUD’s homeless definitions
 - ✓ Reimburse only allowable activities under ESG Emergency Shelter services
 - ✓ Document eligibility, services, and costs provided under ESG Emergency Shelter for each participant
 - ✓ Follow termination protections
 - ✓ Provide services or operate for at least the period ESG funds are provided, including seasonal shelters.
 - ✓ Maintain records on participants, finances, policies, and procedures

Client Rights under ESG Emergency Shelter

- Participants have federally derived rights to safe, nondiscriminatory, fair, and confidential service delivery
 - Right to Fair & Equal Access - Participants have the right to access shelter without discrimination (race, color, religion, national origin, sex, gender identity, disability).
 - Right to Safety & Habitability - Shelter residents have the right to stay in facilities meeting safety, sanitation, and building standards.
 - Right to Privacy & Data Protection - Participants have the right to confidentiality of personal information in HMIS or comparable databases.
 - Right to a Fair Termination Process - If a shelter terminates services, clients have the right to, a written notice, an opportunity to appeal and review by an impartial staff member.

Affirmative Outreach

- Grantees must make known that use of the facilities, assistance, and services are available to all on a non-discriminatory basis regardless of race, color, religion, sex, age, national origin, familial status, or disability.
- How to comply:
 1. Grantees must establish procedures that ensure that all persons are made aware of the facilities, assistance, and services available to them.
 2. Grantee should post HUD's Equal Housing Opportunity poster in a visible location, such as a public area within a shelter, and/or on the grantee's website.

Equal Access to Housing Final Rule

- The Equal Access Rule is a HUD regulation first issued in 2012 and strengthened in 2016.
- It requires all HUD-funded housing and shelter programs to provide access and services regardless of sexual orientation, gender identity, marital status and/or family composition.
- The rule was created to ensure HUD projects serve participants fairly and non-discriminatorily, and to define “family” broadly to include any group of persons presenting together for assistance.
- ESG Emergency Shelters must serve all family types. Examples:
 - Single fathers with children, LGBTQ+ families, multigenerational families, families with teenage boys, etc.
- HUD’s 2016 update requires ESG shelters to admit individuals in accordance with their self-expressed gender identity.
- Single-sex ESG shelters can exist, but only when justified by the physical configuration of the facility (e.g., shared multi-occupancy sleeping or bathing areas).

Prohibition of Family Separation in Emergency Shelters

- Overlaps with Equal Access Rule but strictly deals with access to families based on the ages of children in the family.
- Federal ESG regulations explicitly prohibit emergency shelters from separating families based on the age of a child.
- The rule states that a child under 18 cannot be used as a reason to deny a family admission to an ESG-funded shelter, nor can the presence or age of a child be used to force a family to split up to receive services.
- The rule exists to eliminate barriers for families seeking services and preserve the family unity with trauma-informed and client-centered practices.

How to Comply with Equal Access & Prohibition of Family Separation

1. If the shelter serves families, it must serve all families equally. Offer beds/units that accommodate the entire family to keep families intact.
2. Never deny access because of a minor's age or a family's composition—
 - Examples of violations would include:
 - “We don’t take boys over age 12.”
 - “A teenage child must stay in the men’s dorm while the parent stays in the women’s dorm.”
 - “We only serve married heterosexual couples.”
3. Apply this rule to admission and ongoing shelter stay - a family cannot be admitted together and then later separated because of policy.
4. Admit clients based on their self-identified gender & not ask for proof of gender identity.
5. Never discriminate based on sexual orientation or marital status.
6. Maintain written policies and provide staff training to comply with these rules with each program participant.
7. Ensure privacy and safety in a nondiscriminatory way.

Section 504 of the Rehabilitation Act of 1973

- Section 504 of the Rehabilitation Act of 1973 is a federal civil rights law that prohibits discrimination against individuals with disabilities in any program or activity that receives federal financial assistance, including ESG-funded emergency shelters.
- If your shelter receives ESG funds, you must provide equal access and reasonable accommodations to people with disabilities.
- HUD enforces Section 504 through its regulations at 24 CFR Part 8, which require federally funded shelters and housing programs to ensure physical accessibility, nondiscriminatory policies, and equal program access.
- How to comply:
 1. Ensure physical accessibility of the shelter facility
 2. Provide equal access to programs and services –
 - If parts of the building are not accessible, shelters must ensure the program services will be offered in an accessible location to equally accommodate the participant
 - Staff must assist individuals who require support
 3. Offer Reasonable Accommodations using guidance from the ESG Program Guide under the section, “Equal Access for Persons with a Disability”
 4. Maintain and follow non-discriminatory policies and procedures

Serving People with Limited English Proficiency

- People with Limited English Proficiency (LEP) are individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English.
- They are protected under Title VI of the Civil Rights Act of 1964, which prohibits national origin discrimination.
- HUD guidance makes clear that recipients of federal funds must take reasonable steps to ensure LEP individuals have meaningful access to programs, services, and vital information.
- How to comply:
 1. Individual grantees must determine the most appropriate source and method of ensuring meaningful access to the populations that they may serve.
 2. Provide language assistance services when needed
 - Examples: Over the phone interpretation, Machine language or formal translation of email communication
 3. Provide translated written vital documents such as rules and expectations, termination and grievance policies, & consent forms
 4. Include steps of compliance for staff in written policies and procedures

Faith-Based Organizations (FBO)

- Faith-based organizations are integral to serving needs in the community.
- The mission of an FBO's can be furthered with federal funds, but it's important that there's a separation of activities between the religious programming and the program under the federal award.
- If a FBO is directly funded under the ESG Program, they may not:
 - Require prayer or worship as a condition of shelter access or receiving ESG services.
 - Use federal funds to support any inherently religious activities.
 - Deny services based on a participant's personal beliefs or religion.
- If an organization offers religious activities, the activities must be offered separately, in time or location, from the programs or services funded under ESG, and participation must be voluntary.

Coordinated Entry Participation, Standardized Assessment Tool & HMIS

- All ESG funded Emergency Shelters must participate in the following, with jurisdiction from the CoC which the shelter is located:
 1. Utilize the CoC's coordinated entry system to make and receive referrals to services as applicable,
 2. Use the CoC's Standardized Assessment Tool for each client, and
 3. Enter each client's data into the CoC's designated HMIS (or comparable database as applicable)
- Households are referred through Coordinated Entry to the most appropriate housing or services under the CoC based on need.

Coordinated Entry Participation, Standardized Assessment Tool & HMIS

- Follow your CoC's intake, prioritization, and referral rules
- How to comply:
 1. Use the Standardized Assessment Tool developed by the CoC to assess every client's needs
 2. Connect clients through the community's Coordinated Entry System
 3. Take referrals from Coordinated Entry, as applicable
 4. Enter and share data through HMIS
 5. Work collaboratively with the CoC on planning and evaluation

Minimum Habitability Standards for Emergency Shelter

Minimum Standards for Emergency Shelters		
Instructions: Place a check mark in the correct column to indicate whether the property is approved or deficient with respect to each standard. A copy of this checklist should be placed in the shelter's files.		
Approved	Deficient	Standard (24 CFR part 576.403(b))
		1. <i>Structure and materials:</i> a. The shelter building is structurally sound to protect the residents from the elements and not pose any threat to the health and safety of the residents. b. Any renovation (including major rehabilitation and conversion) carried out with ESG assistance uses Energy Star and WaterSense products and appliances.
		2. <i>Access.</i> Where applicable, the shelter is accessible in accordance with: a. Section 504 of the Rehabilitation Act (29 U.S.C. 794) and implementing regulations at 24 CFR part 8; b. The Fair Housing Act (42 U.S.C. 3601 et seq.) and implementing regulations at 24 CFR part 100; and c. Title II of the Americans with Disabilities Act (42 U.S.C. 12131 et seq.) and 28 CFR part 35.
		3. <i>Space and security:</i> Except where the shelter is intended for day use only, the shelter provides each program participant in the shelter with an acceptable place to sleep and adequate space and security for themselves and their belongings.
		4. <i>Interior air quality:</i> Each room or space within the shelter has a natural or mechanical means of ventilation. The interior air is free of pollutants at a level that might threaten or harm the health of residents.
		5. <i>Water Supply:</i> The shelter's water supply is free of contamination.
		6. <i>Sanitary Facilities:</i> Each program participant in the shelter has access to sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.
		7. <i>Thermal environment:</i> The shelter has any necessary heating/cooling facilities in proper operating condition.
		8. <i>Illumination and electricity:</i> a. The shelter has adequate natural or artificial illumination to permit normal indoor activities and support health and safety. b. There are sufficient electrical sources to permit the safe use of electrical appliances in the shelter.
		9. <i>Food preparation:</i> Food preparation areas, if any, contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.
		10. <i>Sanitary conditions:</i> The shelter is maintained in a sanitary condition.
		11. <i>Fire safety:</i> a. There is at least one working smoke detector in each occupied unit of the shelter. Where possible, smoke detectors are located near sleeping areas. b. All public areas of the shelter have at least one working smoke detector. c. The fire alarm system is designed for hearing-impaired residents. d. There is a second means of exiting the building in the event of fire or other emergency.
		12. If ESG funds were used for renovation or conversion, the shelter meets state or local government safety and sanitation standards, as applicable.
		13. Meets additional recipient/subrecipient standards (if any).

CERTIFICATION STATEMENT

I certify that I have evaluated the property located at the address below to the best of my ability and find the following:

- ☐ Property meets all of the above standards.
☐ Property does not meet all of the above standards.

COMMENTS:

ESG Recipient Name: _____

ESG Subrecipient Name (if applicable): _____

Emergency Shelter Name: _____

Street Address: _____

City: _____ State: _____ Zip: _____

Evaluator Signature: _____ Date of review: _____

Evaluator Name: _____

Approving Official Signature (if applicable): _____ Date: _____

Approving Official Name (if applicable): _____

Minimum Habitability Standards for Emergency Shelter

- All Emergency Shelter locations funded with ESG must meet all minimum standards
- This includes churches if they are being used as an overnight site but not hotel/motels
- All grantees should keep a completed checklist with all criteria marked “Approved” and the second page filled out in their recordkeeping for each grant year
- This will be something you will need to produce during a monitoring

Lead-Based Paint in Emergency Shelters

- Emergency shelters must comply with:
 - Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821–4846),
 - Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851–4856),
 - Implementing regulations in Lead Safe Housing Rule (LSHR) 24 CFR part 35, subparts A, B, H, J, K, M, and R. (Emergency Shelters must specifically follow subpart K). Most emergency shelters are exempt, because they fall under the definition of zero-bedroom dwellings, which are exempt under the Title X statute.
- If you provide funds for a shelter with units having one or more bedrooms, and that receive assistance for more than 100 days, it is required that you adopt and implement a policy that assures that the child-occupied spaces will be lead safe.
- If you provide funds for a shelter with zero-bedroom units, or a shelter receiving assistance for up to, but not more than, 100 days, the units are exempt from the regulation, but HUD recommends that you adopt and implement a policy that assures that the child-occupied spaces will be lead safe, when the units are occupied by children of less than 6 years of age.

How to Comply with Lead-Based Paint Regulations in Emergency Shelters

1. Complete all parts of this form, “Lead Safe Housing Requirements (LSHR) Screening on Exemption or Limited Exemption”. [Found here - LSHR Toolkit: Screening for Exemption or Limited Exemptions](#). This form will determine if your shelter has an exemption or not to the Lead Safe Housing Rule.
2. If a shelter is exempt, collect supporting documentation of the exemption outlined in the next slides. Keep the documentation with your completed “LSHR Screening on Exemption” form for the program year.
 - Records of compliance with LBP requirements must be kept for 5 years from the program year end date.
 - If a shelter is exempt, compliance is complete after you follow this step.
3. If a shelter is found not exempt, additional guidance must be followed. See additional steps in the following slides.

Supporting Documentation of Exemptions for Lead-Based Paint in Emergency Shelters

Property Exemptions [24 CFR 35.115]	Supporting Documentation
Residential structures built after January 1, 1978.	Program documents demonstrating that structure was built after January 1, 1978, such as tax records or an appraisal.
Areas where state and local governments banned lead-based paint prior to January 1, 1978	Official documents from the jurisdiction specifying the ban, including citation of relevant legislation AND official HUD waiver of Subparts B, C, D, F – M, and R.
Emergency action activities. Emergency repairs to the property are being performed to safeguard against imminent danger to human life, health, or safety, or to protect the property from further structural damage due to natural disaster, fire, or structural collapse. This exemption applies only to repairs necessary to respond to the emergency.	Program documents, such as an inspection report that documents the condition of the property and the nature of the emergency that caused the damage.
Properties found not to have lead-based paint by a LBP Inspection per the most current HUD Guidelines.	Full Lead-Based Paint Inspection Report
Zero-bedroom dwelling units like dormitories, single-room occupancy properties, and efficiencies.	Program or property documents, including photos, that classify units as studio or SRO.

Supporting Documentation of Exemptions for Lead-Based Paint in Emergency Shelters

Property Exemptions [24 CFR 35.115]	Supporting Documentation
Elderly and disabled housing. This housing is reserved exclusively for the elderly or persons with disabilities. However, this exemption explicitly does not apply if a child of less than 6 years of age resides or is expected to reside in the unit.	Program documents that classify housing as being reserved exclusively for the elderly or persons with disabilities and demonstrate no children are permitted or actually live in (any of) the unit(s)
Rehabilitation that does not disturb paint.	Program documents, such as a work writeup, showing that no paint will be disturbed, including before/after photos.
Unoccupied units that will be demolished.	Program documents that indicate the unit is unoccupied until demolition.
Property not used for human residential habitation.	Program documents that indicate the property's purpose and showing that it is not meant for human habitation

How to Comply with Lead-Based Paint Regulations in Emergency Shelters

If the “LSHR Screening on Exemption” form shows that an Emergency Shelter is not exempt, you must continue with the following steps using the tools of the [Lead Safe Housing Rule Toolkit “Subpart K: Leasing, Support Service and Operations”](#) to implement and record compliance with Lead-Based Paint Requirements.

1. The Emergency Shelter must provide the Protect Your Family from Lead in Your Home Pamphlet, a disclosure form and disclose all known information about LBP, LBP hazards, and mitigation steps to all participants.
2. Complete Visual Assessments of the Emergency Shelter site and complete on-going assessments each year funds are awarded.
 - Employee conducting the Visual Assessment must complete the [Visual Assessment Training](#) and proof of certification must be kept in records for the program year.

How to Comply with Lead-Based Paint Regulations in Emergency Shelters

3. Any repair work or maintenance that disturbs paint above the HUD LSHR de minimis level, the work must meet certain HUD and Environmental Protection Act (EPA) requirements, including paint testing or the presumption of lead.

- If lead is present or presumed, then lead safe work practices and worker/occupant protection procedures must be implemented and documented. View the [Hazard Reduction Module](#) for more information on these procedures.
- If small repair meets the HUD standard for de minimis, complete Part 2 of the “LSHR Screening on Exemption or Limited Exemption”. A unit can only be fully exempt if no paint will be disturbed.
- Follow additional EPA Requirements, as necessary.

4. Maintain records of all Lead-Based Paint requirements in recordkeeping for 5 years after the end of the program end date.

Eligible Participants using HUD's Definitions of Homelessness

- All categories of homelessness are eligible to be served under ESG Emergency Shelter
- Category 1 – Literally Homeless
- Category 2 – Imminent Risk of Homelessness
- Category 3 – Homeless under other Federal Statutes
- Category 4 – Fleeing or attempting to flee DV

Category 1 – Literally Homeless

Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- i. Has a primary nighttime residence that is a public or private place not meant for human habitation;
- ii. Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, and local government programs); or
- iii. Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution

Category 2 – Imminent Risk of Homelessness

Individual or family who will imminently lose their primary nighttime residence, provided that:

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

- This category differs from the *At-Risk of Homelessness* definition due to having no income requirement & less supporting documentation needed to enter the emergency shelter.

Category 3 – Homeless Under Other Federal Statutes

Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

- i. Are defined as homeless under the other listed federal statutes;
- ii. Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;
- iii. Have experienced persistent instability as measured by two moves or more during the preceding 60 days; and
- iv. Can be expected to continue in such status for an extended period of time due to special needs or barriers

For the purposes of this definition, other federal statutes for defining homelessness include:

- Section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a)
- Section 637 of the Head Start Act (42 U.S.C. 9832)
- Section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e–2)
- Section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h))
- Section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012)
- Section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) OR
- Section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a)

Category 4 – Fleeing or Attempting to Flee Domestic Violence

Any individual or family who:

- i. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence
- ii. Has no other residence; and
- iii. Lacks the resources or support networks, *e.g.*, family, friends, faith-based or other social networks, to obtain other permanent housing

Eligible Activities under ESG Emergency Shelter

1. Essential Services

- Case Management
- Licensed Child Care
- Education Services
- Employment assistance & job training
- Outpatient Health Services
- Legal Services
- Life Skills training
- Outpatient Mental Health Services
- Outpatient Substance Abuse Treatment Services
- Transportation
- Services for Special Populations

2. Shelter Operations

- Rent for shelter space in approved in your Environmental Review
- Security
- Fuel for Emergency shelter designated vehicles
- Insurance
- Utilities
- Food
- Furnishings
- Essential supplies
- Hotel/Motel vouchers

Eligible Activities under ESG Emergency Shelter

- We will not go over each individual eligible ESG activity or limitation of costs during this training.
- If you plan to reimburse for an activity, review THDA's ESG Program Guide to see detailed guidance of the possible limitations of what can be purchased under those activities.
- If you still have questions about eligibility, reach out to ESG@thda.org.
- The following slides outline costs that we have frequent questions about but is not an exhaustive list.

Employee Compensation

- Employee compensation (including fringe benefits such as holiday, vacation, sick leave) must be only reimbursed for actual hours worked under that specific ESG component and must be tracked.
- Staff who work under other grants or staff who work under other ESG components (emergency shelter, RRH, HP or HMIS) cannot have their salary fully charged under ESG Emergency Shelter.
- THDA requests timesheets of all employees the first draw that their salary is reimbursed to ensure time is being tracked properly between grants and ESG components.
- Other time-keeping approaches may be accepted.
- Please contact THDA if you are not tracking specific time worked under the ESG program to ensure your time-keeping method is adequate.

Shelter Operations

- Eligible costs are the costs of maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter.
- Where no appropriate emergency shelter is available for a homeless family or individual, eligible costs may also include a hotel or motel voucher for that family or individual.
- The approval to reimburse for shelter rent must be pre-approved by THDA in the Environmental Review process.
- If agency receives multiple shelter grants, shelter operations must be split between those grants when submitting THDA reimbursement.

Gift Cards

- Gift cards are only an ESG eligible cost if a receipt is submitted to THDA showing that the gift card itself purchased ESG eligible costs.
- Because reimbursement of gift cards depends on the participant returning the receipt, we do not recommend purchasing gift cards with ESG committed funds.
- Rather, you can purchase with other funds and reimburse ESG if you get a receipt back.
 1. Grantees would need to purchase the gift cards with non-ESG committed funds to distribute to participant
 2. Participants can use the gift card and provide an itemized receipt back to Grantee showing what it was used for
 3. If the receipt shows they bought eligible ESG costs, then, Grantee can submit the receipt to THDA to reimburse the costs

Travel Logs

- Any vehicle in which the maintenance and fuel costs are reimbursed under ESG, must keep documentation of travel logs supporting the following:
 1. Date & time of the travel
 2. Description of starting point and final destination,
 3. Purpose (should not be vague descriptions, but should specify the client or project whenever possible)
 4. Mileage / odometer readings at start and end.
- This is not just specific to Emergency Shelter but also pertains to all ESG components where transportation is an eligible cost
- Make sure there is a procedure in place to support travel logs ASAP

Ineligible Expenses

- Rehabilitation or conversion of emergency shelters
- Shelter rent that was not approved by THDA in the Environmental Review process
- Legal services for immigration and citizenship matters and issues relating to mortgages
- Legal retainer fee arrangements and contingency fee arrangements
- Inpatient detoxification and other inpatient drug or alcohol treatment
- Child-care in an unlicensed facility
- More than 30 days of outpatient substance abuse treatment services
- Any maintenance or fuel costs supporting the client's personal vehicle
- Any cost that should be split between ESG and another grant but was charged to ESG at 100%
- This is not an exhaustive list of ineligible costs. See THDA's ESG Program Guide.

Emergency Shelter Client File Checklist

ESG Client File Checklist / EMERGENCY SHELTER



Client Name _____ HMIS / Comparable Database # _____
Entry Date _____ Exit Date _____

1. _____ Documentation of program **enrollment in HMIS** (or comparable database) 24 CFR 576.400(f)
Provide a screenshot of the client's enrollment in the program, with entry and exit dates.
2. _____ Evidence of **Centralized or Coordinated Intake Form/Initial Assessment** printed and included in file identifying client's most pressing needs. *Must be dated within 1 week of entry date. 24 CFR 576.401(a) & 24 CFR 576.500(g)*
All must be explained/provided to client and client signed off acknowledging they were given this information.
 - ☐ ESG Emergency Shelter Rules
 - ☐ Release of Information & Personal Privacy Protection Policy
 - ☐ Rights to Fair Housing
 - ☐ Termination & Grievance Policy
 - ☐ "Protect Your Family from Lead in Your Home" pamphlet for shelters built before 1978 and housing children under 6 and/or pregnant women
3. _____ **Self-Certification** of an eligible **definition of homelessness** at program entry.
 - ☐ Literally Homeless (Paragraph 1 homeless)
 - ☐ Imminent-Risk-of-Homelessness (Category 2 homeless)
 - ☐ Homeless under other federal statutes (Category 3 homeless)
 - ☐ Fleeing or attempting to flee domestic violence (Category 4 homeless)
 - ☐ At risk of Homelessness
4. _____ Record of **services provided** while in shelter program 24 CFR 576.102(a)(1), 576.500(l)
Essential Services

☐ Shelter stay	☐ Employment assistance/job training
☐ Motel Voucher	☐ Outpatient health services
☐ Case management	☐ Legal services
☐ Transportation	☐ Life skills training
☐ Childcare	☐ Mental health services
☐ Education services	☐ Substance abuse treatment services
5. _____ Documentation of **referral and connection** to homeless and mainstream services. 24 CFR 576.401(d)
Must show that the referral/connection(s) occurred while the client was in the program.
6. _____ Documentation of provision of **Termination Procedure** 24 CFR 576.500(f)(3) & 24 CFR 576.402
Include reasons for termination as well as the procedure for if/when a client is terminated from the shelter program
Was the client terminated from the program? ☐ Yes ☐ No
If yes, provide documentation related to the termination proceeding.

Were any **Essential Services** provided to the client? *This includes Essential Services listed above that were provided specific to this participant and would not include items or services purchased for the shelter as a part of services costs.*
☐ Yes, with ESG ☐ Yes, without ESG ☐ No Essential Services were provided

If ESG was used to provide Essential Services, the following requirements apply:

1. _____ **Payment documentation of any and all Essential Services provided with supporting documentation.**
 - Payment documentation includes invoices and proof of payments for all services and/or hotel costs provided to the participant. Minimum required would be a receipt.
 - Supporting documentation may include documentation that lawyers used are licensed and in good standing with the bar association, invoice from credit repair class, budgeting class, or mediation services.
 - ESG Financial Tracking Form can be used to organize expenses. This optional form is found on THDA's website.
2. _____ **If hotel/motel stay was provided**, include documentation that no other appropriate emergency shelter was available for the participant. Case manager due diligence is documented with a case note in finding other appropriate shelter.

Notes

1. Enrollment into HMIS

- All shelter clients are required to be entered into HMIS.
- Include in the client file a screenshot on the HMIS or comparable database screen showing date of enrollment into your program.
- Additional checks for shelter staff:
 - Check HMIS or comparable database to determine if the client is currently receiving assistance from any other federal funding sources. Clients cannot receive funding for duplicate services at the same time.
 - Data should be updated in HMIS as changes in the client's circumstances occur.
 - Clear picture of the client's time in the program should be recorded in HMIS.

2. Centralized Intake Form or Initial Assessment and Required Enrollment Forms

- Agency must keep documentation evidencing the use of the centralized or coordinated assessment system(s) developed by the Continuum of Care(s).
- The best way to show this would be including a completed copy of the CoC developed coordinated assessment for that client in their ESG client file.
- As part of the initial assessment, enrollment forms must be explained and/or provided to client. To show this was done, the case manager can complete a case note that all were provided, or the client can sign off that they received the following:
 - ESG Emergency Shelter Rules
 - Release of Information for HMIS all relevant contacts & Personal Privacy Protection Policy
 - Rights to Fair Housing
 - Termination & Grievance Policy
 - “Protect Your Family from Lead in Your Home” pamphlet for shelters without an LBP exception

3. Certifying Homelessness Status

- ESG Emergency Shelter costs may only be provided to eligible participants of ESG meeting one of HUD's Homeless Definitions.
- Documentation of the client's homelessness status must be kept in the client's file.
- Self-certification of homelessness from the head of household is the primary method of establishing homelessness status for Emergency Shelters. Examples:
 - Self-certification from client that they are homeless
 - HMIS or HMIS Comparable Database screen shot that shows a client already enrolled in a program for persons experiencing homelessness
 - Case note from a case manager explaining the homelessness status of the client
- Lack of third-party documentation must not prevent an individual or family from being immediately admitted to emergency shelter or receiving services provided by a victim service provider.

4. Record of Services Provided

- It is a requirement that the grantee must keep records of the types of essential services provided under the ESG and the amounts spent on these services and assistance.
- All eligible Emergency Shelter Essential Services provided on an individual basis should be tracked in the client's file. This includes:
 - Case management, child-care, education services, employment assistance & job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, transportation, services for special populations.
 - This also would include hotel/motel vouchers under Emergency Shelter operations since that is provided on an individual basis.
- Case notes are a recommended option to satisfy this requirement.
- Any financial assistance supporting documentation should also be collected and inserted in the client's chart as a part of #7 of the Emergency Shelter Client File Checklist.

5. Referral and Connection

- THDA grantees are expected to provide case management to all ESG program participants, including connecting program participants to mainstream and other resources. Grantees should assist each program participant, as needed, to obtain:
 - Appropriate supportive services, including assistance in obtaining permanent housing, medical health treatment, mental health treatment, counseling, supervision, and other services essential for achieving independent living; AND
 - Other Federal, State, local, and private assistance available to assist the program participant in obtaining housing stability, including:
 - Medicaid
 - Supplemental Nutrition Assistance Program
 - Women, Infants and Children
 - Federal-State Unemployment Insurance Program
 - Social Security Disability Insurance (SSDI)
 - Supplemental Security Income (SSI)
 - Child and Adult Care Food Program
 - Other assistance available under the programs listed in § 576.400(c)
- Referrals & Connections can be tracked using the Referral Tracking Tool found on our website or through case notes.

6. Termination Procedure

- Terminated clients are clients who left the program involuntarily by violating program requirements.
- Evidence that proper termination procedure was followed must be in the client files of all terminated clients.
- For THDA's ESG Emergency Shelter program, the ESG Contract outlines the following must be included in the termination policy at a minimum:
 1. Providing the program participant with a written copy of the program rules and the termination process before the participant beneficiary begins to receive assistance;
 2. Written notice to the program participant containing a clear statement of the reasons for termination; and
 3. A review of the decision by a staff person of the Grantee who was not involved in the decision to terminate (or a subordinate of that person)
- Policies must outline the situations that warrant termination and how many warnings the client may receive. It's important to only terminate clients in severe circumstances and shouldn't bar the participant from receiving services at a later date.
- Assistance may not be terminated to any recipients based upon these barriers. Examples of this include:
 - Failure to participate in supportive services and case management activities;
 - Failure to make progress on a services plan;
 - Loss of income or failure to improve income;
 - Being a victim of domestic violence.

6. Termination Procedure

- How to document proper termination procedure in the client file:
 - Case notes of instances where the client violates program rules leading up to the termination or copies of formal violations AND
 - Final case note details how all aspects of the termination policy were met or copy of written notice of termination that was given to participant is included. AND
 - Screenshot of the client's exit from your shelter program in HMIS

Clients who have exited the Emergency Shelter Program

- Clients who have exited the program include, those who have successfully completed the program and are moving into other housing or clients who have voluntarily left the program, this includes no contact clients.
- For a full picture of the client's stay in the shelter program, details of the client's exit should also be included in the client's file.
- How to document an exit from the shelter program in a client's file:
 - Case notes from the case manager explaining the details of the client's program exit or final housing stability plan showing their housing plan after exit. For no contact clients, include a final note that they did not return to the shelter for services. AND
 - HMIS or comparable database screenshot of the HMIS exit

7. Financial Assistance Tracking

- As a part of #4 of the Emergency Shelter Client File Checklist, all essential services provided to the client on an individual basis should be tracked in the client's file.
- This part includes recording the dollar amounts of the essential services provided. The following payment documentation should be included in the client file:
 1. Copy of the invoice
 2. Copy of check, receipt or other source documentation that evidences the date of payment, the payee, and the amount
 3. Copy of itemized receipt can be used in lieu of the above bullets. Optional Financial Assistance Tracking Form can be found on our website.

Simplified Shelter Case Management Requirements

1. Complete CoC's Coordinated Assessment form with participant
2. Give client all relevant program rules and information
3. Enroll clients into HMIS and update their data often
4. Document participant's homelessness status
5. Record all services the client received
6. Make and document referrals to relevant supportive services in the area and/or mainstream benefits
7. If applicable, ensure that termination procedure was accurately followed and documented
8. Update HMIS to show participant's next step after time in the program ends

Questions?

To reach our entire team –

ESG@thda.org

Jodi Smith – ESG Housing Program Manager

(615) 815-2038

jsmith@thda.org

Cheri Ballinger – ESG Housing Program Coordinator

(615) 815-2041

cballinger@thda.org

Brianna Atol – ESG Senior Housing Program Coordinator

(615) 815-2216

batol@thda.org

Additional Resources

THDA's ESG Program Guide – Updated October 2025

- <https://dogvxws799i6n.cloudfront.net/wp-content/uploads/Emergency-Solutions-Grants-2025-Program-Guide.pdf>

Emergency Shelter Client File Checklist

- https://dogvxws799i6n.cloudfront.net/wp-content/uploads/ESG-Client-File-Checklist-Emergency-Shelter_2024-07-25-183610_kvjy.pdf

Habitability Standards for Emergency Shelter

- <https://dogvxws799i6n.cloudfront.net/wp-content/uploads/4-ESG-Emergency-Shelter-and-Permanent-Housing-Standards-1.pdf>

ESG Administrator's Forms Page

- <https://thda.org/govt-non-profit/esg-program-forms/>

Lead Safe Housing Rule (LSHR) Toolkit: Subpart K

- <https://www.hudexchange.info/programs/lead-based-paint/lshr-toolkit/subpart-k-lsso/>

ESG Program HUD Exchange

- <https://www.hudexchange.info/programs/esg/>