

THDA's ESG Homelessness Prevention Training

MAY 2026

Homelessness Prevention

- The purpose of Homelessness Prevention is to provide housing relocation and stabilization services and short- and/or medium-term rental assistance necessary to prevent an individual or family from experiencing homelessness.
- The primary focus should be on Case Management to ensure long-term stability for participants, not just paying rent.

Homelessness Prevention Design

- Ideally, enrollments in HP should typically last between 2-6 months (but must not exceed 24 months) to ensure that ample case management is provided to the household to:
 - Resolve conflicts between landlords and tenants
 - Link with necessary programs like SNAP, SOAR, Families First, etc.
 - Increase household income through employment, SSI, SSDI, etc.
- Costs under HP are eligible only to the extent that the assistance is necessary to help the program participant regain stability in their current permanent housing or move into other permanent housing and achieve stability in that housing.

2025 Compliance Schedule

- All 2025 Grantees will be monitored by THDA's Compliance and Asset Management (CAM) Team
- It is the Grantee's responsibility to ensure that all Homelessness Prevention funding is used only for eligible participants, and all recordkeeping requirements are met.
- This training focuses mostly on client file recordkeeping and is not an exhaustive overview of HP requirements that will be reviewed during monitoring.
- 2025 ESG Program Guide contains all requirements of the ESG program as it pertains to HUD regulations and THDA guidance. Familiarize yourself with this guide.

Eligible Participants and Costs Overview

The following costs are eligible to participants who are:

- Homeless Category 2
- Homeless Category 3
- Homeless Category 4
- At Risk of Homelessness

Participants must also meet income requirement of an annual income below 30 percent of median family income for the area, as determined by HUD.

RENTAL ASSISTANCE	FINANCIAL ASSISTANCE	STABILIZATION SERVICES
• Short-term rental assistance • Medium-term rental assistance • Rental arrears	• Rental Application Fees • Security Deposits • Last Month's Rent • Utility Deposits • Utility Payments • Moving Costs	• Housing Search and Placement • Housing Stability Case Management • Mediation • Legal Services • Credit Repair
OVERHEAD COSTS may also be billed to ESG HP		
• Operation of Homelessness Prevention Program • Employee compensation of direct Homelessness Prevention services.		

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

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 (explained on next slide);
- 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

Category 3 – Homeless under other Federal Statutes cont.

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 DV

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

At Risk of Homelessness Paragraph 1

Paragraph 1

The individual or family must:

- 1. Have income below 30 percent of median income for the geographic area; AND
- 2. Have insufficient resources immediately available to attain housing stability to prevent them from moving to an emergency shelter or another place described in category 1 of the homeless definition; AND
- 3. Meet at least one of the following conditions:

- A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance
- B) Is living in the home of another because of economic hardship
- C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within **21 days** after the date of application.
- D) Lives in a hotel or motel not paid for by charitable organizations or federal, state, or local government
- E) Lives in severely overcrowded housing; [in SRO or efficiency apartment unit in which more than two persons, on average, reside or another type of housing in which there reside more than 1.5 persons per room, as defined by the U.S. Census Bureau.]
- F) Is exiting a publicly funded institution; or system of care, [such as a health-care facility, mental health facility, foster care or other youth facility, or correction program or institution.]
- G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness as described by the Consolidated Plan

At Risk of Homelessness cont.

Paragraph 2

A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15))

Paragraph 3

A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

PRWORA Requirements

What is PRWORA?

PERSONAL RESPONSIBILITY AND WORK OPPORTUNITY RECONCILIATION ACT OF 1996 (PRWORA)

Why does it Matter?

THDA and its Grant Recipients are responsible for complying with all applicable immigration restrictions and requirements, including the eligibility and verification requirements that apply under title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, as amended (8 U.S.C. 1601-1646) (“PRWORA”), which was signed by President Clinton on August 22, 1996, and any applicable requirements that the U.S. Department of Health and Human Services (“HHS”), the U.S. Attorney General, or the U.S. Citizenship and Immigration Services may establish from time to time to comply with PRWORA, Executive Order 14218, or other Executive Orders or immigration laws.

Procedures for Complying with PRWORA

STEP 1: Assure your applications for your program require the applicant to declare under penalty of perjury that he or she is a U.S. Citizen, Non-Citizen National of the U.S., or a Qualified Alien.

STEP 2: If an individual on the application does not fall under one of the three designations above, that individual is ineligible for the program.

STEP 3A: If an individual declares they are a U.S. Citizen or a U.S. Non-Citizen National (see Step 3B for Qualified Aliens):

1. Ask the applicant to present a document demonstrating that he or she is a U.S. Citizen or U.S. Non-Citizen National.
2. See Attachment A for authorized documentation.
3. If the documentation reasonably appears on its face to be genuine and to relate to the individual presenting it, the Grant Recipient should accept the document as conclusive evidence that the applicant is a U.S. Citizen or U.S. Non-Citizen National and should not verify status any further.

Procedures for Complying with PRWORA

4. If the documentation presented does not on its face reasonably appear to be genuine or to relate to the individual presenting it, the Grant Recipient should contact THDA.
5. If an applicant declares to be a U.S. Citizen or U.S. Non-Citizen National in the application, but cannot currently produce documentation to support its declaration, Grant Recipient must:
 - A. Request a written declaration, made under penalty of perjury, from a third party indicating a reasonable basis for personal knowledge that the applicant is a U.S. citizen or non-citizen national; and
 - B. Applicant must provide proof that they applied for proper documentation, and they will be given an extension up to thirty (30) days. During such time the application may proceed. Further extension will require THDA approval.
 - C. If an applicant has lost his or her original documents or never had an original document demonstrating naturalized or derivative citizenship, refer the applicant to the local INS office to obtain documentation of status.
 - D. If documentation is not provided before the expiration of any extension, the assistance must be denied to that individual, with an opportunity to appeal.

Procedures for Complying with PRWORA

STEP 3B: If an individual declares they are a Qualified Alien:

1. Ask the applicant to provide documentation evidencing his or her status as a Qualified Alien.
2. See Attachment A for authorized documentation.
3. If the documentation reasonably appears on its face to be genuine and to relate to the individual presenting it, you should accept the documentation and either verify the status in SAVE if your organization is able to access SAVE or forward to THDA to verify status in SAVE.
4. If the documentation does not reasonably appear on its face to be genuine or to relate to the individual presenting it, forward to THDA.
5. If the applicant has submitted a written declaration, under penalty of perjury, that he or she is a Qualified Alien, you should not delay, deny, reduce or terminate the applicant's eligibility for benefits under the program on the basis of an applicant's immigration status during the period of time it takes to verify his or her immigration status in SAVE.

Attachment A – LIST OF DOCUMENTS FOR U.S. CITIZENS AND NATIONALS

To show you are a U.S. citizen or U.S. national, provide a copy of ONE of these documents:

- U.S. Passport
- Certificate of Naturalization (N-550/N-570)
- Certificate of Citizenship (N-560/N-561)
- Document from federally recognized Indian tribe that includes your name and the name of the federally recognized Indian tribe that issued the document, and shows your membership, enrollment, or affiliation with the tribe.

Documents you can provide include:

- A Tribal enrollment card,
- A Certificate of Degree of Indian Blood,
- A Tribal census document,
- Documents on Tribal letterhead signed by a Tribal official

If you don't have any documents from the previous list, provide a copy of TWO documents – ONE from each list below.

- U.S. public birth certificate
- Consular Report of Birth Abroad (FS240, CRBA)
- Certification of Report of Birth (DS-1350)
- Certification of Birth Abroad (FS-545)
- U.S. Citizen Identification Card (I-197 or the prior version I-179)
- Northern Mariana Card (I-873)
- U.S. Civil Service Employment Record showing employment before June 1, 1976
- Military record showing a U.S. place of birth
- U.S. medical record from a clinic, hospital, physician, midwife or institution showing a U.S. place of birth
- U.S. life, health or other insurance record showing U.S. place of birth
- Religious record showing U.S. place of birth recorded in the U.S.
- School record showing the child's name and U.S. place of birth
- Federal or State census record showing U.S. citizenship or U.S. place of birth
- Final adoption decree showing the person's name and U.S. place of birth
- Documentation of a foreign-born adopted child who received automatic U.S. citizenship (IR3 or IH3)
- Driver's license issued by a U.S. State or Territory
- Identification card issued by the Federal, state, or local government
- School identification card
- A clinic, doctor, hospital, or school record, including preschool or day care records (for children under 19 years old)
- U.S. military card or draft record or Military dependent's identification card
- U.S. Coast Guard Merchant Mariner card
- Voter Registration Card
- Two other documents that prove your identity, like employer identification cards, high school and college diplomas, marriage certificates, divorce decrees, property deeds, or titles

Attachment A Contd. –

LIST OF DOCUMENTS FOR ELIGIBLE IMMIGRATION STATUS FOR QUALIFIED ALIENS

To show you are a Qualified Alien, provide a copy of ONE of these documents:

- Permanent Resident Card, “Green Card” (I-551)
- Employment Authorization Card “Work Permit” (I-766)
- Foreign passport with acceptable visa • Arrival/Departure Record in foreign passport (I-94) Reentry Permit (I-327) • Arrival/Departure Record (I-94/I-94A)
- Temporary I-551 Stamp (on Passport or I-94/I-94A)
- Administrative order staying removal issued by the Department of Homeland Security
- Document indicating withholding of removal (or withholding of deportation) • Refugee Travel Document (I-571)
- Machine Readable Immigrant Visa (with temporary I-551 language)
- Certificate of Eligibility for Nonimmigrant Student Status (I-20)
- Certificate of Eligibility for Exchange Visitor Status (DS-2019)
- Notice of Action (I-797)
- Certification from U.S. Department of Health and Human Services (HHS) Office of Refugee Resettlement (ORR)
- Office of Refugee Resettlement (ORR) eligibility letter (if under 18)
- Document indicating a member of a federally-recognized Indian tribe or American Indian born in Canada • Resident of American Samoa Card

PRWORA Reminders

- PRWORA requires beneficiaries receiving assistance resulting from federal funds to be US citizens, US non-citizen nationals, or qualified aliens.
- Grant Recipients shall verify immigration status to prevent any Federal public benefit from being provided to an ineligible alien who entered the United States illegally or is otherwise unlawfully present in the United States.
- Grant Recipients shall not use federal funding provided by THDA in a manner that by design or effect facilitates the subsidization or promotion of illegal immigration or shields illegal aliens from deportation, including by maintaining policies or practices that materially impede enforcement of federal immigration statutes and regulations.
- Grant Recipients shall assure PRWORA verification steps are applied the same to every applicant regardless of an applicant's race, color, religion, sex, age, national origin, or familial status.

Eligible Costs under Rental Assistance



Short-term Rental Assistance –
1-3 months of rent



Medium-term Rental Assistance –
4-24 months of rent



Rental Arrears – Arrears may not accrue while client is enrolled, only prior to enrollment. Eligible for a one-time payment of up to 6 months of arrears with late fees. Each month of arrears counts towards maximum of 24 months of rental assistance in a 3-year period.

Eligible Costs under Financial Assistance



Rental Application Fees - ESG funds may pay for the rental housing application fee that is charged by the owner to all applicants.



Security Deposits - ESG funds may pay for a security deposit that is equal to no more than 2 months' rent. Pet deposits are not eligible.



Last Month's Rent -If necessary to obtain housing for a program participant, the last month's rent may be paid to the owner of that housing *at the time the owner is paid the security deposit and the first month's rent*. This assistance must not exceed one month's rent and must be included in participant's total rental assistance, which cannot exceed 24 months during any 3-year period.



Utility Deposits - ESG funds may pay for a standard utility deposit required by the utility company for all customers for gas, electric, water and sewage.



Utility Payments - ESG funds may pay for up to 24 months of utility payments, per service, including up to 6 months of utility payments in arrears, per service. A partial payment of a utility bill counts as one month. Provided only if 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. Eligible utility services are gas, electric, water, and sewage.



Moving Costs - ESG funds may pay for moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to 3 months. Fees must be accrued after program enrollment date and before the program participant moves into permanent housing. Storage fees in arrears is not eligible.

Eligible Costs under Stabilization Services



Housing Search and Placement - Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing



Housing Stability Case Management - Cost of assessing, arranging, coordinating, & monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing



Mediation – Any costs of mediation between the client and owner of where the client is living. Mediation must be necessary to prevent client from losing their housing where they currently reside.



Legal Services – Hourly fees of licensed attorneys to address landlord/tenant matters. The services must be necessary to resolve a legal problem that will likely result in the program participant losing the permanent housing in which the program participant currently resides.



Credit Repair - Credit counseling and other services necessary to give clients critical skills related to household budgeting, managing money, accessing a free personal credit report, & resolving personal credit problems. This assistance does not include the payment or modification of a debt.

Eligible Overhead Costs



Operations - Rent and/or utilities for office or building used to conduct HP services, Office supplies, Mileage of employees providing direct service



Employee Compensation – salaries of those providing direct service which includes benefits packages

Operations

- Operations charged under Homelessness Prevention must directly relate back to carrying out Homelessness Prevention activities.
- Operations need to appropriately be split between all awarded grants and/or multiple ESG activities in that fiscal year – so if your agency has more than one grant operations cannot be charged to ESG at 100%

Employee Compensation

- ESG employee compensation (including fringe benefits such as holiday, vacation, sick leave) must only be reimbursed for actual hours worked under the ESG program.
 - **All employees must complete timesheets** reflecting actual ESG hours worked per activity. Timesheets where hours are reimbursed to ESG must clearly allocate time by notating “ESG” as well as the ESG component on the timesheet for those hours worked.
- Include brief descriptions of daily activities compensated under ESG
- Detailed Timesheets must be signed by employees to certify for accuracy. Then, supervisors must review to ensure that the activities align with the job duties and program eligibility requirements. Supervisors must sign and date all timesheets.
- Any corrections on timesheets must be clearly marked, dated and initialed by supervisor.

Employee Compensation

- Budget estimates (meaning, estimates determined before the services are performed) alone do not qualify as support for charges to Federal awards.
- Employees cannot be charging 100% of their salary to ESG Homelessness Prevention if:
 - An employee works some hours under another grant or funding source.
 - An employee is working with clients who are not in the Homelessness Prevention program but in another program funded by ESG or another grant.
 - A staff member who spends their day working under multiple ESG activities.
 - Any portion of their day cannot be linked back to work that supports that ESG activity.
- Rule of thumb: Salaries may only be charged to ESG if there are timesheets proving ESG work was done with that time.

Ineligible Costs

- The cost of a hotel/motel to prevent the client from entering an emergency shelter
- Internet for clients is not an eligible utility
- Legal services for immigration and citizenship matters and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements.
- More than 24 months of case management, rental and utility assistance in any 3-year period. Agencies must enact due diligence to ensure these limits are not exceeded.
- Otherwise ESG eligible activities, however, they are not included in your agency's written standards as an eligible cost your agency provides
- Child-care
- Rental assistance where the unit does not meet FMR, Rent Reasonableness and/or Habitability Standards

Common Findings in Monitoring

Client files lacking the following documentation:

- Case management and linkage to resources
- FMR, Rent Reasonableness and LBP requirements
- Documentation of payments made from ESG funds
- Termination Process was followed and/or how client exited the program

Homelessness Prevention Client File Checklist

- Homelessness Prevention Checklist is linked here
- Optional forms provided throughout this presentation are linked here.

1. Enrollment into HMIS

ESG Client File Checklist / HOMELESSNESS PREVENTION



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. _____ Intake form/Initial Assessment identifying client's most pressing needs 24 CFR 576.401(a)
All of the following must be explained/provided to client at project entry.
☐ Grievance & Termination Policy
☐ Program rules
☐ Right to Fair Housing
☐ Releases of Information for HMIS and other entities on behalf of participant
☐ "Protect Your Family from Lead in Your Home" pamphlet
☐ "Notice of Occupancy Rights under the Violence Against Women Act" HUD Form 5380

3. _____ ESG Verification of Homeless Status Form with supporting documentation
Must follow documentation requirements outlined in 24 CFR 576.103 & 24 CFR 576.500 (b) & (c)
☐ At-Risk of Homelessness
☐ Imminent risk of homelessness (Category 2 Homeless)
☐ Homeless under other federal statutes (Category 3 Homeless)
☐ Fleeing/attempting to flee domestic violence (Category 4 Homeless)

4. _____ Documentation that participant is at or below 30% AMI at program entry 24 CFR 576.500(e) & 24 CFR 576.401(c)
☐ ESG Income & Asset Calculation Worksheet AND
☐ Source documentation

Include the following ONLY IF source documents are unavailable:
☐ ESG Third-Party Verification of Income AND
☐ ESG Self-Certification of Income Form

5. _____ Record of ESG services provided while in HP program 24 CFR 576.105, 24 CFR 576.106, 24 CFR 576.500(f)

<u>Financial Assistance</u> ☐ Rental application fees ☐ Security deposit ☐ Last month's rent ☐ Utility deposits/payments ☐ Moving costs	<u>Rental Assistance</u> ☐ Short-term Rental Assistance ☐ Medium-term Rental Assistance ☐ Rental arrears	<u>Stabilization Services</u> ☐ Housing search and placement ☐ Housing stability case management ☐ Mediation ☐ Legal services ☐ Credit repair
---	--	---

6. _____ 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. Referral Tracking Tool can be found on THDA's ESG website.

7. _____ Case notes documenting case management meetings, at least monthly 24 CFR 576.401(e)(1)(i)

ESG Client File Checklist – Homelessness Prevention

Page 1 of 6

- All participants must be entered into HMIS unless grantee is a DV provider or a legal services provider, must be using a comparable database. File must show this.
- A HMIS screenshot can be used as documentation in the applicant's file to show enrollment into HMIS or comparable database
- This should show entry and exit dates


Tennessee Housing
Development Agency

2. Centralized Intake Form or Initial Assessment

ESG Client File Checklist / HOMELESSNESS PREVENTION 

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. _____ **Intake form/Initial Assessment** identifying client's most pressing needs 24 CFR 576.401(a)
All of the following must be explained/provided to client at project entry.

- ☐ Grievance & Termination Policy
- ☐ Program rules
- ☐ Right to Fair Housing
- ☐ Releases of Information for HMIS and other entities on behalf of participant
- ☐ "Protect Your Family from Lead in Your Home" pamphlet
- ☐ "Notice of Occupancy Rights under the Violence Against Women Act" HUD Form 5380

3. _____ **ESG Verification of Homeless Status Form** with supporting documentation
Must follow documentation requirements outlined in 24 CFR 576.103 & 24 CFR 576.500 (b) & (c)

- ☐ At-Risk of Homelessness
- ☐ Imminent risk of homelessness (Category 2 Homeless)
- ☐ Homeless under other federal statutes (Category 3 Homeless)
- ☐ Fleeing/attempting to flee domestic violence (Category 4 Homeless)

4. _____ **Documentation that participant is at or below 30% AMI at program entry** 24 CFR 576.500(e) & 24 CFR 576.401(c)

- ☐ ESG Income & Asset Calculation Worksheet **AND**
- ☐ Source documentation

Include the following ONLY IF source documents are unavailable:

- ☐ ESG Third-Party Verification of Income **AND**
- ☐ ESG Self-Certification of Income Form

5. _____ **Record of ESG services provided** while in HP program 24 CFR 576.105, 24 CFR 576.106, 24 CFR 576.500(i)

<u>Financial Assistance</u>	<u>Rental Assistance</u>	<u>Stabilization Services</u>
☐ Rental application fees	☐ Short-term Rental Assistance	☐ Housing search and placement
☐ Security deposit	☐ Medium-term Rental Assistance	☐ Housing stability case management
☐ Last month's rent	☐ Rental arrears	☐ Mediation
☐ Utility deposits/payments		☐ Legal services
☐ Moving costs		☐ Credit repair

6. _____ **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. Referral Tracking Tool can be found on THDA's ESG website.

7. _____ **Case notes documenting case management meetings**, at least monthly 24 CFR 576.401(e)(1)(i)

ESG Client File Checklist – Homelessness Prevention Page 1 of 6

- Agency must keep documentation evidencing the use of the centralized or coordinated assessment system(s) developed by the Continuum of Care(s) in accordance with the requirements established by HUD
- The best way to show this would be including the CoC developed coordinated assessment done for the individual in the client's ESG file
- All must be explained or provided to client and client signed off acknowledging they were given this information.
 - Grievance & Termination Policy
 - Program rules
 - Right to Fair Housing
 - Releases of Information for HMIS and other entities on behalf of participant
 - "Protect Your Family from Lead in Your Home" pamphlet
 - "Notice of Occupancy Rights under the Violence Against Women Act" HUD Form 5380 (**must be given to client at program entry and if/when rental assistance is provided**)

Order of Obtaining Documentation

This order must be outlined in your agency's ESG Written Standards and followed to verify Category of Homelessness or At Risk of Homelessness & Annual Income:

1. Source documentation (*e.g.*, eviction notice, notice of termination from employment, unemployment compensation statement, public benefits statement, bank statement)
2. *To the extent that source documents are unobtainable*, a written statement by the relevant third party (*e.g.*, former employer, owner, primary leaseholder, public administrator, hotel or motel manager, government benefits administrator) OR the written certification by the agency's intake staff of the oral verification by the relevant third party that the applicant meets criteria.
3. *To the extent that source documents and third-party verification are unobtainable*, a written statement of due diligence by intake staff that the staff person has verified and determined the applicant meets criteria necessary. Intake staff must include the attempts taken to obtain the required evidence. Participant also must self-certify their circumstances.

3. Verification of Housing Status for HP

ESG Client File Checklist / HOMELESSNESS PREVENTION



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. _____ Intake form/Initial Assessment identifying client's most pressing needs 24 CFR 576.401(a)
All of the following must be explained/provided to client at project entry.
☐ Grievance & Termination Policy
☐ Program rules
☐ Right to Fair Housing
☐ Releases of Information for HMIS and other entities on behalf of participant
☐ "Protect Your Family from Lead in Your Home" pamphlet
☐ "Notice of Occupancy Rights under the Violence Against Women Act" HUD Form 5380

3. _____ ESG Verification of Homeless Status Form with supporting documentation
Must follow documentation requirements outlined in 24 CFR 576.103 & 24 CFR 576.500 (b) & (c)
☐ At-Risk of Homelessness
☐ Imminent risk of homelessness (Category 2 Homeless)
☐ Homeless under other federal statutes (Category 3 Homeless)
☐ Fleeing/attempting to flee domestic violence (Category 4 Homeless)

4. _____ Documentation that participant is at or below 30% AMI at program entry 24 CFR 576.500(e) & 24 CFR 576.401(c)
☐ ESG Income & Asset Calculation Worksheet AND
☐ Source documentation

Include the following ONLY IF source documents are unavailable:
☐ ESG Third-Party Verification of Income AND
☐ ESG Self-Certification of Income Form

5. _____ Record of ESG services provided while in HP program 24 CFR 576.105, 24 CFR 576.106, 24 CFR 576.500(i)

Financial Assistance	Rental Assistance	Stabilization Services
☐ Rental application fees	☐ Short-term Rental Assistance	☐ Housing search and placement
☐ Security deposit	☐ Medium-term Rental Assistance	☐ Housing stability case management
☐ Last month's rent	☐ Rental arrears	☐ Mediation
☐ Utility deposits/payments		☐ Legal services
☐ Moving costs		☐ Credit repair

6. _____ 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. Referral Tracking Tool can be found on THDA's ESG website.

7. _____ Case notes documenting case management meetings, at least monthly 24 CFR 576.401(e)(1)(i)

ESG Client File Checklist – Homelessness Prevention

Page 1 of 6

- In the client's file:
 - Include a clear declaration that the client is either Homeless Category 2, Homeless Category 3, Homeless Category 4 or At Risk of Homelessness
 - Proper supporting documentation must also be attached with the declaration
 - File must also show that client lacks resources to obtain housing without ESG assistance. This could be a case note or ESG Statement of Insufficient Resources linked below.
- Optional Forms to use to satisfy requirement:
 - ["Verification of Housing Status" Form linked here and, on our website, to help satisfy this requirement.](#)
 - ["ESG Statement of Insufficient Resources" can be used to certify the participant is lacking financial and social supports.](#)


Tennessee Housing
Development Agency

3. Verification of Housing Status Form

ESG VERIFICATION OF HOUSING STATUS

Client Name: _____ HMIS/DV#: _____ Program: _____

How to complete this form and supporting documentation:

- o Complete page 1 and 2 of this document by indicating housing status and activity.
- o Attach one of the following:
 - o Written third party documentation (preferred by HUD)
 - o Oral 3rd party (attach statement confirming oral conversation directly to this form if unable to obtain written third-party documentation)
 - o Intake Staff Observations for street outreach (attach statement confirming observations directly to this form)
 - o Completed Self-Certification form by the participant – pages 4 and 5 of this document (only if unable to obtain third party documentation)

CRITERIA FOR DEFINING HOMELESSNESS (Place an "X" In the correct ESG activity)	
Category 1 – Literally Homeless ☐ Street Outreach ☐ Emergency Shelter ☐ Rapid Rehousing	Individual or family who lacks, regular and adequate nighttime residence, meaning: • Primary nighttime residence is public or private and not meant for human habitation (<u>eligible for street outreach, shelter, RRH</u>). • Is living in a public or privately- operated shelter (congregate shelters, transitional housing and hotels and motels are paid for by charitable organizations or federal, state and local government (<u>shelter and RRH only; does not meet street outreach eligibility</u>). • 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 (<u>shelter and RRH only; does not meet street outreach eligibility</u>).
Category 2 – At Imminent Risk or at risk of Homelessness ☐ Emergency Shelter ☐ Homelessness Prevention	Individual or family who will imminently lose their primary nighttime residence, provided that: • Residence will be lost within 14 days of the date of application for homeless assistance; <u>and</u> • No subsequent residence has been identified; <u>and</u> • The individual or family lacks the resources or support networks needed to obtain other permanent housing
Category 3 – Youth or Families with Children ☐ Emergency Shelter ☐ Homelessness Prevention	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: • Are defined homeless under the listed federal statutes; • Have no lease, ownership interest or occupancy agreement in permanent housing for 60 days prior to the homeless assistance application; • Have experience persistent instability as measured by two (2) moves or more during in the preceding 60 days; <u>and</u> • Can be expected to continue such status for an extended period due to special needs and barriers.
Category 4 – Fleeing or Attempting to Flee Domestic Violence ☐ Emergency Shelter ☐ Rapid Rehousing ☐ Homeless Prevention	Any individual or family who: • Is fleeing, or is attempting to flee domestic violence; sexual assault, stalking, or human trafficking; • Experienced attempted use of physical abuse or sexual abuse, or a pattern of any other coercive behavior • Experienced verbal, psychological, economic, or technological abuse that may or may not constitute criminal behavior • Has no other residence; <u>and</u> • Lacks the resources or support networks to obtain other permanent housing.
At Risk of Homelessness ☐ Emergency Shelter ☐ Homeless Prevention	• Individual or family with annual income below 30% AMI; <u>and</u> • The individual or family lacks the resources or support networks needed to obtain other permanent housing; and meets one of the following: • Has moved because of economic reasons 2 or more times during the past 60 days • Is living in the home of another because of economic hardship

ESG Verification of Housing Status

Page 1 of 5

by their current housing or living situation will be terminated within 21 day after

ment unit in which there reside more than two persons or lives in a larger persons reside per room, as defined by the U.S. Census Bureau

ssociated with instability and an increased risk of homelessness, as identified in

defining homelessness or the At Risk of Homelessness definition

obtain permanent housing: ☐ Yes: ☐ No

Date: _____

ESG Verification of Housing Status

Page 2 of 5

tion to support client's verification of housing status

REQUIREMENTS

Category 3	Category 4	At Risk of Homelessness
For other Federal statutes	Fleeing/Attempting to Flee DV	At Risk of Homelessness
by non-profit, local government that the seeking assistance met mess criteria under al statute; and of no PH in last 60 tion by the head of d any available ocumentation, that ved two (2) or more ast 60 days; quired form included on of special needs barriers.	For victim service providers: • Oral statement by individual or head of household which states; they are fleeing; they have no other subsequent residence and lack resources. (Statement must be documented by self-certification or intake worker). For non-victim service providers: • Oral statement by individual or head of household seeking assistance (documented by self-certification (complete required form included below) or intake worker). The family safety must not be jeopardized. • Certification by head of household that no subsequent residence has been identified; and • Self-Certification or other written documentation, the household lacks financial resources and support networks to obtain other permanent housing. (Use as a last resort) (complete required form included below)	• Evidence that they lack financial resources • Documentation of #/dates of moves • 21-day notice • Documentation of housing (hotel/motel, institution, SRO, etc) • Documentation of characteristics associated with housing instability and increased risk of homelessness

ESG Verification of Housing Status

Page 3 of 5

3. Attach Supporting Documentation of Housing Status

Homeless Category 2: Imminent Risk	Homeless Category 3: Homeless under other Federal Statutes	Category 4: Fleeing or Attempting to Flee DV	At Risk of Homelessness
1. Must show loss of housing within 14 days of date of ESG application - Court order from an eviction; or Hotel and motel exit-evidence that they lack the financial resources; OR Last resort - Documented and verified oral statement; AND Certification that no subsequent residence has been identified; AND Self-certification or other written documentation that household lack the financial resources and support necessary to obtain permanent housing (PH). 2. Certification that no residence has been identified and family lacks the resources and support networks needed to obtain other permanent housing	1. Certification by non-profit, local and state government that the household seeking assistance met the homelessness criteria under another federal statute; AND Certification of no PH in last 60 days; AND Self-Certification by the head of household and any available supporting documentation, that they have moved two (2) or more times in the past 60 days; AND Documentation of special needs or 2 or more barriers.	1. Oral statement by individual or head of household which states; they are fleeing; they have no other subsequent residence and lack resources. (Statement must be documented by self-certification or intake worker).	Paragraph 1 - 1. Evidence family is below 30% AMI 2. The program participant's certification on a form that they have insufficient financial resources and support networks 3. Documentation of #/dates of moves OR 21-day notice OR Documentation of housing (hotel/motel, institution, SRO, etc) or Documentation of characteristics associated with housing instability and increased risk of homelessness Paragraph 2 or 3 - 1. Certification of the child or youth's homeless status by the agency or organization responsible for administering assistance under one of the other Federal Statutes

3. Self-Certification of Housing Status Form

ESG SELF-CERTIFICATION OF HOUSING STATUS FORM

Note: Self-Certification should be used as last resort if third party documentation is not obtainable.

Check one:

☐ I am a household **without** dependent children (complete one form for each adult in the household)

☐ I am a household **with** dependent children (complete one form for the household)

Number of persons in the household: _____

This is to certify that the above-named individual or household is currently homeless or at-risk of homelessness, based on the following and other indicated information and the signed declaration by the applicant.

CATEGORY 1

Check only one: I am an individual or family who lacks a fixed, regular, and adequate nighttime residence as follows:

☐ My Primary nighttime residence is a public or private place not meant for human habitation;

☐ I [and my children] are living in a publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels/motels paid for by charitable organizations or by federal, state, and local government programs);

☐ I am exiting an institution where I have resided for 90 days or less and resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

CATEGORY 2

☐ I am an individual or family at imminent risk of losing my primary nighttime residence and have all of the following circumstances:

- My residence will be lost within 14 days of the date of this notice; and
- No subsequent residence has been identified; and
- I (and my children) lack the resources or support networks needed to obtain permanent housing

CATEGORY 3

☐ I am an unaccompanied youth under 25 years of age, or a family with children and youth, who do not otherwise qualify as homeless, but meet all of the following circumstances:

- I am defined as homeless under another federal statute; and
- I have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to this application for assistance; and
- I have experienced persistent instability as measured by two moves or more during the preceding 60 days; and I expect to continue in such status for an extended period of time due to special needs or barriers defined follows:

ESG Verification of Housing Status

Page 4 of 5

CATEGORY 4

☐ I am an individual or family that:

- Is fleeing, or is attempting to flee domestic violence; sexual assault, stalking, or human trafficking;
- Experienced attempted use of physical abuse or sexual abuse, or a pattern of any other coercive behavior
- Experienced verbal, psychological, economic, or technological abuse that may or may not constitute criminal behavior
- Have no other residence; and
- Lack the resources or support networks to obtain other permanent housing

At Risk of Homelessness

☐ I am an individual or family:

- With an annual income below 30% AMI; and
- Who lacks the resources or support networks needed to obtain other permanent housing; and
- Meets at least one of the other criteria set forth in the definition of At Risk of Homelessness (24 CFR 576.2)

I certify that the information above I have provided in applying for ESG assistance is true, accurate and complete.

ESG Client Signature: _____ Date: _____

For official use only:

Staff Certification

I understand that third-party verification is the preferred method of certifying homelessness or risk for homelessness for an individual/household who is applying for ESG assistance. I understand self-certification is only permitted when I have attempted to but cannot obtain third party verification.

Documentation of attempt(s) made for third-party verification (for street outreach, rapid rehousing, and homelessness prevention; not required for emergency shelter):

Date	Type of Attempt (oral, written, email etc.)	Agency, person, entity contacted	Outcome

ESG Staff Signature: _____ Date: _____

ESG Verification of Housing Status

Page 5 of 5

- If source documents and third-party verification are not available
- Optional form to self-certify housing status
- This is found as pages 4 & 5 of the ESG Verification of Housing Status Form

3. Statement of Insufficient Resources

ESG STATEMENT OF INSUFFICIENT RESOURCES

ESG Client Name: _____

ESG HMIS / Comparable Database Number: _____

Date: _____

Check one:

☐ 3-month

☐ 6-month

☐ 9-month

☐ 12-month

☐ Other: _____

When evaluating for Rapid Re-housing and Homelessness Prevention assistance it is required that the participant certifies that they continue to lack the resources necessary to remain and/or maintain in stable housing without ESG assistance. This form should be completed at every evaluation of the participant's eligibility.

I, _____, certify that I lack sufficient resources and support networks necessary to retain and/or maintain housing without ESG assistance.

PROGRAM PARTICIPANT NAME

ESG Client Certification: _____

Date: _____

ESG staff has completed due diligence to ensure that the above program participant does not have sufficient resources and support networks necessary to retain and/or maintain housing without ESG assistance.

ESG Staff Certification: _____

Date: _____

ESG Statement of Insufficient Resources Page 1 of 1

- Use this form to show participant and/or family has no other resources for to maintain housing stability
- The “Verification of Housing Status Form” and “Self-Certification of Housing Status Form” has this declaration but if you don’t use those, you can use this form to satisfy that requirement
- Written letter from the client and/or case manager can be accepted but it should include the same language.

4. Annual income is below 30% AMI at program entry

ESG Client File Checklist / HOMELESSNESS PREVENTION 

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. _____ **Intake form/Initial Assessment** identifying client's most pressing needs 24 CFR 576.401(a)
All of the following must be explained/provided to client at project entry.

- ☐ Grievance & Termination Policy
- ☐ Program rules
- ☐ Right to Fair Housing
- ☐ Releases of Information for HMIS and other entities on behalf of participant
- ☐ "Protect Your Family from Lead in Your Home" pamphlet
- ☐ "Notice of Occupancy Rights under the Violence Against Women Act" HUD Form 5380

3. _____ **ESG Verification of Homeless Status Form** with supporting documentation
Must follow documentation requirements outlined in 24 CFR 576.103 & 24 CFR 576.500 (b) & (c)

- ☐ At-Risk of Homelessness
- ☐ Imminent risk of homelessness (Category 2 Homeless)
- ☐ Homeless under other federal statutes (Category 3 Homeless)
- ☐ Fleeing/attempting to flee domestic violence (Category 4 Homeless)

4. _____ **Documentation that participant is at or below 30% AMI at program entry** 24 CFR 576.500(e) & 24 CFR 576.401(c)

- ☐ ESG Income & Asset Calculation Worksheet **AND**
- ☐ Source documentation

*Include the following **ONLY IF** source documents are unavailable:*

- ☐ ESG Third-Party Verification of Income **AND**
- ☐ ESG Self-Certification of Income Form

5. _____ **Record of ESG services provided** while in HP program 24 CFR 576.105, 24 CFR 576.106, 24 CFR 576.500(i)

<u>Financial Assistance</u>	<u>Rental Assistance</u>	<u>Stabilization Services</u>
☐ Rental application fees	☐ Short-term Rental Assistance	☐ Housing search and placement
☐ Security deposit	☐ Medium-term Rental Assistance	☐ Housing stability case management
☐ Last month's rent	☐ Rental arrears	☐ Mediation
☐ Utility deposits/payments		☐ Legal services
☐ Moving costs		☐ Credit repair

6. _____ **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. Referral Tracking Tool can be found on THDA's ESG website.

7. _____ **Case notes documenting case management meetings**, at least monthly 24 CFR 576.401(e)(1)(i)

ESG Client File Checklist – Homelessness Prevention Page 1 of 6

- Include in the household's file the annual income determination of all household members over the age of 18. To know what to include in income calculation, [Income and Asset Inclusions and Exclusions can be found here.](#)
- Proper supporting documentation proving annual income must also be included in the file.
- Area Median Income (AMI) is defined by HUD and updated annually. HUD income limits for the client's area can be found here - [Income Limits | HUD USER](#)
- Do not confuse 30% AMI charts with Extremely Low Income charts on the HUD website. Using ELI may cause some participants who would not be eligible to appear to be.
- Optional forms to use:
 - [You may use the "ESG Income and Asset Calculation Worksheet" that is linked here and found on our ESG website.](#)
 - You may also use the [CPD Income Eligibility Calculator](#) to show income determination

To Access HUD's 30% AMI Income Limits

- Access this link - [Income Limits | HUD USER](#).
- Select appropriate year. Then go to the Data tab.
- Click the Excel link to open HUD's 30% Income Limits
- Year switches to 2026 on June 1st, 2026

The screenshot shows the HUD Income Limits website interface. A red box highlights the year selection menu at the top, which includes buttons for 2026, 2025, 2024, 2023, 2022, and a 'Year' dropdown. A red arrow points to this menu. Below the year selection, a red box highlights the 'Data' tab in the navigation bar, with a red arrow pointing to it. The main content area is titled '2026 Data' and indicates it is 'Effective May 01, 2026'. It lists three data categories, each with a link to 'MS EXCEL':

- Data for Section 8 Income Limits in [MS EXCEL](#)
- Data for Section 221(d)(3) BMIR, Section 235, and Section 236 Income Limits in [MS EXCEL](#)
- Data for National and Non-Metro Very Low Income Limits in [MS EXCEL](#)

Below this, it indicates 'Effective June 01, 2026' and lists a fourth category:

- Data for Emergency Solutions Grant (ESG) – Tables for HUD 30% Income Limits. These are 30% Income Limits, calculated with high and low housing cost adjustments, state non-metropolitan minimum but without the increases for poverty guidelines in the Section 8 Extremely Low Family Incomes. (in [EXCEL](#))

A red box highlights the '(in EXCEL)' link in the last bullet point, with a red arrow pointing to it.

4. Declaration that Income is at or below 30% AMI

ESG INCOME AND ASSET CALCULATION WORKSHEET

CLIENT NAME: _____ DATE: _____

HMIS/ DV ID #: _____

Check one:

- ☐ Initial
- ☐ 3-month
- ☐ 6-month
- ☐ 9-month
- ☐ 12-month
- ☐ Other: _____

This worksheet is to be utilized by Rapid Rehousing and Prevention providers. **Acceptable replacement for this form, is use of the HUDExchange CPD Income Calculator.** The income calculator can be accessed through this link: <https://www.hudexchange.info/incomecalculator/>. If the Subrecipient uses the CPD Income Calculator, the income calculation must be printed and added to the client file. Additional information and training webinar on how to use the CPD Income Calculator can be found here: <https://www.hudexchange.info/trainings/courses/using-the-income-calculator-to-determine-annual-income-webinar1/>

- For Rapid Rehousing income certification must be completed after financial assistance has been provided for one year.
- For Prevention, income certification is to be completed at intake as a part of eligibility screening, and as part of the re-evaluation process every three months.
- For Rapid Rehousing and Prevention, the client's household income must be at or below 30% of AMI.
 - Under the ESG program, income eligibility is based on the HUD income limits in effect at the time of income verification. Income eligibility is not based on HUD income limits that correspond with the grant year under which the ESG funds were awarded. Income limits can be found here: <https://www.huduser.gov/portal/datasets/il.html>

Source documentation of income and assets must be attached to this worksheet (e.g., wage statement, unemployment compensation statement, public benefits statement, bank statement). *To the extent that source documents are unobtainable*, a written statement by the relevant third party (e.g., employer, government benefits administrator) or the written certification by intake staff of the oral verification by the relevant third party of the income the program participant received over the most recent period for which representative data is available. *To the extent that source documents and third-party verification are unobtainable*, the written certification by the program participant of the amount of income the program participant received for the most recent period representative of the income that the program participant is reasonably expected to receive over the 3-month period following the evaluation.

Income			
Household Member	Source of Income	Calculation: Gross Amount x Pay Period/Frequency =	Annual Income

Assets					
Household Member #	Asset Type	Cash Value of Asset	Interest Rate (%)	Actual Annual Income	Description/Notes

- Total Income \$ _____
- Total Income from Assets \$ _____
- Imputed income from assets
Calculate only if the Net Cash Value of Assets is greater than \$5,000.
Multiply the total cash value of all assets by .004. \$ _____
- Total Annual Income (add Line 1 plus the greater of Lines 2 or 3) \$ _____
- 30% of AMI for your area \$ _____
Household is income ineligible if line 4 is greater than line 5.

By signing below, I certify that this information is complete and accurate for my household. I agree to provide, upon request, documentation on all income sources to the HUD Grantee/Program Administrator.

ESG Client Signature: _____ Date: _____

Verified by ESG Staff: _____ Date: _____

- Client file must outline the calculation of all sources of income and assets the household receives.
- One way to do this would be with our ESG Income and Asset Calculation Worksheet.
- A case note only stating the household's total annual income would not be enough to satisfy this requirement
- Must also include proper supporting documentation (next slide) proving annual income that is reported

4. Supporting Documentation of Income below 30% AMI

FIRST - PREFERRED METHOD OF PROVING ANNUAL INCOME	SECOND - ONLY IF SOURCE DOCUMENTATION CANNOT BE OBTAINED	LAST RESORT
Source Documents	Third-Party Verification	Self-Certification
• Pay stubs • Unemployment compensation • Public benefits statement • Bank statement • Other statement or declaration from official source	• A written statement by a relevant third-party (employer or government benefits admin) of client's income • "Third-Party Verification of Income" form linked here & on our website for third-parties to fill out to certify income. • Case managers must record all attempts of due diligence to obtain source documentation for client file	• Written certification by the client of the amount of income they have received for the most recent period and includes the income that the client is reasonably expected to receive over the next 3-month period • "ESG Self-Certification of Income" is linked here and can be used as a way for a client to self-certify their income. • Case managers must record all attempts of due diligence to obtain source and third-party documentation for client file

4. Third-Party Verification of Income

ESG THIRD-PARTY VERIFICATION OF INCOME

ESG Client Name: _____

Instructions for Employer/Payment Source Representative: This is to certify the income received by the above-named individual for purposes of participating in the Emergency Solutions Grant program. This information will be used only to determine the eligibility and level of benefit(s) the household may receive. **Complete only the selected section below that includes an authorization to release information.**

Check one:

- ☐ Initial
- ☐ 3-month
- ☐ 6-month
- ☐ 9-month
- ☐ 12-month
- ☐ Other: _____

Please return this form to:

Name & Title: _____ Phone: _____
Address: _____ Fax: _____
Email: _____

☐ Employment Income

ESG Client Release: I hereby authorize the release of the following employment information.
ESG Client Signature: _____ Date: _____

Employer representative to complete this section:
The person named above is employed by _____ since _____. He/she is paid \$ _____ on a _____ basis and is currently working an average of _____ hours per _____.
Additional compensation please specify (if any): _____
Probability of continued employment: _____

Authorized Employer Representative Signature: _____ Date: _____
Name, Title: _____
Address and Phone: _____
If third-party verification cannot be obtained, oral verification of the above information was obtained by ESG staff.
ESG Staff Authorization: _____ Date: _____

☐ Payments and/or Benefit Income (complete one form for each distinct source of income for person named above)

CHECK ONE:

☐ Social Security/SSI	☐ Pension/Retirement	☐ TANF
☐ Public Assistance	☐ Unemployment Compensation	☐ Workers Compensation
☐ Alimony Payments	☐ Foster Care Payments	☐ Child Support Payments
☐ Armed Forces Income		
☐ Other (pls. specify): _____		

ESG Client release: I hereby authorize the release of the following payment and/or benefit information.
ESG Client Signature: _____ Date: _____

Payment source representative to complete this section:
Payments or benefits in the amount of \$ _____ are paid on a _____ basis. The expected duration of the payments or benefits is _____.
Authorized Payment Source Representative Signature: _____ Date: _____
Name, Title: _____
Address and Phone: _____
If third-party verification cannot be obtained, oral verification of the above information was obtained by ESG staff.
ESG Staff Authorization: _____ Date: _____

ESG Third-Party Verification of Income Page 1 of 1

- Only applicable if obtaining source documents is not possible. Optional form to satisfy third-party verification.
- Other forms of documentation accepted:
 - Letter/email directly from third-party detailing amount of source, income, frequency and expected duration. For employers, include the rate and amount of hours worked per pay period.
 - Case manager case note explaining that they spoke directly to the third-party to confirm the client's income. This case note must also record due diligence of obtaining source documentation from the third-party. This can also be noted using this form.

5. Record of Services Provided

ESG Client File Checklist / HOMELESSNESS PREVENTION



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. _____ Intake form/Initial Assessment identifying client's most pressing needs 24 CFR 576.401(a)
All of the following must be explained/provided to client at project entry.
☐ Grievance & Termination Policy
☐ Program rules
☐ Right to Fair Housing
☐ Releases of Information for HMIS and other entities on behalf of participant
☐ "Protect Your Family from Lead in Your Home" pamphlet
☐ "Notice of Occupancy Rights under the Violence Against Women Act" HUD Form 5380

3. _____ ESG Verification of Homeless Status Form with supporting documentation
Must follow documentation requirements outlined in 24 CFR 576.103 & 24 CFR 576.500 (b) & (c)
☐ At-Risk of Homelessness
☐ Imminent risk of homelessness (Category 2 Homeless)
☐ Homeless under other federal statutes (Category 3 Homeless)
☐ Fleeing/attempting to flee domestic violence (Category 4 Homeless)

4. _____ Documentation that participant is at or below 30% AMI at program entry 24 CFR 576.500(e) & 24 CFR 576.401(c)
☐ ESG Income & Asset Calculation Worksheet AND
☐ Source documentation

Include the following ONLY IF source documents are unavailable:
☐ ESG Third-Party Verification of Income AND
☐ ESG Self-Certification of Income Form

5. _____ Record of ESG services provided while in HP program 24 CFR 576.105, 24 CFR 576.106, 24 CFR 576.500(i)

<u>Financial Assistance</u>	<u>Rental Assistance</u>	<u>Stabilization Services</u>
☐ Rental application fees	☐ Short-term Rental Assistance	☐ Housing search and placement
☐ Security deposit	☐ Medium-term Rental Assistance	☐ Housing stability case management
☐ Last month's rent	☐ Rental arrears	☐ Mediation
☐ Utility deposits/payments		☐ Legal services
☐ Moving costs		☐ Credit repair

6. _____ 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. Referral Tracking Tool can be found on THDA's ESG website.

7. _____ Case notes documenting case management meetings, at least monthly 24 CFR 576.401(e)(1)(i)

ESG Client File Checklist – Homelessness Prevention

Page 1 of 6

- Services provided on an **individual basis** should be tracked in each client's file
- Case notes should always outline what assistance is being provided to the client
- However you track this in the client's file, make sure that it is clear and concise
- For participants who receive ESG funding, supporting documentation should also be collected and inserted in the client's chart as a part of #9 of the Homelessness Prevention Client File Checklist

Tennessee Housing
Development Agency

6. Referral & Connection

ESG Client File Checklist / HOMELESSNESS PREVENTION



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. _____ Intake form/Initial Assessment identifying client's most pressing needs 24 CFR 576.401(a)
All of the following must be explained/provided to client at project entry.
☐ Grievance & Termination Policy
☐ Program rules
☐ Right to Fair Housing
☐ Releases of Information for HMIS and other entities on behalf of participant
☐ "Protect Your Family from Lead in Your Home" pamphlet
☐ "Notice of Occupancy Rights under the Violence Against Women Act" HUD Form 5380

3. _____ ESG Verification of Homeless Status Form with supporting documentation
Must follow documentation requirements outlined in 24 CFR 576.103 & 24 CFR 576.500 (b) & (c)
☐ At-Risk of Homelessness
☐ Imminent risk of homelessness (Category 2 Homeless)
☐ Homeless under other federal statutes (Category 3 Homeless)
☐ Fleeing/attempting to flee domestic violence (Category 4 Homeless)

4. _____ Documentation that participant is at or below 30% AMI at program entry 24 CFR 576.500(e) & 24 CFR 576.401(c)
☐ ESG Income & Asset Calculation Worksheet AND
☐ Source documentation

Include the following ONLY IF source documents are unavailable:
☐ ESG Third-Party Verification of Income AND
☐ ESG Self-Certification of Income Form

5. _____ Record of ESG services provided while in HP program 24 CFR 576.105, 24 CFR 576.106, 24 CFR 576.500(i)

Financial Assistance	Rental Assistance	Stabilization Services
☐ Rental application fees	☐ Short-term Rental Assistance	☐ Housing search and placement
☐ Security deposit	☐ Medium-term Rental Assistance	☐ Housing stability case management
☐ Last month's rent	☐ Rental arrears	☐ Mediation
☐ Utility deposits/payments		☐ Legal services
☐ Moving costs		☐ Credit repair

6. _____ 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. Referral Tracking Tool can be found on THDA's ESG website.

7. _____ Case notes documenting case management meetings, at least monthly 24 CFR 576.401(e)(1)(i)

ESG Client File Checklist – Homelessness Prevention

Page 1 of 6

As a part of case management, ESG staff should assist each program participant, as necessary, to obtain:

1. 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
2. Other Federal, State, local, and private assistance available to assist the program participant in obtaining housing stability, including:
 - A. Medicaid (42 CFR chapter IV, subchapter C)
 - B. Supplemental Nutrition Assistance Program (7 CFR parts 271– 283);
 - C. Women, Infants and Children (WIC) (7 CFR part 246);
 - D. Federal-State Unemployment Insurance Program (20 CFR parts 601– 603, 606, 609, 614–617, 625, 640, 650);
 - E. Social Security Disability Insurance (SSDI) (20 CFR part 404);
 - F. Supplemental Security Income (SSI) (20 CFR part 416);
 - G. Child and Adult Care Food Program (42 U.S.C. 1766(t) (7 CFR part 226));
 - H. Other assistance available under the programs listed in § 576.400(c).

- Optional form to use:
 - [Referral Tracking Tool](#) can record referrals and connections found on our [website and linked here](#).


Tennessee Housing
Development Agency

6. Referral Tracking Tool

ESG Client File Checklist / HOMELESSNESS PREVENTION



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. _____ Intake form/Initial Assessment identifying client's most pressing needs 24 CFR 576.401(a)
All of the following must be explained/provided to client at project entry.
☐ Grievance & Termination Policy
☐ Program rules
☐ Right to Fair Housing
☐ Releases of Information for HMIS and other entities on behalf of participant
☐ "Protect Your Family from Lead in Your Home" pamphlet
☐ "Notice of Occupancy Rights under the Violence Against Women Act" HUD Form 5380

3. _____ ESG Verification of Homeless Status Form with supporting documentation
Must follow documentation requirements outlined in 24 CFR 576.103 & 24 CFR 576.500 (b) & (c)
☐ At-Risk of Homelessness
☐ Imminent risk of homelessness (Category 2 Homeless)
☐ Homeless under other federal statutes (Category 3 Homeless)
☐ Fleeing/attempting to flee domestic violence (Category 4 Homeless)

4. _____ Documentation that participant is at or below 30% AMI at program entry 24 CFR 576.500(e) & 24 CFR 576.401(c)
☐ ESG Income & Asset Calculation Worksheet AND
☐ Source documentation

Include the following ONLY IF source documents are unavailable:
☐ ESG Third-Party Verification of Income AND
☐ ESG Self-Certification of Income Form

5. _____ Record of ESG services provided while in HP program 24 CFR 576.105, 24 CFR 576.106, 24 CFR 576.500(i)

<u>Financial Assistance</u>	<u>Rental Assistance</u>	<u>Stabilization Services</u>
☐ Rental application fees	☐ Short-term Rental Assistance	☐ Housing search and placement
☐ Security deposit	☐ Medium-term Rental Assistance	☐ Housing stability case management
☐ Last month's rent	☐ Rental arrears	☐ Mediation
☐ Utility deposits/payments		☐ Legal services
☐ Moving costs		☐ Credit repair

6. _____ 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. Referral Tracking Tool can be found on THDA's ESG website.

7. _____ Case notes documenting case management meetings, at least monthly 24 CFR 576.401(e)(1)(i)

ESG Client File Checklist – Homelessness Prevention

Page 1 of 6

- Available in PDF and WORD formats on the website
- Edit this how it best suits your program and case management
- Case notes can also satisfy this requirement
- However you track this, make sure it is clear and concise


Tennessee Housing
Development Agency

7. Record of Case Management Meetings

ESG Client File Checklist / HOMELESSNESS PREVENTION



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. _____ Intake form/Initial Assessment identifying client's most pressing needs 24 CFR 576.401(a)
All of the following must be explained/provided to client at project entry.
☐ Grievance & Termination Policy
☐ Program rules
☐ Right to Fair Housing
☐ Releases of Information for HMIS and other entities on behalf of participant
☐ "Protect Your Family from Lead in Your Home" pamphlet
☐ "Notice of Occupancy Rights under the Violence Against Women Act" HUD Form 5380

3. _____ ESG Verification of Homeless Status Form with supporting documentation
Must follow documentation requirements outlined in 24 CFR 576.103 & 24 CFR 576.500 (b) & (c)
☐ At-Risk of Homelessness
☐ Imminent risk of homelessness (Category 2 Homeless)
☐ Homeless under other federal statutes (Category 3 Homeless)
☐ Fleeing/attempting to flee domestic violence (Category 4 Homeless)

4. _____ Documentation that participant is at or below 30% AMI at program entry 24 CFR 576.500(e) & 24 CFR 576.401(c)
☐ ESG Income & Asset Calculation Worksheet AND
☐ Source documentation

Include the following ONLY IF source documents are unavailable:
☐ ESG Third-Party Verification of Income AND
☐ ESG Self-Certification of Income Form

5. _____ Record of ESG services provided while in HP program 24 CFR 576.105, 24 CFR 576.106, 24 CFR 576.500(i)

Financial Assistance	Rental Assistance	Stabilization Services
☐ Rental application fees	☐ Short-term Rental Assistance	☐ Housing search and placement
☐ Security deposit	☐ Medium-term Rental Assistance	☐ Housing stability case management
☐ Last month's rent	☐ Rental arrears	☐ Mediation
☐ Utility deposits/payments		☐ Legal services
☐ Moving costs		☐ Credit repair

6. _____ 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. Referral Tracking Tool can be found on THDA's ESG website.

7. _____ Case notes documenting case management meetings, at least monthly 24 CFR 576.401(e)(1)(i)

ESG Client File Checklist – Homelessness Prevention

Page 1 of 6

- The client's file must show the following:
 - The case manager met with the client not less than once per month to assist the program participant in ensuring long-term housing stability; and
 - A housing plan was developed with 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
- Case notes can show monthly case management meetings with clients and the housing plan
- To develop a Housing Stability Plan - optional forms to use:
 - "ESG Housing & Critical Needs Assessment" will help to understand your client's barriers and create goals.
 - "ESG Housing Stability Plan" is to be used in conjunction with the Needs Assessment to track client progress while in the program.


Tennessee Housing
Development Agency

7. ESG Housing and Critical Needs Assessment

ESG HOUSING & CRITICAL NEEDS ASSESSMENT SUMMARY

Client Name:	Initial Assessment Date:		/		/	
HMIS/DV ID:	Revised Assessment Date:		/		/	
Case Manager Name:	Revised Assessment Date:		/		/	

INSTRUCTIONS:

Staff and participants can use this form to summarize and document participant information already obtained during intake, initial assessment, and ongoing assessments. This Summary form helps to identify key strengths, barriers, and participant preferences, as well as the types of assistance the Rehousing program may provide. *This completed form will aide in the creation of the Housing Stability Plan.*

This form may be updated when significant new information is obtained during regular case management contacts (which should occur once per month at minimum) OR staff may document new information in case notes. Separate case notes are still required. When a revised Assessment Summary is completed, staff and participants may choose to only update sections with new or updated information or an entirely new Summary form may be completed.

Information summarized below can be used as the basis for determining the type, amount and duration of rehousing program assistance needed, from your program or another source, to secure and stabilize in housing and as a basis for the **Housing Stability Plan**.

INCOME/EXPENSES/OTHER RESOURCES				
Current Total Household Monthly Income: \$		Current Amount Available for Monthly Rent/Utilities:		
Current Total Household Monthly Expenses: \$		\$		
IF CURRENTLY RENTING: Percent of income spent on housing (rent and utilities) (check one)				
☐ 30% or less ☐ 31-50% ☐ 51%-70% ☐ 71% or more ☐ Not Assessed				
OTHER INCOME-RELATED:	Yes	No	Unknown	Notes
Has ongoing, permanent housing subsidy (e.g., Section 8)?				
Has steady, full-time employment?				
Receives TANF, SSI, SSDI, other disability or cash benefits they qualify for?				
Receives SNAP/Food Stamps (if qualified)?				
Has high school diploma or GED?				
Sufficient English Proficiency and/or Literacy?				
Has reliable transportation?				
Has reliable/affordable/available childcare?				
Has health insurance?				

NOTES:

TENANT SCREENING BARRIERS				
POTENTIAL IMPACT:	Low or No Impact on Tenant Screening	Moderate Impact on Tenant Screening	Major Impact on Tenant Screening	Unknown Impact on Tenant Screening
Income:	☐ Current monthly income is more than 3 times higher than expected monthly rent	☐ Current monthly income is at least 2 but not more than 3 times higher than expected monthly rent	☐ Current monthly income is less than 2 times expected monthly rent (including -0- current income)	☐ Not assessed
Rental History:	☐ 0 evictions	☐ 1 prior eviction	☐ Multiple prior evictions	☐ No rental history or not assessed
	☐ Good prior landlord references	☐ 1 poor prior landlord reference	☐ Multiple poor landlord references	☐ No rental history or not assessed
Credit History:	☐ Familiar with rental requirements/expectations	☐ Some familiarity with rental requirements/expectations	☐ No familiarity despite prior rental experience	☐ Not assessed
	☐ Good credit history/score	☐ Fair credit history/score	☐ Poor credit history/score	☐ Credit not established or not assessed
Arrears:	☐ No past rent and/or utility arrears	☐ Small to moderate amount of rent and/or utility arrears	☐ Large amount of rent and/or utility arrears; may include balance larger than is eligible for community resources	☐ Not assessed
Criminal Record:	☐ No prior felonies or serious misdemeanors	☐ 1 prior felony or serious misdemeanor	☐ Multiple prior felonies and/or serious misdemeanors	☐ Not assessed

NOTES:

- Available in WORD format on the website
- We encourage editing this form to fit the needs of your program
- This form is to aid in creating a Housing Stability Plan

7. ESG Housing and Critical Needs Assessment

- Pages 3 and 4

HOUSING SEARCH AND/OR RETENTION BARRIERS				
POTENTIAL IMPACT:	Low or No Impact on Housing Search/Retention	Moderate Impact on Housing Search/Retention	Major Impact on Housing Search/Retention	Unknown Impact on Housing Search/Retention
Personal Support Network:¹	☐ Family, friend, and/or other support network available to help with housing needs	☐ Minimal family, friend, and/or other support network available to help with housing needs	☐ No family, friend, and/or other support network available to help with housing needs ☐ Family, friends, other connections have caused housing issues in the past	☐ Not assessed
Community Supports:	☐ Familiar with and knows how to access community resources that can help with housing needs	☐ Some knowledge of community resources that can help with housing needs	☐ Limited to no knowledge of community resources that can help with housing needs	☐ Not assessed
Physical Health:	☐ No physical health care needs that impact housing search/retention	☐ Physical health care issues may impact housing search/retention (based on past or current experience)	☐ Physical health care issues will likely significantly impact housing search/retention (based on past or current experience)	☐ Not assessed
Mental Health:	☐ No mental health needs that impact housing search/retention	☐ Mental health issues may impact housing search/retention (based on past or current experience)	☐ Mental health issues will likely significantly impact housing search/retention (based on past or current experience)	☐ Not assessed
Substance Use (Behavioral Health):	☐ No behavioral health care needs that impact housing search/retention	☐ Behavioral health care/substance use issues may impact housing search/retention (based on past or current experience)	☐ Behavioral health care/substance use issues will likely significantly impact housing search/retention (based on past or current experience)	☐ Not assessed
Family Relationships:	☐ No current family relationship issues that impact housing search/retention	☐ Family relationship issues may impact housing search/retention (based on past or current experience)	☐ Family relationship issues will likely significantly impact housing search/retention (based on past or current experience)	☐ Not assessed

¹ Note that while a participant may have personal supports available to help with housing needs, to be eligible for ESG or ESG-CV rehousing assistance participants must not have sufficient resources or support networks immediately available to prevent them from becoming literally homeless or to regain safe, stable housing.

HOUSING SEARCH AND/OR RETENTION BARRIERS (continued)				
POTENTIAL IMPACT:	Low or No Impact on Housing Search/Retention	Moderate Impact on Housing Search/Retention	Major Impact on Housing Search/Retention	Unknown Impact on Housing Search/Retention
Domestic Violence (DV)/ Intimate Partner Violence (IPV):	☐ No current or past experience with DV/IPV that impact housing search/retention ☐ Current or past DV/IPV, safety plan in place and no impact on housing search/retention	☐ Currently experiencing DV/IPV that may impact housing search/retention (based on past or current experience)	☐ Currently fleeing or attempting to flee DV/IPV; will likely significantly impact housing search/retention (based on past or current experience)	☐ Not assessed
Neighbor Relationships:	☐ No current issues with neighbors that impact housing search/retention	☐ Neighbor relation issues may impact housing search/retention (based on past or current experience)	☐ Neighbor relation issues will likely significantly impact housing search/retention (based on past or current experience)	☐ Not assessed
Knowledge of Landlord/Tenant Rights and Responsibilities:	☐ Very knowledgeable of rights/responsibilities as a tenant	☐ Some knowledge of rights/responsibilities as a tenant	☐ Limited to no knowledge of rights/responsibilities as a tenant	☐ Not assessed

NOTES:

7. ESG Housing and Critical Needs Assessment

HOUSING REQUIREMENTS AND PREFERENCES				
Location, in order of preference:		Minimum Unit Size:		
(1) _____		☐ Studio		
(2) _____		☐ One bedroom		
(3) _____		☐ Two bedrooms		
(4) _____		☐ Three bedrooms		
(5) _____		☐ Other: _____		
OTHER HOUSING AND LOCATION NEEDS/PREFERENCES:	Yes	No	Unknown	Notes
Close to public transportation				
Close to childcare provider(s)				
Close to specific school(s), college, and/or training/education provider (identify)				
Close to clinic/medical facility/treatment facility (identify)				
Close to faith/religious organization, church, mosque, synagogue, etc.				
Close to playground, park, and/or greenspace				
Disability or other site/building/unit accommodation(s)				
Accommodates pet, service/support animal				
Other key preferences				
NOTES:				

ESG Housing & Critical Needs Summary Page 5 of 9

NON-HOUSING CRITICAL SERVICE NEEDS				
REHOUSING PROGRAM SUPPORT NEEDED/DESIRED?	Yes	No	Unknown	Notes
Food and/or daily nutrition needs				
Clothing				
Household furnishings				
Household supplies (e.g., cleaning supplies, paper products)				
Physical healthcare needs				
Mental and/or behavioral healthcare needs				
Child-related needs, including education and child welfare-related needs				
Other (identify):				
Other (identify):				
NOTES:				

ESG Housing & Critical Needs Summary Page 6 of 9

- Pages 5 and 6
- Not pictured:
- Pages 7 through 9 includes a matrix to gauge where the participant falls on each need
- Page 9 has a certification that all participants and case managers must sign

7. ESG Housing Stability Plan

ESG HOUSING STABILITY PLAN

Client Name:
HMIS/DV ID:
Case Manager Name:
Case Manager Phone number:
Case Manager E-mail:

Plan Date: / /
Next Scheduled Review: / /

This plan is focused on the following general goal (select one based on current situation/needs):

- ☐ Helping me/my family find safe, stable housing AND/OR immediately stabilize in my current housing
- ☐ Helping me/my family stabilize in new or current housing once secured
- ☐ Helping me/my family continue to stay in safe and stable housing after program exit

Staff and participants should work together to create a Housing Stability Plan to meet the above goal. Staff should keep this plan in the participant case file and provide a copy to participants for reference.

At minimum, the Housing Stability Plan should be created following initial intake and assessment to support housing search and placement OR immediate stabilization in current housing. Ideally, the Housing Stability Plan should then be updated once housing is secured (current or new), and again once housing is stable and just prior to exit to ensure that the client is able to remain in stable housing on their own. *ESG Housing and Critical Needs Assessment Summary can be used as an aide in creation of the Housing Stability Plan.*

NOTE: At minimum, case workers should be in contact with participants at least monthly and record a summary of every participant contact in case notes and maintain these notes in the participant case file. Case notes should be kept separate from this Housing Stability Plan.

WHAT IS YOUR OVERALL GOAL FOR HOUSING?

- The Housing & Critical Needs Assessment is a tool to help you create goals in the program
- The Housing Stability Plan is where you record the goals the client and case manager work toward while receiving ESG assistance
- Client and case manager will sign the last page

8. Re-evaluations

8. _____ **Evidence of continued eligibility** of participant shows an evaluation at least once every three months while the participant is in the program. Agency may require re-evaluation when a relevant change to participant's income or circumstances has occurred. Time starts at program entry. Income may not exceed 30% AMI. 24 CFR 576.401(b)

Re-evaluation date	
Re-evaluation date	
Re-evaluation date	

- ☐ ESG Statement of Insufficient Resources **AND**
☐ ESG Income & Asset Calculation Worksheet with source documentation

Include the following **ONLY IF** source documents are unavailable:

- ☐ ESG Third-Party Verification of Income **AND**
☐ ESG Self-Certification of Income

9. _____ **ESG Financial Tracking Form** listing all payments made towards housing stability, supportive services or supplies to promote housing stability for the participant. 24 CFR 576.500(f)
Financial Tracking Form includes, date paid, check number, vendor/payee, eligible expense type, amount paid by ESG. Optional example can be found on the THDA website.

10. _____ Documentation of provision of **Termination Procedure** Include possible reasons for termination, the procedure for if/when a client is terminated from the program, and the appeal process. 24 CFR 576.500(f)(3) & 24 CFR 576.402

Was the client terminated from the program? ☐ Yes ☐ No

If yes, provide documentation related to the termination proceeding. Review 24 CFR 576.402

Were any Stabilization Services provided to the client? This excludes service delivery costs of the Homelessness Prevention program and is just to include Stabilization Costs specific to the participant. Examples would include admission to a credit repair class, budgeting class, hourly fees for legal services or mediation services. 24 CFR 576.105(b)

- ☐ Yes, with ESG ☐ Yes, without ESG ☐ No Stabilization Services were provided

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

1. _____ **Payment documentation of all Stabilization Services** provided with supporting documentation.
Costs recorded on Financial Tracking Sheet & includes invoices and proof of payments for all services provided to the participant. May include documentation that lawyers used are licensed and in good standing with the bar association, invoices from credit repair class, budgeting class, or mediation service.
2. _____ **Maximum Amounts & Periods of Assistance do not exceed 24 months in a 3-year period.**
Check HMIS or comparable database for other assistance. This can be documented by a case note from the case manager or self-certification from the participant. Financial Tracking Sheet will show that periods of assistance are not exceeded while in the program. 24 CFR 576.105(c) & 576.106(a)

- Homelessness Prevention requires re-evaluation of the client's needs for services at least once every three months.
- Agencies can choose to re-evaluate more frequently. Ensure your written standards outline frequency and you follow that consistently.
- **For client to continue receiving HP services, re-evaluations must meet the following and be recorded in the file:**
 - Income is at or below 30% AMI. Documentation requirements following the same criteria as #4 of this checklist. Include calculations of income as well as supporting documentation of income.
 - Declaration that client lacks sufficient resources to maintain their housing on their own.

9. Financial Assistance Tracking

8. _____ Evidence of continued eligibility of participant shows an evaluation at least once every three months while the participant is in the program. Agency may require re-evaluation when a relevant change to participant's income or circumstances has occurred. Time starts at program entry. Income may not exceed 30% AMI. 24 CFR 576.401(b)

Re-evaluation date	
Re-evaluation date	
Re-evaluation date	

- ☐ ESG Statement of Insufficient Resources AND
☐ ESG Income & Asset Calculation Worksheet with source documentation

Include the following **ONLY IF** source documents are unavailable:

- ☐ ESG Third-Party Verification of Income AND
☐ ESG Self-Certification of Income

9. _____ ESG Financial Tracking Form listing all payments made towards housing stability, supportive services or supplies to promote housing stability for the participant. 24 CFR 576.500(f)
Financial Tracking Form includes, date paid, check number, vendor/payee, eligible expense type, amount paid by ESG. Optional example can be found on the THDA website.

10. _____ Documentation of provision of Termination Procedure include possible reasons for termination, the procedure for if/when a client is terminated from the program, and the appeal process. 24 CFR 576.500(f)(3) & 24 CFR 576.402

Was the client terminated from the program? ☐ Yes ☐ No

If yes, provide documentation related to the termination proceeding. Review 24 CFR 576.402

Were any Stabilization Services provided to the client? This excludes service delivery costs of the Homelessness Prevention program and is just to include Stabilization Costs specific to the participant. Examples would include admission to a credit repair class, budgeting class, hourly fees for legal services or mediation services. 24 CFR 576.105(b)

- ☐ Yes, with ESG ☐ Yes, without ESG ☐ No Stabilization Services were provided

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

1. _____ Payment documentation of all Stabilization Services provided with supporting documentation.
Costs recorded on Financial Tracking Sheet & includes invoices and proof of payments for all services provided to the participant. May include documentation that lawyers used are licensed and in good standing with the bar association, invoices from credit repair class, budgeting class, or mediation service.
2. _____ Maximum Amounts & Periods of Assistance do not exceed 24 months in a 3-year period.
Check HMIS or comparable database for other assistance. This can be documented by a case note from the case manager or self-certification from the participant. Financial Tracking Sheet will show that periods of assistance are not exceeded while in the program. 24 CFR 576.105(c) & 576.106(a)

- All stabilizations services, financial assistance and rental assistance provided to the client on an individual basis should be tracked in the client's file
- Optional Form to use:
 - Financial Assistance Tracking Form can be found on our website and linked here.

9. ESG Financial Tracking Form

ESG Financial Tracking Form

HMIS/DV ID Number: _____ Client Name: _____

Program (circle one):

Street Outreach	Emergency Shelter	Rapid Re-housing	Homelessness Prevention
1. Outreach workers identify individuals in need of housing assistance through door-to-door visits, street encounters, and referrals from community partners. 2. Outreach workers provide information about available housing resources, including emergency shelters, rapid re-housing programs, and permanent supportive housing. 3. Outreach workers assist individuals in completing applications for housing assistance and provide support throughout the process. 4. Outreach workers provide ongoing support and advocacy to individuals, including assistance with job training, financial counseling, and mental health services.	1. Emergency shelters provide temporary housing for individuals experiencing homelessness, often offering meals, showers, and other basic necessities. 2. Emergency shelters provide a safe and secure environment for individuals, often offering case management and other support services. 3. Emergency shelters provide a transitional point for individuals, often offering referrals to other housing resources and support services. 4. Emergency shelters provide a supportive environment for individuals, often offering community activities and social support.	1. Rapid re-housing programs provide financial assistance to individuals to help them move quickly from homelessness to permanent housing. 2. Rapid re-housing programs provide case management and other support services to individuals, including assistance with job training, financial counseling, and mental health services. 3. Rapid re-housing programs provide a supportive environment for individuals, often offering community activities and social support. 4. Rapid re-housing programs provide a transitional point for individuals, often offering referrals to other housing resources and support services.	1. Homelessness prevention programs provide financial assistance to individuals to help them avoid homelessness, often offering rent assistance, eviction prevention, and other support services. 2. Homelessness prevention programs provide case management and other support services to individuals, including assistance with job training, financial counseling, and mental health services. 3. Homelessness prevention programs provide a supportive environment for individuals, often offering community activities and social support. 4. Homelessness prevention programs provide a transitional point for individuals, often offering referrals to other housing resources and support services.

This form is an optional tool to track financial services provided to household by the ESG program. We recommend this form be included in client files to ease internal and external monitoring practices. If a client enrolls in multiple programs offered under the ESG program, create a new Financial Tracking Form for each program enrollment. Costs to be tracked are only for individual service costs that can be tracked to each client. Program service costs do not need to be tracked per client.

All eligible costs can be found at [24 CFR Part 576](#).

[illegible]

Below are eligible costs of the ESG program separated by ESG component. It is the subrecipient's responsibility to understand the limitations of each eligible cost. Costs that do not comply with the limitations may be subject for re-payment to THDA and/or denied reimbursement. All limitations to costs can be found at [24 CFR Part 576](#). If you have a question if a cost is eligible, reach out to ESG@thda.org prior to purchasing and requesting reimbursement.

List of Street Outreach Eligible Expenses

Engagement Urgent physical needs (providing meals, blankets, clothes, toiletries, etc.)

Case Management Documentation gathering (obtaining IDs, birth certificates, etc.)

Emergency Health Outpatient health & mental health services

Transportation Public transportation to essential services, when public transportation is not available Lyft, Ubers and taxis are eligible costs

List of Emergency Shelter Eligible Expenses

Essential Services

Documentation gathering (obtaining IDs, birth certificates, etc.)

Child care

Education Services

Employment assistance & job training

Outpatient health services

Legal services

Outpatient mental health services

Outpatient substance abuse treatment services

Transportation (public transportation, when public transportation is not available Lyft, Ubers and taxis are eligible costs)

List of RRH and HP Eligible Expenses

Rental Assistance

Short-term rental assistance (1-3 months)	
--	--

Financial Assistance

	Rental Application Fees
--	-------------------------

Services Costs

	Housing Search & Placement
--	----------------------------

Medium-term rental assistance (4+ months)	10
---	----

Security Deposits (pet deposits not eligible)	
--	--

	Housing Stability Case Management
--	-----------------------------------

Rental Arrears

	Last month's rent
--	-------------------

	Mediation
--	-----------

--	--

Utility Deposits	
------------------	--

Legal Services

Page 10

Utility Payments	
------------------	--

Credit Repair

Page 10

Moving Costs

--	--

- Optional form
- Create clear method to see all ESG funds spent on assisting the client
- Reach out to our team if you are unsure about an eligible cost
- Supporting documentation of costs must also be included

9. ESG Financial Tracking Supporting Documentation

- Client files must include payment documentation and supporting documentation of all ESG costs contributing to a household:
 - Payment documentation includes **invoices and proof of payments** for all services, financial assistance and rental assistance provided to the participant. Minimum required would be a receipt. If a check was used, include the copy of the check.
 - Supporting documentation answers to discrepancies that may come up in a file review. May include: reasoning as to why application fee was over \$50, lease if the landlord did not provide an invoice for security deposit
 - This is the same information we require for draw requests. See our ESG Draw Request Documentation Standards.

10. Termination Procedure

8. _____ Evidence of continued eligibility of participant shows an evaluation at least once every three months while the participant is in the program. Agency may require re-evaluation when a relevant change to participant's income or circumstances has occurred. Time starts at program entry. Income may not exceed 30% AML. 24 CFR 576.401(b)

Re-evaluation date	
Re-evaluation date	
Re-evaluation date	

- ☐ ESG Statement of Insufficient Resources **AND**
☐ ESG Income & Asset Calculation Worksheet with source documentation

Include the following **ONLY IF** source documents are unavailable:

- ☐ ESG Third-Party Verification of Income **AND**
☐ ESG Self-Certification of Income

9. _____ ESG Financial Tracking Form listing all payments made towards housing stability, supportive services or supplies to promote housing stability for the participant. 24 CFR 576.500(f) Financial Tracking Form includes, date paid, check number, vendor/payee, eligible expense type, amount paid by ESG. Optional example can be found on the THDA website.

10. _____ Documentation of provision of Termination Procedure Include possible reasons for termination, the procedure for if/when a client is terminated from the program, and the appeal process. 24 CFR 576.500(f)(3) & 24 CFR 576.402

Was the client terminated from the program? ☐ Yes ☐ No

If yes, provide documentation related to the termination proceeding. Review 24 CFR 576.402

Were any Stabilization Services provided to the client? This excludes service delivery costs of the Homelessness Prevention program and is just to include Stabilization Costs specific to the participant. Examples would include admission to a credit repair class, budgeting class, hourly fees for legal services or mediation services. 24 CFR 576.105(b)

- ☐ Yes, with ESG ☐ Yes, without ESG ☐ No Stabilization Services were provided

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

1. _____ Payment documentation of all Stabilization Services provided with supporting documentation. Costs recorded on Financial Tracking Sheet & includes invoices and proof of payments for all services provided to the participant. May include documentation that lawyers used are licensed and in good standing with the bar association, invoices from credit repair class, budgeting class, or mediation service.
2. _____ Maximum Amounts & Periods of Assistance do not exceed 24 months in a 3-year period. Check HMIS or comparable database for other assistance. This can be documented by a case note from the case manager or self-certification from the participant. Financial Tracking Sheet will show that periods of assistance are not exceeded while in the program. 24 CFR 576.105(c) & 576.106(a)

- If a program participant violates program requirements, the agency may terminate the assistance in accordance with a formal process established by the agency that recognizes the rights of individuals affected. The agency must exercise judgment and 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.
- ***Make sure your Policies and Procedures have this Termination Procedure, at minimum:***
 1. Written notice to the program participant containing a clear statement of the reasons for termination;
 2. 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 of that person) who made or approved the termination decision; and
 3. Prompt written notice of the final decision to the program participant.
- Copy of the written notice can go into the client's file to satisfy this requirement or case note that it was given to the client

Were Stabilization Services provided to the client?

8. _____ Evidence of continued eligibility of participant shows an evaluation at least once every three months while the participant is in the program. Agency may require re-evaluation when a relevant change to participant's income or circumstances has occurred. Time starts at program entry. Income may not exceed 30% AML. 24 CFR 576.401(b)

Re-evaluation date	
Re-evaluation date	
Re-evaluation date	

- ☐ ESG Statement of Insufficient Resources AND
☐ ESG Income & Asset Calculation Worksheet with source documentation

Include the following **ONLY IF** source documents are unavailable:

- ☐ ESG Third-Party Verification of Income AND
☐ ESG Self-Certification of Income

9. _____ ESG Financial Tracking Form listing all payments made towards housing stability, supportive services or supplies to promote housing stability for the participant. 24 CFR 576.500(f) Financial Tracking Form includes, date paid, check number, vendor/payee, eligible expense type, amount paid by ESG. Optional example can be found on the THDA website.

10. _____ Documentation of provision of Termination Procedure Include possible reasons for termination, the procedure for if/when a client is terminated from the program, and the appeal process. 24 CFR 576.500(f)(3) & 24 CFR 576.402

Was the client terminated from the program? ☐ Yes ☐ No

If yes, provide documentation related to the termination proceeding. Review 24 CFR 576.402

Were any Stabilization Services provided to the client? This excludes service delivery costs of the Homelessness Prevention program and is just to include Stabilization Costs specific to the participant. Examples would include admission to a credit repair class, budgeting class, hourly fees for legal services or mediation services. 24 CFR 576.105(b)

- ☐ Yes, with ESG ☐ Yes, without ESG ☐ No Stabilization Services were provided

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

1. _____ Payment documentation of all Stabilization Services provided with supporting documentation. Costs recorded on Financial Tracking Sheet & includes invoices and proof of payments for all services provided to the participant. May include documentation that lawyers used are licensed and in good standing with the bar association, invoices from credit repair class, budgeting class, or mediation service.
2. _____ Maximum Amounts & Periods of Assistance do not exceed 24 months in a 3-year period. Check HMIS or comparable database for other assistance. This can be documented by a case note from the case manager or self-certification from the participant. Financial Tracking Sheet will show that periods of assistance are not exceeded while in the program. 24 CFR 576.105(c) & 576.106(a)

- Only complete this part of the checklist if Stabilization Services were provided.
- This includes: Housing search and placement, Housing stability case management, Mediation, Legal services and Credit repair
- If yes, the following needs to be included in the client's file:
 - Case notes tracking services client received
 - Payment tracking of stabilization services following rules of #9 of this checklist
 - Certification from a case manager that client has not received over 24 months of stabilization services in a 3-year period (this can be a case note after due-diligence is completed or self-certification from client)

Was Financial Assistance provided to the client?

- Only complete this part of the checklist if Financial Assistance was provided.
- This includes: Rental application fees, Security deposit, Last month's rent, Utility deposits/payments and Moving costs
- If yes, the following needs to be included in the client's file:
 - Minimum Habitability Standards Checklist with every standard approved for all units the client plans to stay in using ESG funds
 - Lead-Based Paint Visual Assessment Form filled out for all units the client plans to stay in using ESG funds
 - Certification from a case manager that client has not received over 24 months of financial assistance in a 3-year period (this can be a case note after due-diligence is completed or self-certification from client)
 - Certification from a case manager that client is not using any other subsidies (can also be a case note)
 - Payment tracking of financial assistance following rules of #9 of this checklist

Was any **Financial Assistance** provided to the participant? *Financial Assistance includes – Rental Application Fees, Security Deposits, Utility Deposits, Utility Payments, Moving Costs and Last Month's Rent. 24 CFR 576.105(a)*

☐ Yes, with ESG ☐ Yes, without ESG ☐ No Financial Assistance was provided

If ESG was used to provide Financial Assistance the following requirements apply:

1. _____ **Minimum Habitability Standards** checklist 24 CFR 576.403(c)
2. _____ **Lead Paint Disclosure Form**, including provision of Lead Safety Pamphlet 24 CFR 576.403(a)
 - ☐ N/A: unit built after 1978
 - ☐ N/A: no child under 6 or pregnant woman was/will be in residence
3. _____ **Maximum Amounts & Periods of Assistance do not exceed 24 months in a 3-year period.** 24 CFR 576.105(c) & 24 CFR 576.106(a)
4. _____ **Participant is not using any other subsidies** or another ESG program for assistance with housing – record case manager's due diligence in checking this provision in case note 24 CFR 576.106(c)
5. _____ **Payment documentation of Financial Assistance with supporting documentation.**
Supporting documentation may include lease agreements, utility bills, invoices for moving expenses, or invoices for rental application fees. Include proof of payment documentation (check stubs, payment confirmation, etc.) that contains payment dates, payment amounts, and types of expenses.

Was any **Rental Assistance** provided to the client? *This includes short-term & medium-term rental assistance and rental arrears.*

☐ Yes, with ESG ☐ Yes, without ESG funds ☐ No rental assistance was provided

If ESG was used to provide Rental Assistance, the following requirements apply 24 CFR 576.500(h):

1. _____ A copy of the **lease agreement** covering the dates of rental assistance provided 24 CFR 576.106(g)
2. _____ **VAWA lease addendum** (HUD form 91067). 24 CFR 576.500(h)
 - A separate form is not required if the information is provided in the original lease agreement
3. _____ Documentation of provision of **VAWA Protections**. Forms can be found on www.hud.gov/vawa (24 CFR 576.409(c))
 - **Notice of Occupancy Rights (HUD form 5380)** must be provided when rental assistance begins AND when client is notified of termination of rental assistance and/or notified of eviction
 - **Certification form to document an incident (HUD form 5382)** must be provided when client is notified of termination of rental assistance and/or notified of eviction
4. _____ Documentation of unit compliance with **Rent Reasonableness** 24 CFR 576.106(d)(1)
5. _____ Documentation of unit compliance with **Fair Market Rent** 24 CFR 576.106(d)(1)
 - ☐ N/A: used HUD-approved FMR waiver for the area _____
6. _____ **Minimum Habitability Standards** checklist 24 CFR 576.403 (c)

Was Rental Assistance provided to the client?

Was any Rental Assistance provided to the client? *This includes short-term & medium-term rental assistance and rental arrears.*

☐ Yes, with ESG ☐ Yes, without ESG funds ☐ No rental assistance was provided

If ESG was used to provide Rental Assistance, the following requirements apply 24 CFR 576.500(h):

- _____ A copy of the **lease agreement** covering the dates of rental assistance provided 24 CFR 576.106(g)
- _____ **VAWA lease addendum** (HUD form 91067). 24 CFR 576.500(h)
 - A separate form is not required if the information is provided in the original lease agreement
- _____ Documentation of provision of **VAWA Protections**. Forms can be found on www.hud.gov/vawa (24 CFR 576.409(c))
 - **Notice of Occupancy Rights (HUD form 5380)** must be provided when rental assistance begins AND when client is notified of termination of rental assistance and/or notified of eviction
 - **Certification form to document an incident (HUD form 5382)** must be provided when client is notified of termination of rental assistance and/or notified of eviction
- _____ Documentation of unit compliance with **Rent Reasonableness** 24 CFR 576.106(d)(1)
- _____ Documentation of unit compliance with **Fair Market Rent** 24 CFR 576.106(d)(1)
 - ☐ N/A: used HUD-approved FMR waiver for the area _____
- _____ Minimum **Habitability Standards** checklist 24 CFR 576.403 (c)

ESG Client File Checklist – Homelessness Prevention Page 3 of 6

- _____ **Lead Paint Disclosure Form**, including provision of Lead Safety Pamphlet (24 CFR 576.403(a))
 - ☐ N/A: unit built after 1978
 - ☐ N/A: no child under 6 or pregnant woman was/will be in residence
- _____ **Rental Assistance Agreement** between agency and landlord outlining the terms of the assistance 24 CFR 576.106(e), 24 CFR 576.500(h), 24 CFR 576.409(a)
- _____ **Participant is not using any other subsidies** or another ESG program for assistance with housing – record case manager's due diligence in checking this provision in case note 24 CFR 576.106(c)
 - ☐ N/A: In the case where Rental Assistance is solely for Rental Arrears on a unit where the participant is receiving another subsidy for rent
- _____ **Documentation of rental assistance payments, along with supporting documentation** Include payment documentation (e.g. fiscal ledger, check stubs, etc.) that contains payment dates, payment amounts, types of expenses, and dates of occupancy. Supporting documentation may be leases or invoices from the landlord. 24 CFR 576.500(h)
- _____ **Maximum Amounts & Periods of Assistance do not exceed 24 months in a 3-year period.** (24 CFR 576.105(c) & 576.106(a))

- Only complete this part of the checklist if Rental Assistance was provided.
- This includes: Short- and Medium-Term Rental Assistance and Rental Arrears
- If yes, the following needs to be included in the client's file:
 - Copy of the fully executed lease, all pages
 - Copy of the fully executed VAWA Lease Addendum, if not already in the lease
 - Documentation that the client was given HUD Form 5380 and HUD Form 5382
 - Documentation that unit complies with Rent Reasonableness and FMR
 - Documentation that the unit complies with Habitability Standards
 - Lead-Based Paint Visual Assessment Form is completed. Optional form. If you don't use this form, document in the file whether a LBP Visual Assessment is necessary or not.
 - Fully executed Rental Assistance Agreement between agency and landlord
 - Documentation from case manager that due diligence was completed to show client is not receiving any other rental subsidies
 - Payment tracking of financial assistance following rules of #9 of this checklist
 - Certification from a case manager that client has not received over 24 months of rental assistance in a 3-year period (this can be a case note after due-diligence is completed or self-certification from client)

Lease

- Must be in the client file if Rental Assistance was provided
- Copy of the legally binding, written lease for the rental unit. The exception is unless the assistance is solely for rental arrears and no other rental assistance will be provided then no lease is needed.
- The lease must be between the owner/landlord and the program participant for valid dates that services are being provided.
- If lease term has ended, additional documentation that lease is month-to-month is required.
- If rent amount in lease does not match what is being paid, documentation from the landlord of the raised rent is required.
- VAWA Lease Addendum must also be executed between all landlords and tenants if rental assistance is being provided so their rights under VAWA can be activated if necessary (more details will be covered in subsequent slides)

VAWA Protections

- The Violence Against Women Act (“VAWA”) protects applicants, tenants, and program participants in certain HUD programs from being evicted, denied housing assistance, or terminated from housing assistance based on acts of domestic violence, dating violence, sexual assault, or stalking against them.
- VAWA Protections are available for **all clients**, regardless of sex, gender identity, sexual orientation, race, color, national origin, familial status, disability or age.
- Copies of the following must be given to all clients when they receive rental assistance. All can be found on THDA’s website:
 - HUD Form 5380 “Notice of Occupancy Rights under the Violence Against Women Act” (also required at ESG program entry, as part of #2 of the checklist)
 - HUD Form 5382 “Certification of Domestic Violence, Dating Violence, Sexual Assault or Stalking & Alternate Documentation”
- The purpose of these forms is to inform and protect all participants housed in HUD-assisted housing of their rights under VAWA.
- Client’s file must somehow show that these forms were given to the client

HUD Form 5380 “Notice of Occupancy Rights”

NOTICE OF OCCUPANCY RIGHTS UNDER THE
VIOLENCE AGAINST WOMEN ACT
HUD-5380: Housing Rights for Victims

U.S. Department of Housing and Urban Development
OMB Approval No. 2577-0286
Expires 1/31/2028

Protections for Victims of Domestic Violence, Dating Violence, Sexual Assault or Stalking

When should I receive this form? A covered housing provider must provide a copy of the Notice of Occupancy Rights Under The Violence Against Women Act (Form HUD-5380) and the Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking (Form HUD-5382) when you are admitted as a tenant, when you receive an eviction or termination notice and prior to termination of tenancy, or when you are denied as an applicant. A covered housing provider may provide these forms at additional times.

What is the Violence Against Women Act (“VAWA”)? This notice describes protections that may apply to you as an applicant or a tenant under a housing program covered by a federal law called the Violence Against Women Act (“VAWA”). VAWA provides housing protections for victims of domestic violence, dating violence, sexual assault or stalking. VAWA protections must be in leases and other program documents, as applicable. VAWA protections may be raised at any time. You do not need to know the type or name of the program you are participating in or applying to in order to seek VAWA protections.

What if I require this information in a language other than English? To read this information in Spanish or another language, please contact _____ or go to _____

You can read translated VAWA forms at https://www.hud.gov/program_offices/administration/hudclips/forms/hud5a#4. If you speak or read in a language other than English, your covered housing provider must give you language assistance regarding your VAWA protections (for example, oral interpretation and/or written translation).

What do the words in this notice mean?

- *VAWA violence/abuse* means one or more incidents of domestic violence, dating violence, sexual assault, or stalking.
- *Victim* means any victim of *VAWA violence/abuse*.
- *Affiliated person* means the tenant’s spouse, parent, sibling, or child; or any individual, tenant, or lawful occupant living in the tenant’s household; or anyone for whom the tenant acts as parent/guardian.
- *Covered housing program*¹ includes the following HUD programs:
 - Public Housing
 - Tenant-based vouchers (TBV, also known as Housing Choice Vouchers or HCV) and Project-based Vouchers (PBV) Section 8 programs
 - Section 8 Project-Based Rental Assistance (PBRA)
 - Section 8 Moderate Rehabilitation Single Room Occupancy
 - Section 202 Supportive Housing for the Elderly
 - Section 811 Supportive Housing for Persons with Disabilities
 - Section 221(d)(3)/(d)(5) Multifamily Rental Housing
 - Section 236 Multifamily Rental Housing
 - Housing Opportunities for Persons With AIDS (HOPWA) program
 - HOME Investment Partnerships (HOME) program
 - The Housing Trust Fund
 - Emergency Solutions Grants (ESG) program
 - Continuum of Care program
 - Rural Housing Stability Assistance program
- *Covered housing provider* means the individual or entity under a covered housing program that is responsible for providing or overseeing the VAWA protection in a specific situation. The covered housing provider may be a public housing agency, project sponsor, housing owner, mortgagee, housing manager, State or local government, public agency, or a nonprofit or for-profit organization as the lessor.

¹ For information about non-HUD covered housing programs under VAWA, see Interagency Statement on the Violence Against Women Act’s Housing Provisions at <https://www.hud.gov/sites/dfiles/PA/documents/InteragencyVAWAHousingStmnt092024.pdf>.
Page 1 of 5 Form HUD-5380

- This form explains that victims of domestic violence, dating violence, sexual assault, or stalking cannot be denied housing or evicted solely because of being a victim if they are a part of a HUD-assisted housing program.
- Outlines available options, such as emergency transfers and protection from lease termination and gives information about other related forms (like HUD-5382) and how to request protections
- This is an information and notice document, ensuring people know their rights under VAWA—not a form they fill out, but one housing providers must give to tenants

HUD Form 5380 “Notice of Occupancy Rights”

NOTICE OF OCCUPANCY RIGHTS UNDER THE
VIOLENCE AGAINST WOMEN ACT
HUD-5380: Housing Rights for Victims

U.S. Department of Housing and Urban Development
OMB Approval No. 2577-0286
Expires 1/31/2028

Protections for Victims of Domestic Violence, Dating Violence, Sexual Assault or Stalking

When should I receive this form? A covered housing provider must provide a copy of the Notice of Occupancy Rights Under The Violence Against Women Act (Form HUD-5380) and the Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking (Form HUD-5382) when you are admitted as a tenant, when you receive an eviction or termination notice and prior to termination of tenancy, or when you are denied as an applicant. A covered housing provider may provide these forms at additional times.

What is the Violence Against Women Act (“VAWA”)? This notice describes protections that may apply to you as an applicant or a tenant under a housing program covered by a federal law called the Violence Against Women Act (“VAWA”). VAWA provides housing protections for victims of domestic violence, dating violence, sexual assault or stalking. VAWA protections must be in leases and other program documents, as applicable. VAWA protections may be raised at any time. You do not need to know the type or name of the program you are participating in or applying to in order to seek VAWA protections.

What if I require this information in a language other than English? To read this information in Spanish or another language, please contact _____ or go to _____

You can read translated VAWA forms at https://www.hud.gov/program_offices/administration/hudclips/forms/hud5a#4. If you speak or read in a language other than English, your covered housing provider must give you language assistance regarding your VAWA protections (for example, oral interpretation and/or written translation).

What do the words in this notice mean?

- ° *VAWA violence/abuse* means one or more incidents of domestic violence, dating violence, sexual assault, or stalking.
- ° *Victim* means any victim of *VAWA violence/abuse*.
- ° *Affiliated person* means the tenant’s spouse, parent, sibling, or child; or any individual, tenant, or lawful occupant living in the tenant’s household; or anyone for whom the tenant acts as parent/guardian.
- ° *Covered housing program*¹ includes the following HUD programs:
 - Public Housing
 - Tenant-based vouchers (TBV, also known as Housing Choice Vouchers or HCV) and Project-based Vouchers (PBV) Section 8 programs
 - Section 8 Project-Based Rental Assistance (PBRA)
 - Section 8 Moderate Rehabilitation Single Room Occupancy
 - Section 202 Supportive Housing for the Elderly
 - Section 811 Supportive Housing for Persons with Disabilities
 - Section 221(d)(3)/(d)(5) Multifamily Rental Housing
 - Section 236 Multifamily Rental Housing
 - Housing Opportunities for Persons With AIDS (HOPWA) program
 - HOME Investment Partnerships (HOME) program
 - The Housing Trust Fund
 - Emergency Solutions Grants (ESG) program
 - Continuum of Care program
 - Rural Housing Stability Assistance program
- ° *Covered housing provider* means the individual or entity under a covered housing program that is responsible for providing or overseeing the VAWA protection in a specific situation. The covered housing provider may be a public housing agency, project sponsor, housing owner, mortgagor, housing manager, State or local government, public agency, or a nonprofit or for-profit organization as the lessor.

¹ For information about non-HUD covered housing programs under VAWA, see Interagency Statement on the Violence Against Women Act’s Housing Provisions at <https://www.hud.gov/sites/dfiles/PA/documents/InteragencyVAWAHousingStmnt092024.pdf>.
Page 1 of 5 Form HUD-5380

- This must be given to the program participant at the following times:
 1. Entry into the Homelessness Prevention program
 2. AND when rental assistance is provided to client.
- Every agency needs to edit this form for their own agency PRIOR to giving to clients.
- Client files must show this was given to the participant

HUD Form 5382 “Certification of DV, Dating Violence, Sexual Assault, or Stalking and Alternate Documentation”

NOTICE OF OCCUPANCY RIGHTS UNDER THE
VIOLENCE AGAINST WOMEN ACT
HUD-5380: Housing Rights for Victims

U.S. Department of Housing and Urban Development
OMB Approval No. 2577-0286
Expires 1/31/2028

Protections for Victims of Domestic Violence, Dating Violence, Sexual Assault or Stalking

When should I receive this form? A covered housing provider must provide a copy of the Notice of Occupancy Rights Under The Violence Against Women Act (Form HUD-5380) and the Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking (Form HUD-5382) when you are admitted as a tenant, when you receive an eviction or termination notice and prior to termination of tenancy, or when you are denied as an applicant. A covered housing provider may provide these forms at additional times.

What is the Violence Against Women Act (“VAWA”)? This notice describes protections that may apply to you as an applicant or a tenant under a housing program covered by a federal law called the Violence Against Women Act (“VAWA”). VAWA provides housing protections for victims of domestic violence, dating violence, sexual assault or stalking. VAWA protections must be in leases and other program documents, as applicable. VAWA protections may be raised at any time. You do not need to know the type or name of the program you are participating in or applying to in order to seek VAWA protections.

What if I require this information in a language other than English? To read this information in Spanish or another language, please contact _____ or go to _____

You can read translated VAWA forms at https://www.hud.gov/program_offices/administration/hudclips/forms/hud5a#4. If you speak or read in a language other than English, your covered housing provider must give you language assistance regarding your VAWA protections (for example, oral interpretation and/or written translation).

What do the words in this notice mean?

- *VAWA violence/abuse* means one or more incidents of domestic violence, dating violence, sexual assault, or stalking.
- *Victim* means any victim of *VAWA violence/abuse*.
- *Affiliated person* means the tenant’s spouse, parent, sibling, or child; or any individual, tenant, or lawful occupant living in the tenant’s household; or anyone for whom the tenant acts as parent/guardian.
- *Covered housing program*¹ includes the following HUD programs:
 - Public Housing
 - Tenant-based vouchers (TBV, also known as Housing Choice Vouchers or HCV) and Project-based Vouchers (PBV) Section 8 programs
 - Section 8 Project-Based Rental Assistance (PBRA)
 - Section 8 Moderate Rehabilitation Single Room Occupancy
 - Section 202 Supportive Housing for the Elderly
 - Section 811 Supportive Housing for Persons with Disabilities
 - Section 221(d)(3)/(d)(5) Multifamily Rental Housing
 - Section 236 Multifamily Rental Housing
 - Housing Opportunities for Persons With AIDS (HOPWA) program
 - HOME Investment Partnerships (HOME) program
 - The Housing Trust Fund
 - Emergency Solutions Grants (ESG) program
 - Continuum of Care program
 - Rural Housing Stability Assistance program
- *Covered housing provider* means the individual or entity under a covered housing program that is responsible for providing or overseeing the VAWA protection in a specific situation. The covered housing provider may be a public housing agency, project sponsor, housing owner, mortgagor, housing manager, State or local government, public agency, or a nonprofit or for-profit organization as the lessor.

¹ For information about non-HUD covered housing programs under VAWA, see Interagency Statement on the Violence Against Women Act’s Housing Provisions at <https://www.hud.gov/sites/dfiles/PA/documents/InteragencyVAWAHousingStmnt092024.pdf>.
Page 1 of 5 Form HUD-5380

- Example - A tenant in a HUD-assisted apartment gets into repeated disturbances because their abusive partner comes to the property, causing noise complaints and police calls. The landlord starts the eviction process, citing lease violations.
- How HUD Form 5382 is used - The tenant completes VAWA Form 5382 to certify that
 - The lease violations are directly related to domestic violence, and
 - They are a victim seeking protection under VAWA
 - They submit the form to the housing provider within the required timeframe.
- Outcome - The housing provider must consider the VAWA protections, which may:
 - Stop or prevent the eviction of the victim
 - Allow the landlord to remove the abuser instead (if applicable) or
 - Help the tenant remain safely housed

VAWA Lease Addendum

- A VAWA lease addendum must be included if rental assistance is provided because it formally builds VAWA protections into the rental agreement, ensuring both the tenant and landlord understand and follow those protections.
- If VAWA lease addendum is already in lease, an additional one does not need to be executed.
- If landlord refuses to sign, rental assistance may not be provided to that unit
- The VAWA lease addendum is essential in ESG rental assistance because it turns federal survivor protections into enforceable lease conditions, helping keep vulnerable households safely housed.
- Copy of the VAWA Lease Addendum must be kept in the client file.
- Sample VAWA Lease Addendum is on our website

Emergency Transfer Plan

- Each CoC will have their own Emergency Transfer Plan (ETP)
- Please ensure you are familiar with the ETP your CoC has established.

Rent Reasonableness

- Client's file must show that the unit receiving rental assistance must comply with HUD's standard of rent reasonableness.
- This rent restriction is intended to make sure that program participants can remain in their housing after their ESG assistance ends.
- Rent Reasonableness Form linked [here](#) must be completed and included in the client's file.
- If the rent is not reasonable, then rental assistance may not be provided.

Rent Reasonableness

RENT REASONABLENESS CHECKLIST AND CERTIFICATION				
	Proposed Unit	Unit #1	Unit #2	Unit #3
Address				
Number of Bedrooms				
Square Feet				
Type of Unit/Construction				
Housing Condition				
Location/Accessibility				
Amenities				
Unit:				
Site:				
Neighborhood:				
Age in Years				
Utilities (type)				
Unit Rent				
Utility Allowance				
Gross Rent				
Handicap Accessible?				

CERTIFICATION:

A. Compliance with Rent Reasonableness Payment Standard:

Proposed Contract Rent + Utility Allowance = Proposed Gross Rent

Approved rent does not exceed applicable RR Payment Standard of \$ _____
(Average Gross Rent of Units 1, 2 & 3)

B. Rent Reasonableness

Based upon a comparison with rents for comparable units, I have determined that the proposed rent for the unit [] is [] is not reasonable.

Name:	Signature:	Date:
-------	------------	-------

1. Fill out information for the Proposed Unit – this is the unit where the participant is receiving rental assistance
2. Find three comparable units – you can use Zillow, apartments.com, ads, etc. or in person with “For Rent” signs in your area or with property management companies.
3. Include the Utility allowances as necessary. They are separated by county and linked on our website. All utilities included in lease price should not be included in Utility Allowance.
4. A. Proposed Unit Rent + Utility Allowance Of Proposed Unit = Gross Rent
5. B. Is calculating the average of Unit 1, 2 and 3.
6. If the total Proposed Gross Rent in A does not exceed the average gross rent of the other three comparable units in B then the rent is considered reasonable
7. Mark whether the unit is reasonable or not
8. Case manager signs and certifies the Rent Reasonable Form and includes in client’s file

Fair Market Rent

- Client's file must show that unit does not exceed the fair market rent for the area unit is located as established by HUD
- This rent restriction is intended to make sure that program participants can remain in their housing after their ESG assistance ends.
 1. [Go to Fair Market Rents from HUD linked here.](#)
 2. Select appropriate Fiscal Year. Years resets on Oct 1.
 3. Select State and County the prospective unit is located.
 4. Include in client's file a clear declaration that unit meets FMR.
 - This could be a screen shot of the Fair Market Rent page, a case note or some agencies include it on their Rent Reasonableness form.
 - Clarify how many bedrooms the unit is on documentation or in case note.

Minimum Habitability Standards

- If any rental or financial assistance is provided, the client's file must show that unit was inspected by case manager prior to providing assistance.
- ESG funds may not be used for a unit until compliance with these standards are met.
- Grantees are responsible for maintaining documentation of compliance with these standards for each unit assisted with ESG funds.
- Habitability standard inspections must be made by the grantee or by a contracted third-party of the grantee.
- Program participants MAY NOT conduct an inspection of a unit that they will occupy.
- Not needed for payments of arrears where the client is no longer residing in the unit
- Habitability Standards are set to change to NSPIRE on Oct 1, 2026. We do not have direction from HUD at this time on how that applies to the ESG program.

Minimum Habitability Standards Checklist

- [ESG Minimum Habitability Standards for Permanent Housing is linked here](#) & must be completed and included in client's file. Permanent Housing Checklist begins on page 4 of the document.
 1. Carefully read each statement and indicate the unit's status for each requirement (Approved or Deficient).
 2. Add any comments and corrective actions needed in the appropriate box.
 3. The reviewer should complete the information about the project, and sign and date the form. This template includes space for an "approving official," if the grantee has designated another authority to approve the review.
 4. When the assessment is complete, review it with program staff and develop an action plan for addressing any areas requiring corrective action.
 5. Keep this form in the client's file

Lead-Based Paint Visual Assessment Declaration

- Client files must show for all units receiving Rental Assistance and Financial Assistance acknowledgement of Lead-Based Paint rules
- You can do this with the “Lead Based Paint Visual Assessment” form found on THDA’s ESG Forms page.
- The form will either trigger a physical inspection OR confirm the unit does not need to be inspected for lead-based paint.
- Any employees that will be completing the LBP Visual Assessment Form need to complete LBP Visual Assessment Training linked here first. Documentation of completed training should be kept in your agency’s records.
- Not needed for payments of arrears where the client is no longer residing in the unit

Lead-Based Paint Visual Assessment Form

ESG Lead-Based Paint Visual Assessment

All units in which ESG program participants reside are subject to LBP requirements. Individuals completing this form must complete the online HUD training:

<http://www.hud.gov/offices/lead/training/visualassessment/h00101.htm>

Program Participant Name: _____

Property Address: _____

Property Owner Name: _____

Check all that apply:

- ☐ Property was built after 1978
If built after 1978 - Year Built: _____
- ☐ No child under 6 lives with program participant
- ☐ Property is zero bedrooms, SRO housing, elderly housing
- ☐ Property has been tested and determined to not contain LBP (attach documentation)
- ☐ Property has had LBP hazards removed (attach documentation)

If any items are checked above, no Visual Assessment is required. Please include signatures of participant and agency, and date. If no items are checked above, Visual Assessment is required.

- ☐ Interior: Is there any peeling, chipping, chalking or cracking paint?
- ☐ Interior: Deterioration exceeds the de minimis level?
- ☐ Exterior: Is there any peeling, chipping, chalking or cracking paint?
- ☐ Exterior: Deterioration exceeds the de minimis level?
- ☐ Common Areas: Is there any peeling, chipping, chalking or cracking paint?
- ☐ Common Areas: Deterioration exceeds the de minimis level?

Describe any action taken:

Program Participant: _____ Date: _____

Program Staff Person: _____ Date: _____



1. Complete all top information
2. Check all boxes that apply
 - If any boxes in the first section are checked, a physical lead-based paint visual assessment is not needed.
 - If boxes in the first section are not checked, complete physical visual assessment for the unit as required and describe any action taken to remediate any LBP problems.
3. Proceed with a physical lead-based paint inspection. If the unit fails and the landlord will not provide the appropriate step for remediation, then ESG financial and/or rental assistance cannot be provided for the unit.
4. Program participant and staff sign and dates form. Include in client's chart.

Rental Assistance Agreement

- Must be between the owner/landlord of unit and agency
- The rental assistance payments must only be made to the owner who has signed the rental assistance agreement
- The rental assistance agreement must set forth the terms under which rental assistance will be provided. Must include at minimum:
 - Amount and duration of assistance
 - The same payment due date, grace period, and late payment penalty requirements as the program participant's lease.
 - “The owner must give the agency 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.”
 - “If the program participant moves out of the housing unit for which the program participant has a lease, the lease terminates and is not renewed, or the program participant becomes ineligible to receive ESG rental assistance the Rental Assistance Agreement is null and payments to landlord must stop.”
- Late fees incurred after the date the rental assistance agreement is signed are not eligible. Agency is responsible to make timely payments to each owner in accordance with the rental assistance agreement. The agency is solely responsible for paying late payment penalties that it incurs with non-ESG funds.

Staff Checks for duplication of services and/or federal subsidies

- Client file must show due diligence that ESG staff checked HMIS (or HMIS COMPARABLE DATABASE) to determine if the applicant is currently receiving the same type of assistance from any other federal source.
- Clients cannot receive funding for duplicate services at the same time.
- Client file must also show due diligence that the client is receiving no other federal subsidies.
Check the client's lease to ensure that they do not have other Federal subsidies and/or vouchers
 - If they do, you may only pay financial assistance or arrears (if arrears were incurred prior to entry of program) but not short-term & medium-term rental assistance.
- Documentation may include one or all of the following:
 - A HMIS screenshot showing no other services being utilized
 - Case manager may also complete a case note which states there is no other services
 - Self-certification from the client that they are not receiving other services

Case Notes

- Commonly missing in client files
- If you did not document it, IT DIDN'T HAPPEN
- Recommend finding a template to record client meetings and progression
- Common case note templates are SOAP, DAP, BIRP & GIRP – find what works best for your agency
- Most important to be clear, factual and goal-oriented
- Multiple requirements can be met through case notes. Some include:
 - Services, assistance and referrals provided
 - Housing Stability Case Management
 - Monthly case management meetings (if client could not attend a case management meeting, there should be documentation of that as well)
 - Circumstances surrounding termination and/or exit from the ESG program. If the client is terminated, the case note must confirm that all requirements of due process were met.

Five-Year Record Retention

- All program participant records must be retained for 5 years after the expenditure of all funds from the grant under which the program participant was served
- This includes records of clients who were deemed ineligible for the ESG program detailing why they were ineligible
- If you think you may have issues with complying with this record retention regulation, please contact THDA for remediation

Homelessness Prevention File Review

- If you would like a complimentary HP file review by our ESG team, please email ESG@thda.org
- Files will be uploaded via EDT. If you do not have an EDT account, we will work with you to set one up. Do not send client files via email.
- We will accept a sample file or real client file.
 - If it's a sample file, we request that placeholders for the documentation is shown in the example so we know it's not being omitted
 - If it's a client's file, we request that you choose a client who received rental assistance so we can make sure that every requirement was properly collected or we will accept placeholders for certain documentation that isn't collected yet

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

HUD Exchange

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

THDA's ESG Program Guide

- <https://thda.org/pdf/1.-ESG-Guide.pdf>

ESG Program Forms

- <https://thda.org/government-nonprofit-partners/emergency-solution-grants-esg-program/esg-program-forms>

HUD's VAWA Website

- <https://www.hud.gov/VAWA>

Key Changes in VAWA 2022 Notice that are relevant to ESG

- [https://www.hud.gov/sites/dfiles/Main/documents/VAWA Letter CoC ESG Grantees.pdf](https://www.hud.gov/sites/dfiles/Main/documents/VAWA_Letter_CoC_ESG_Grantees.pdf)