

ESG/CV Notice Webinar

0:00:00.2 Lisa: And allocating these ESG-CV resources. So first of all, the CARES Act resources are designed to prevent the spread of COVID and to reduce the harm caused by COVID. We all know that the safest place for people to be during this epidemic is in housing, COVID-19 has definitely amplified the historic and the current racial biases and discrimination that are embedded in our system, which includes the homeless system, in our processes and our practices. So the people who are most impacted by COVID, the most harmed by COVID, the most harmed by housing instability and homelessness included of course, racial minorities, especially black and indigenous people, those who are elderly, those who have health problems, especially respiratory problem. Next slide, please. Or am I, Am I being... Okay, great. So, we all know that COVID has had an economic impact on our communities, including job loss, housing instabilities and increased risk of homelessness, and those economic effects are also most likely to impact racial minorities, especially black and indigenous people. So, what does that mean for us all, what does that mean for to you all on this call. We just wanted to affirm that HUD is committed to working with our CoC and the ESG grantees and communities to support you all in advancing your efforts to be more equitable and to close racial disparities, many of you are doing incredible work in this issue.

0:01:37.5 Lisa: We're learning a lot through the pandemic. So we definitely wanna continue to support you all in your effort and in your ability to bring in people who have lived experience with homelessness, people who are racial minorities in your communities, to have these conversations about how to allocate these resources and ensure that we're not exacerbating racial disparities in the system. So, wanted to remind you all that we have a great deal of resources available for you around racial equity, you can find material on HUD exchange, there is a racial equity and homelessness landing page, so definitely wanna direct you to resources there, and I am available to answer any questions and we'll be here throughout the webinar, so thank you all for your time, and I believe I'm passing this mic over to Brett.

0:02:34.1 Brett: Great, thank you, Lisa. And thank you everyone for joining us today. This notice has been a long time coming and we appreciate your patience. So today what we're hoping to do is give you a highlight of the major changes that are in the revised ESG-CV notice, including important updates for emergency shelter and temporary emergency shelter, new eligible activities that will hopefully help you to meet some of those expenditure deadlines and some of the additional waivers and flexibilities that are available to you. So, just a little bit about the notice in general before I turn it over to Marlisa to walk through some of the eligible activities, this notice supercedes the notice that we published last September, so that means the notice that we published last September, is no longer in effect, this one is instead. It re-establishes allocation amount and it announces re-establishes requirements that were in that notice, so if it's not in this notice it no longer applies and then announces new requirements. Additionally, just like in the last notice, the ESG program will apply unless... And the alternative requirement or flexibility is provided in this notice. Notice CPD-21-05, which I talked about is the rapid re-housing transfer notice that continues to apply and isn't impacted by this notice.

0:04:06.2 Brett: And if you are an ESG-CV recipient that has received an individual waiver you can continue to apply that individual waiver, irregardless of this notice and you can continue to apply for individual waivers if you need a flexibility that isn't provided for in this notice. As with the prior notice, everything that's in this notice, all the flexibilities and alternative requirements go back to when your community started preventing and preparing for and responding to Coronavirus, which is no earlier than January 21st, 2020 feels like forever ago. You have to maintain

documentation to assure that you're using the waivers and alternative requirements with eligible activities to prevent, prepare for and respond to Coronavirus. And then these waivers and flexibilities apply to all ESG-CV funds, no matter when HUD reviewed your substantial amendments or action plan. And I think at this point, I turn it over to Marlisa to... Yeah, to talk about the applicability to annual ESG funds and also to start to walk through some of the new eligible activities.

0:05:28.4 Marlisa: Hi, everybody. Great to be with you today. As Brett said I'm gonna go over or touch on the notice's applicability to annual ESG-CV funds. So, please be aware that the notice is applicable for all 2020 and older funds that are used to prepare, prevent... Prevent, prepare for and respond to Coronavirus when they meet the conditions in section four of the notice. So the section four of the notice outlines all of the required documentation that has to be completed in order for those annual funds to be used in accordance with the flexibilities that are available for ESG-CV funds, so those flexibilities are available to you if you complete the documentation requirements through September 30th, 2022. And one of those requirements is documenting how the funds are being used to prevent, prepare for and respond to Coronavirus. We use that for short PPR Tieback for short, which is also used, I think as a shorthand by the Office of Black Grant Assistance that administers the CDBG program. They recently published a reference document that explains the level of documentation and connection.

0:06:49.5 Marlisa: So in other words, the PPR Tieback that we're expecting to see for funds used for current Coronavirus response. We similarly have posted a reference guide, a quick guide on the Tieback, the PPR Tieback that we're expecting to see for ESG-CV as well as annual ESG funds used for Coronavirus response. In general, the questions that we're receiving from grantees sorta indicate that you all are applying a higher stricter standard than what we're expecting.

0:07:29.0 Marlisa: Next slide, please. We expected the PPR Tieback to be made at the component level, so in IDIS, you're setting up one activity for your entire grant program, this is applicable to recipients. For street outreach, Emergency Shelter, Rapid Re-housing Homelessness Prevention and HMIS. So we are not looking for you to establish a connection at the household level or by program participant on how they are... Services or assistances needed because of COVID or how they've been personally impacted by COVID. We're looking to see your general COVID response at the community level, and we wanna see how your entire street outreach program, your entire emergency shelter program that you're implementing throughout your jurisdiction, how that's being used to respond to COVID.

0:08:31.9 Marlisa: So the documentation needs to be included in the activity description in IDIS and should include specific activity type, so you can be general, saying that you're using your rapid re-housing component to ensure that people are spending a minimum amount of time in unsheltered or sheltered situations to minimize their risk of contracting COVID or to pass on the infection to others, so that's reminiscent of ESG activities in general, they're life-saving in nature, and so just by virtue of doing street outreach and providing engagement services through your street outreach programs or maintaining an emergency shelter keeping the doors open, making sure that it's habitable and functional, you are contributing to your community's Coronavirus response. So we're not looking for that individual program participant level documentation to see how individuals are impacted by COVID. We're looking at it more at the systems level.

0:09:48.1 Marlisa: Next slide, please. These are the new additional eligible activities that were

added to the ESG-CV notice, so you'll see that it's cell phones and internet, we wanted to make clear how cell phones and internet costs could be covered, and in the full expense of that, PPE, is now expanded to Homelessness Prevention and Rapid Re-housing program participants, furniture and household furnishings, renters insurance, expanded use of centralized or coordinated assessment costs, essential services. Under that... You'll see under the shelter component are now eligible for program participants served under rapid re-housing, homelessness prevention, and those in hotels and motels. You can now use ESG-CV for vaccine incentives, laundry services, and sponsor-based rental assistance.

0:10:45.4 Marlisa: Next slide, please. So we're gonna dig into more nuances about each eligible activity, starting with cell phones and internet. So you're now permitted to provide costs for temporary cell phones for individuals and families experiencing homelessness. So this isn't the outright purchase of cell phones for program participants, you, as the recipient or service recipient need to maintain ownership of the cell phone, but you're lending the cell phone out to your program participants. And similarly, the wireless service plan has to be yours, but you can provide the service for program participants. You need to make sure that it's used for activities necessary to obtain, maintain housing, so that would be case management, other essential services, and there's also... This cost can be provided for participants in COC programs, YHDP, ESG Rapid Re-Housing participants in ESG Homelessness Prevention as well as COC and YHDP permanent supportive housing projects.

0:11:58.4 Marlisa: Next slide, please. So under the older notice, CPD notice 20-08, the cost of PPE were limited to... So program participants were limited to emergency shelter and street outreach, and we've expanded that to purchase for a PPE such as masks, hand sanitizer for program participants as a service for those receiving Homelessness Prevention and Rapid Re-Housing Assistance, so that's a wider use of PPE that's now eligible.

0:12:41.0 Marlisa: Next slide, please. Furniture and household furnishings, and we know that this is already an area where we've gotten a number of questions. So hopefully this will be able to provide a little bit more clarity. Ordinarily, you cannot use ESG funds to purchase furniture or household furnishings under rapid re-housing or homelessness prevention. Now, under the notice you can use ESG-CV funds and annual ESG used to prevent, prepare for in respond to Coronavirus to purchase furniture and household furnishings for program participants. Similar to cellphones though, this is not... This is not gifting the furniture or household furnishings providing them to the, to the client for ownership, it has to be retained by the recipient or the sub-recipient.

0:13:35.0 Marlisa: So, and this is also subject to the requirements for equipment at in part 200 So it's important to pay attention to part 200.313. We've had questions about the type of overhead costs that could be eligible. So that's storage, repair of any broken furniture or furnishings, or a provider's moving costs. So, if a provider needs to move the furniture to and from a unit or if they need to store it somewhere could those costs be... Could be provided under this activity type and, yes, that's an eligible overhead costs that can be paid for as a part of the furniture or and household furnishings activity. Next slide, please. I'm going to turn it over to Brett to continue on with essential services.

0:14:36.6 Brett: Great, thanks Marlisa. So another thing that the notice does is that it opens up all of the essential services that are eligible for households during the emergency shelter components. So those that are receiving Rapid Re-Housing, Homelessness Prevention, or who are residing in hotels or motels paid for with the ESG-CV funds. So that means that now if you have somebody in

your Rapid Re-Housing program, you could use grant funds to pay for mental health services or outpatient healthcare or transportation to other eligible services like a doctor's appointment. Another new eligible activity is renters insurance, and this is for clients or program participants who are enrolled in Rapid Re-Housing or Homelessness Prevention program, and at the recipient level you need to demonstrate that the payment is necessary to obtain or maintain housing, so we know now that a lot of leasers require renters insurance in order to be able to rent the unit, so this now lets you pay for that.

0:15:43.5 Brett: It does clarify though that you need to pay this directly to the insurance company on behalf of the program participant, and you're not giving the money to the program participant to pay the insurance. Another new cost is for centralized or coordinated assessment or coordinated entry. And this allows you to use your ESG-CV funds to update, enhance and operate coordinated entry. So, no more do you... Can you only pay to use it where you have to prorate it in each of the components. This allows you, if as long as enhancements or updates are related to preventing, preparing for and responding to Coronavirus, including the economic downturn, then you can use ESG-CV funds to update your coordinated entry. And again, this is really to help make sure that CoC and ESG-CV funds are used to assist those who are the most vulnerable, and this means you can also pay for updates, incorporate EHV as they come online.

0:16:55.4 Brett: Another new activity is sponsor-based rental assistance. And so this allows you to do sponsor-based rental assistance much like in the CSE program under ESG-CV. And so, in this case the recipient or sub-recipient executes the sponsor-based rental assistance agreement with a sponsor, and then they subsidize the rent of program participants referred to housing units that they own or lease. Much like project-based, you can't commit ESG funding to be expanded beyond the period of performance, so even if the lease is a year if your grant term is eight months you can only commit ESG-CV dollars for eight months. And each unit in order to use sponsor-based rental assistance, each unit has to be occupied by an eligible program participant.

0:17:49.7 Brett: And then you can also use ESG-CV funds to pay for vaccines incentives about \$50 per dose for people experiencing homelessness. So this is not for people who are housed, it's for people who are currently experiencing homelessness as an incentive to receive one of the vaccines. And in this one, you can only use... So a lot of communities have vaccine incentive programs out there, there aren't necessarily targeted towards people experiencing homelessness but you can only use the ESG-CV funds to the extent that other vaccines incentives or vaccine incentives at all are inaccessible or unavailable to people experiencing homelessness within the community. And then you can use ESG-CV dollars to provide laundry services to people who are experiencing unsheltered homelessness. So, people who are living outside. Currently, you can do you can have laundry services in a shelter or in a day shelter, that's already eligible under the emergency shelter component. What this does is it allows you to pay for things like laundry trucks, and all of the overhead costs related laundry truck so gas, laundry detergent to bring those trucks to people in encampments or other unsheltered locations. Now I'm going to turn it back over to you Merissa to talk about IDIS.

0:19:20.5 Marlisa: Yes. I think a lot of you were anticipating this already. We're going to talk about IDIS set up, and also how to report these new activities. So, for IDIS set up, you're still going to follow the same process for setting up projects and activities you're gonna do one HGSE project per grant year, which I think in almost all cases this has already been done, so one fiscal year 2020 project, which is going to include both your ESG-CV grant as well as the fiscal year 2020 grant.

Both of those grants are gonna be separated because they have different grant numbers, but they're both gonna be under the same project in IDIS. And you're still gonna have just one activity per activity category, so under the 2020 project you're gonna have only one activity set up for street outreach, emergency shelter and so on. And we have guidance that's gonna be updated and released shortly, there's activity setup, IDIS activities setup guidance that's already post on the HUD exchange for your reference, and we're gonna be re-releasing that with additional information specific to these new eligible activities. They're all gonna be grouped within the existing eligible activity component.

0:20:44.5 Marlisa: Next slide, please. So, in next couple of slides we're gonna go one by one through each new eligible activity, and we've got a table here that includes the IDIS activity category and where it's gonna be reported in Sage. So cell phones and internet, that is gonna be categorized only under street outreach, and you're gonna report it under street outreach essential services. For PPEs you're gonna be reporting that under any of the four categories you see right there, for street outreach, emergency shelter, rapid re-housing, homelessness prevention, and you're gonna be reporting on it under street outreach essential services, emergency shelter essential services, rapid re-housing services and homelessness or homelessness prevention services, so it just depends on where... What part of your program you're funding it under. Furniture and household furnishings, that can be funded under rapid re-housing or homelessness prevention, and you would be reporting on it in Sage under rapid re-housing services or homelessness prevention services.

0:22:01.4 Marlisa: Just a quick note about furniture and household furnishings, I know that there's a lot of buzz about this activity in the chat and I know that it is not an ideal activity, since the furniture and household furnishings do have to be returned to the program at the end of the program participants participation in the program, however, it is there if a provider needs to use it, especially in emergency situations, if it's the choice between a client having a bed when they move in and not, he may wanna consider that. It's not ideal to reuse furniture, household furnishings but that is a requirement that's put in place that it cannot be provided for the program participants ownership it has to be returned.

0:22:57.4 Marlisa: Essential services for rapid re-housing and homelessness prevention that can be categorized or it needs to be budgeted under rapid re-housing or homelessness prevention in IDIS and then reported in Sage under rapid re-housing or homelessness prevention services. Centralized or coordinated assessment needs to be budgeted under Street Outreach, and it should be reported in SAGE as other ESG-CV expenditures as it's... It'll be identified as its own budget line item. And this is a good example. Obviously, expanded centralized or coordinated assessment activities are not a function of a street outreach activity, but we've used the street outreach activity type in IDIS as a workaround since we're not able to create a new activity type due to IDIS functionality, so that's the reason that it's budgeted under that category. Renters insurance can be budgeted under rapid re-housing or homelessness prevention, and then again, reported in Sage under rapid re-housing or homelessness prevention services.

0:24:09.1 Marlisa: Next slide, please. Vaccine incentives can be budgeted under any of these four activity categories in IDIS, and then in SAGE, it's gonna be reported under the other ESG-CV expenditures category as its own budget line item. Laundry is going to be budgeted under street outreach and then it will have a reporting category in Sage under your street outreach, hand washing stations, portable bathrooms and laundry services. And then finally, sponsor-based rental assistance is budgeted under IDIS activity category, under the activity type rapid re-housing or homelessness

prevention and then it's gonna be budgeted under rapid re-housing, rental housing or homelessness prevention rental housing. And with that I'm gonna turn it back to you Brett. Oh, and you are on mute.

0:25:22.8 Brett: Darn it. Okay, here I am. I'm gonna walk us through some of the additional flexibilities that are available through the ESG-CV notice including some important changes from the prior notice. So, one of the big ones is that the time limit on shelter and temporary emergency shelter activities has been removed. There used to be a January 31, 2022 deadline, and you couldn't use ESG-CV funds on an emergency shelter or temporary emergency shelter after that, that deadline has been lifted and you can now use your ESG-CV funds to pay for those activities through the expenditure deadline of September 30, 2022.

0:26:05.9 Brett: Another big change, so under the old notice if you used your money to acquire or rehabilitate property to make temporary emergency shelter, and then you stopped using it as temporary emergency shelter you then had to return the money back to HUD. This says that you don't have to do that, you can convert it if you convert it to emergency shelter, normal emergency shelter under the ESG program. So, in that case you then have to follow all of the requirements of habitability and environmental review and their requirements that are in the ESG rule, but if you do that you won't have to pay the money back to HUD. If you stop using it as emergency shelter though, then you trigger the disposition requirements in 2 CFR 200. Another big one, the time limit on medium term rental assistance has been lifted, so the old notice limited that to 12 months, now you can do 24 months of rental assistance under rapid re-housing and homelessness prevention, and we'll talk about an additional flexibility related to that.

0:27:15.7 Brett: Now, we've also waived the 24 months within 3 years on rental assistance and service costs, so now you can provide more than 24 months of rental assistance and more than 24 months of services to someone in a 3-year period of time. And then it used to be as it related to rental assistance, if somebody moved in it didn't matter when somebody moved in if you paid rent for a month, that counted as one month's rent. So now what the notice can do a little bit of flexibility to do is if somebody moved in after the middle of the month, that initial payment of the partial month doesn't count towards their 24 months. And again, that for all types of rental assistance, including project-based. And then we made another important change for project-based rental assistance that allows you to pay for a vacant unit for 30 days.

0:28:13.8 Brett: So right now, the rule is or under normal ESG the rule is you can pay for a month that somebody moved out of a unit you can finish paying that month and then you can pay the next month but somebody has to move in. What we're hearing is that sometimes it can take a minute, more than a month to identify a new program participant for that unit, so this lets you pay for a unit even if it's vacant for 30 days from the end of the month in which the other program participant moved out. But then if you wanna pay beyond that somebody new who is eligible has to move in. It lets you do sub-leasing, so you can enter into a sublease with a primary lease holder so long as it's allowed by state or local law and by the landlord. This is slightly different from sponsor-based rental assistance. And then, we know a lot of you who are administering ESG-CV are more used to HQS and habitability standards, ESG normally uses habitability. This allows you to use either HQS for habitability, you get to choose. It should be in your policies and procedures so. And then an important one, an important flexibility is you can provide housing relocation and stabilization services under homelessness prevention without conducting habitability or HQS inspection.

0:29:39.7 Brett: So for example, we know that some of you like to provide legal services to help people be able to stay in an apartment, you don't have to go and conduct an HQS or habitability inspection of that apartment before you can provide legal services. If you wanna provide ongoing rental assistance then you do have to go do the HQS or habitability inspection but not to provide the services. The notice continues to waive the requirement to provide monthly case management, and it also provides some additional flexibility about how long you as a rapid re-housing provider traditionally can provide case management. The right... Under normal ESG the rule is you can provide 30 days of case management and charge it to rapid re-housing while someone's residing in shelter or on the streets, but after that if they haven't lived moved in the house then you have to charge that case management back to street outreach or emergency shelter. This now allows you to provide case management for up to 60 days before someone is housed while they are seeking housing. Additionally, you can sub-award to tried. We have also changed some of the requirements around... Around, instrumentalities and we have expanded the use of instrumentalities to include instrumentalities for Puerto Rico and other territories.

0:31:18.2 Brett: For the at risk of homelessness definition we... So, it has already been waived to very low-income. It have been raised from 30% of AMI to very low income. What we did with that for homelessness prevention, there used to then be a difference if you were coming in at that with risk of homelessness or homeless, it was 30% still if you are qualifying because you are one of the categories in homelessness. This says that to qualify for a homelessness prevention it's very low income which is generally 50% of AMI, and then it also says when it comes time to re-evaluate someone's eligibility for assistance, that has also been raised from 30% to very low income for homelessness prevention and rapid re-housing assistance. And I think this one is you, Marlisa.

0:32:14.5 Marlisa: Okay.

0:32:15.8 Brett: Oh, no, this is me. So sorry, I...

0:32:17.8 Marlisa: Go ahead. Yeah.

0:32:20.7 Brett: This one is me, isn't it? Sorry. So some things to think about. Now, we've walked through all of the waivers and alternative requirements that are new and the flexibilities and the new activities. So just some things to take away as you think about how to move forward with your ESG-CV program. It's critical that you focus these program participants on resolving their housing crisis first, and so that involves a few things. Keep in mind that rapid re-housing really has three components, it's not just providing rental assistance for security deposit to somebody and saying, "Good luck." It's helping them identify a unit and the landlord who will rent to them. It's helping them understand the conditions of the lease, it's providing any necessary rent and movement assistance, and it's providing case management and wrap-around services to help them maintain stability in and the housing. That doesn't mean that you have to provide all of those through your ESG-CV funds, but it does mean that all of those should be made part of the package that someone can receive when they're receiving rapid re-housing assistance, and it can be funded by you or by another provider and connected to those services.

0:33:36.9 Brett: Again, focus on getting somebody housed and stabilized in their housing, connect them to the resources that will support their behavioral health and other needs of the family, and do that all in a trauma-informed way. The experience of becoming homeless and then transitioning back into housing can be traumatic and can bring up a lot of things for people, so make sure that

your case managers and the folks that are interact... And your system, really, is trauma-informed and client-centered. And then again, this is really about being client-centered after somebody has obtained housing and is starting to stabilize, start that conversation about what's next for the household. How are they going... The assistance under ESG-CV is temporary. So what's next for the client when the assistance is gonna go away? What employment or other monthly income can you connect them to? What mainstream services can you connect them to? And if it becomes needed, what deeper interventions or longer term subsidies are available, if they really do need more than just a short-term subsidy? But don't assume that everybody who ranks very vulnerable when they come into your rapid re-housing program is going to need a longer term subsidy. Again, meet with each client and figure out what is needed as they are receiving assistance through your program. And now I think I'll turn it over to you, Marlisa.

0:35:12.3 Marlisa: Yes. Okay, before we... Before we head on out to discuss some of your questions, we'd liked just to take a second to pause and just facilitate a conversation about how you can change your ESG-CV approach based on the changes in the notice. So first, we want to acknowledge that much has changed since last year when communities began the COVID response. So this is an opportunity right now to re-evaluate your strategy for using ESG-CV funds to adjust the severest housing needs. This is really a once in a lifetime opportunity. We don't know when we're gonna get this level of funding again, so focus your ESG-CV resources on housing the most vulnerable people in your community, especially those who are experiencing literal homelessness. If you've implemented non-congregate shelter during the pandemic, this is an opportunity to permanently house those individuals, and to ensure that no one returns to shelter or unsheltered homelessness.

0:36:21.5 Marlisa: So some of the things that you can consider are reprogramming homelessness prevention funds, if you've budgeted those to rapid re-housing, with the tremendous amount of money that's been made available to communities through your treasury Emergency Rental Assistance Program, ERAP. Those funds are especially useful for eviction prevention, the documentation requirements are flexible and it's frankly easier to use ERAP or eviction prevention than it would be an ESG homelessness prevention, so that's a really strategic move that you can make. Also consider using ESG funding to provide supportive services to support households receiving emergency housing vouchers, that's an eligible use of ESG funding, and those wraparound services can really foster housing stability for those receiving EHV. You can also consider using ESG for landlord incentives in a really strategic way, as well as to support landlord engagement activities. And that will help broaden access to available rental units. Landlord incentives are intended to make it more accessible available housing stock for program participants to obtain housing. And you can also consider using ESG funds to provide vaccine incentives to people experiencing homelessness.

0:37:46.0 Marlisa: We're seeing this more and more now, that this could make the difference between someone choosing to be vaccinated or not. We've reached a saturation point now with supply of vaccine no longer being an issue or holding people back from being vaccinated. But right now, it's a matter of having those longer conversations, the one-on-one interactions, not giving up on people who may say that they're hesitant to be vaccinated in this moment, but understanding that it just... It's the ongoing conversations, the outreach, the street outreach presence is really what's going to make a difference in the lives of many. Also, depending on those who are trusted, persons of support in people's lives such as healthcare for the homeless clinicians, PCPs, case managers, shelter staff. These people, you, can make a real difference in the lives of those we serve and being

that constant source of support and ability, or frankly access to vaccine in many cases.

0:39:00.4 Marlisa: ESG-CV can also be used to continue infection control protocols such as maintaining social distancing, providing PPE, additional staff, so to be able to enforce masking protocols. We're seeing more and more with the Delta variant being so infectious, the level of transmission going up across the country, now is not the time to let up on infection control protocols. It's also the time to consider, if you have back peeled back any measures, any precautions to think about re-instituting them to keep people safe. Even in those areas where we're seeing the vaccination rates at a pretty high level, and transmission rates at a pretty low level, we know that this can turn around dramatically. So masking, social distancing, other infection control protocols are just as important now as they ever have been. So use ESG-CV to support that. Continue supporting on-site vaccination and testing events in coordination with Public Health.

0:40:23.1 Marlisa: CDC recommendations are actually weekly testing, in congregate shelter settings. We know that this is a high bar and that many shelters don't have the capacity right now, and I also wanna really be upfront and cognizant about just the level of exhaustion that you all may be experiencing, but we need your help and your communities need your help to make sure that vaccination opportunities continue to be available, that testing continues to be ongoing. And HUD CA, we're here to support your community in whatever way we can. Please be in contact with us, reach out to us so that we can be supportive, especially if you're experiencing an outbreak, reach out to us as soon as possible.

0:41:14.7 Marlisa: Also begin to rethink approaches to emergency shelter and think about using ESG-CV to implement corresponding improvements for the long term. So build on the lessons learned and the progress that we've made in the area of public health and better conditions in emergency shelters that have resulted from COVID response, such as improved infection control measures. In other words, masking and additional spacing. These are all improvements that can be maintained and will help foster health within the shelter system for the long-term and enhance sanitation practices, keeping those up and ensuring close coordination and partnerships between local public health and health centers.

0:42:01.0 Marlisa: Is there a staff person that you could designate for coordination so that you're not relying on existing staff who have minimal capacity to add to their job descriptions? Are you paying your staff enough to keep them so that you're not losing shelter capacity with the loss of staff and turnover? Consider using ESG-CV in and making sure that not just your ESG funded staff are being paid well or increased increase salaries, but that that's done across the board in an equitable way.

0:42:44.6 Marlisa: In the street outreach realm.

[pause]

0:44:50.0 Marlisa: Abilities that you need to consider before reprogramming or re-allocating your funds. And then also think through whether or not you need to amend your con plan or annual action plan, use 24CFR91.505 as a guide. But frankly, from HUD's perspective there are a lot of flexibilities that we've taken into account and tried to make available to you all so that you are not hampered by red tape. Recognizing that some of those obstacles may be at the local level, and that you may need to coordinate with your local leadership to see if you could... If you can try to

implement flexibilities at the local level, but speaking from the HUD perspective, repurposing funds from one activity to another may not trigger a substantial amendment, and the difference between doing an amendment and a substantial amendment is different, if you're doing a substantial amendment you would need to submit that amendment for field office review, however, because of the waiver requirement, because of the waivers that we put in place you do not need to follow your assistance participation plan or conduct public comment period.

0:46:19.3 Marlisa: So, you could do a substantial amendment if the type of change that you're doing would trigger substantial and then post the change on your government website. Again, the field office can really be a big help in determining whether a change is substantial or not, or whether you would even need to make a change to your plan at all if you're adding an eligible new eligible cost. A lot of it depends on how dialed the language was in your plan to start with, if you're more specific and you're more limiting in your language then you may need to amend your plan but if you're using broader language that may already encompass a new eligible activity depending on what the change is. If you have any doubts please reach out. And, please don't forget that the public comment period and citizen participation requirements are waived, whether you have local requirements to that effect are a different question but for ESG-CV they're not required.

0:47:28.4 Marlisa: And with that I'm gonna turn it over to... Actually, before I do that I'm going to just flag some additional guidance that we have coming from HUD, the ESG-CV notice CPD-21-08 summary has been posted. So that's accessible to you now. We're also working on an ESG-CV case file toolkit, which will help you organize your case files in anticipation of a monitoring visit. A guidance document on changing your ESG-CV approach which we'll get more detailed in what I just covered as far as amendments go. And the prior guidance about considering changes that you may wanna make to your ESG-CV program.

0:48:14.4 Marlisa: And then an IDIS fact sheet for ESG and ESG-CV funds. The set up is gonna be largely the same and an IDIS factsheet is already available, but we're gonna be making update to that to ensure that the new eligible activities are included there and that everything reflects the changes in the ESG-CV notice. Please keep checking the HUD exchange for additional updates and we will be sure to be responsive to you all based on AAQs and questions that we get. We're always looking for feedback to see what kind of resources we can provide to help support you in the work that you're doing. Thanks so much, and I'm gonna turn it over to Mica to kick off our Q&A.

0:49:01.7 Brett: [0:49:02.8] ____ facilitate all the questions that have been coming through the chat and we'll answer some of them live.

0:49:08.4 Micah: Well, maybe not all the questions, but as many as can get to, thank you. Brett, can you hear alright?

0:49:18.9 Brett: I can.

0:49:20.6 Micah: Okay, great. Well, thanks everybody. As you can see, we are still in working remote mode and recovering, so we're doing a little preventing, preparing for and responding to Coronavirus on the fly here. So, I just wanted to go back through some of the questions and I actually just wanted to start back at the beginning, Brett, if I can, hand it back to you, a lot of questions about the eligible date or the applicable date of these waivers and if you can just kind of start where we started at the very top and talk about when these additional activities, when these

waivers, when the notices is retroactive to and how it supersedes the prior notes.

0:50:12.4 Brett: Yep. And maybe I should check Marlisa, are you back?

0:50:17.5 Marlisa: Can you here me?

0:50:19.2 Brett: Yes. Okay, cool. She's back too. I didn't wanna have to take all the questions on my own. So the ESG... All the notice, all the requirements in this notice are retroactive, so they go back to the date that your community started preventing, preparing for and responding to Coronavirus, which is no earlier than January 20, 2020. Now, you may or may not have costs going back that far, but if you do it does allow you to charge those costs going back to that period of time.

0:50:54.8 Micah: Alright. Great, thank you. And Marlisa, I will hand to you, we've got lots of questions about cellphones purchased with ESG-CV funds that maybe not been returned and then furniture, of course, household furnishings that may not be usable or might not have the desire to re-use those when their period of use is up. So I just wanted to see if generally, you had any guidance on how to handle that? And I believe we've put and I can put back in the link to 2 CFR 200 that talks about all equipment, any equipment that we've ever bought with ESG funds.

0:51:40.2 Marlisa: Yeah, I just wanna sort of caveat this with that, furniture may not be an ideal activity that you want to fund with ESG-CV. I think that the regulations that we're bound by it are pretty restrictive, and I completely get the concern about having a conversation with one of your clients and saying, "You know, here's your bed for now, but we're gonna have to take it back at some point." So obviously, it'd be ideal if you're able to use furniture costs as an initial emergency, act like in emergency situations where, "Wow, there's no way, we can't get a bed from the Salvation Army. We don't have any other funding available, let's just use ESG to make sure that there's a bed in the unit, when our client comes in, then you can try to think of a way in a longer term to replace that bed with something that the client can keep permanently and then take the bed back for potential future use. You may not want to use this at all. And that's totally fine." And while I was speaking to myself before, hopefully you got some of that, there's so many other life-saving uses for ESG, vaccination incentives, testing, so in general, you do need to follow the Part 200 requirements including the threshold, the \$5000 threshold.

0:53:17.5 S32: It does need to be returned from the program participant to the projects, so to the provider, and the disposition requirements do need to be followed based on how much the furniture item costs. So I would say that look to your Part 200 resources and the reg itself as a first steps in understanding the parameters, and then the AAQ is always available to you if you have specific questions about a particular situation.

0:53:57.1 Micah: Yeah, great, thank you for that. And I think I can take this one just the... Well, what if it doesn't come back? And I believe that we would say that will leave that to agencies, providers, recipients and sub-recipients to determine through their written standards what if... Just as they would do with any other equipment. Anything to add there for either of y'all?

0:54:23.7 Marlisa: No, I think the key is like treating it like you would other equipment. If you were... I think one of the good example that came up is like a computer. If you didn't get a computer back from one of your staff, where if a computer broke, you would fix it and that would be an eligible overhead costs, so sort of use those parameters as a way to get a grasp of what can and can't

be done under furniture.

0:54:54.3 Micah: Great, and then Brett, just to follow up, another question was about how we can apply these additional flexibility and additional activities to ESG funds moving forward as we look ahead to our next annual allocation of annual ESG.

0:55:12.8 Brett: Yes, and I will share this one with Marlisa, 'cause there's an IDIS setup that's due, I think. But you can only apply it to annual ESG-CV funds from fiscal year 2020 and prior. So you can't apply any of these flexibilities here, fiscal year '21 or any future funds, and that's because of a limitation imposed in the CARES Act. And then you can only apply these flexibility to annual ESG funds that you are using to prevent, prepare for and respond to Coronavirus. And there's some very specific things that you have to do in IDIS to be able to do that. And for that I'll turn to Marlisa.

0:55:57.7 Marlisa: Yes, so use Section Four of the notice as your guide, you can almost see it as a checklist for the type of documentation that you need to make sure that you complete. One would be in your activity description, identifying the 2020 funds or if it's older funds in the 2019 activity description, for example, what you're gonna be doing as far as COVID response. And then you also need to do... You need to amend your Con Plan, so you need to make sure that you go in and identify that you're gonna be using annual funds for COVID response. We're gonna have a resource that's gonna be available soon to just go through the steps that need to be taken for amendments. Please remember that there are a number of flexibilities that are at your disposal. If you're doing a substantial amendment, you do not need to do a citizen participation or public... You don't need to implement the public comment period, so that is now the case for annual funds as well. So I think a lot of times people think, "Oh, this is a substantial amendment, now I'm gonna have to go through this lengthy process." That's not the case. You would just need to update the plan in IDIS, have your field office review, and then make sure that you're posting the amendment on your website.

0:57:29.8 Marlisa: If it's a regular amendment, so it doesn't rise to the level of a substantial amendments or... And this is even a case for subsequent amendments, like if you wanted to go into your 2020 plan and shift some of your resources from HUD's perspective, and I completely understand that in many cases, the administrative burden is often at the local level. But from the HUD perspective, you can go in there, make an amendment, and if it's not substantial, then you have to notify the field office at some point during the program year just to let them know that the change has taken place. And I will also open the floor to Mandy, Mandy Wampler now, or at any point to chime in if she thinks I've been a little bit too flexible, if she'd like to contradict everything I just said, or there are any other important details to add as far as amending plans goes.

0:58:31.0 Mandy Wampler: Hi, everybody! Marlisa, no I think that was a great response. I would just say reach out to your field office if you have any questions, sometimes think like the devil's in the details with some of this. So if there's any particular question that you have your field office is there to support you. 'Cause they'll be the ones that would be looking at any amendment in the system, so it's important to be in communication with your field anyway, just so that they understand what might be coming. Thank you.

0:58:58.4 Micah: Yeah, great, thanks. So I think Marlisa, on that note, and then maybe to get Mandy's perspective as well, it would be helpful, a couple of questions about spending plans, and I guess maybe the \$4 billion question is, is there anything in the new notice that extends out the expenditure deadlines of 20%, 80% or 100%? And then Mandy, I would turn it to you and say for

folks who are projecting right now to be a little bit below or nervous about where they might be in their actual spending and draw downs, what resources are available for them?

0:59:38.8 Marlisa: The ESGCV notice has not extended any of the expenditure deadlines. They are all the same, so September 30, 2021 for the 20% milestone. March 31, 2022 for the 80%, and then September 30, 2022 for the 100 for all of your entire award amount. So some of you or a number of you may have received or will be receiving outreach from CARES Act staff in the SNAP's office, alerting you that according to our projected calc... Or projections for where you will be September 30, 2021, whether or not you're expected to meet the 20% threshold or not. We do not... HUD does not wanna take money back, that's absolutely not something that we want to do, so the spending plan is there for you to show us. It doesn't look like it maybe in our QPR or we haven't drawn that much in IDIS, but here really is our plan. We have a solid plan for these funds, we're gonna spend the money, here's the time... Here's the time frame. These funds are spoken for, so don't take them back. Recapture is on the table for any of these deadlines. So I don't wanna say that that's not a reality.

1:01:08.9 Marlisa: It absolutely is, but the spending plan, although optional is a really encouraged way to show HUD, we have a solid plan, it's in place, it's ongoing, don't take our funds away. And the prompts in the spending plan, the questions that we asked are really trying to elicit, draw from you, the really solid, understandable reasons why you may not hit the mark on the exact date that we've established in the notice. So you have a chance to save yourself from [1:01:51.1] _____ capture situation by submitting a solid spending plan, and we'll continue to work with you throughout the process. So we're here to help and do everything that we can to avoid taking any money back, that's something that we absolutely don't wanna do.

1:02:05.4 Micah: Great. Anything to add there, Mandy?

1:02:10.8 MW: Yeah, so what Marlisa said and the folks should be aware that the spending plan template is available for your use, and I think that the template does a great job of helping provide some structure, but the template itself is not mandatory. I think the key takeaway from what Marlisa was saying is good communication, be in communication with your ESG-CV desk officer in your field office reps to a lesson on where you're at and what your barriers might be. We definitely don't wanna get to the deadline in September and not have heard from you, and not have had a sense of what your barriers were. So again, the template is available, it's not mandatory, but some form of communication is strongly, strongly encouraged.

1:03:05.1 Micah: Yeah, great. Thanks, Mandy. Brett, Marlisa and others, a lot of questions about using funds in combination with other federal funds or other local funds, CARES Act, the American rescue plan. So just some general questions about how to look out for duplication of benefits, can ESG funds be used to assist, for example, somebody in Supported Services for Veteran Families? Could the ESG-CV funds be paired with the emergency housing vouchers, which are rolling out across the country now and on down the alphabet soup there?

1:03:49.0 Brett: So yes, with some caveats. So it's important that for ESG-CV that when you're serving somebody they're eligible to be served, so usually what we see is that somebody isn't dually enrolled in an ESG program and another program, because once a person is housed unless they're at risk of losing their housing and again meet the definition of homeless or at risk of homelessness they're not gonna be eligible for ESG-CV. So you could totally see a scenario where you use rapid

re-housing with someone experiencing homelessness to help them do housing search and navigation, to pay a security deposit for somebody who's moving into a unit that will eventually be subsidized with the house insurance voucher or an EHV voucher. And then you could provide the wrap-around services with that voucher for up to 24 months.

1:04:44.6 Brett: Actually the notice waived the 24 months, so even longer if you want. So you could do that similarly with CoC, with SSDS, with all those other resources so long as the person is eligible when they're entered into the ESG-CV program. Another caveat is that you can't use ESG-CV resources to pay for something else that another resource is paying for so, if EHV is paying for the rental assistance you can't use ESG-CV to pay for the rental assistant.

1:05:17.5 Brett: The question we get a lot Well EHV is paying for this portion of the rent can be ESG-CV pay the tenants portion, and the answer to that is no. A lot of the ESG-CV services also keep in mind they are limited to those when other services aren't available within the community, so you'll just wanna watch out for that also, but yeah, it would be perfect to use ESG-CV with a lot of additional CARES Act and American Rescue Plan funds that are out there. Anything to add, Marlisa?

1:05:55.3 Micah: Okay, great. Marlisa, I think for you but somebody else jump in. Can sub-grantees contract services outside their agencies, for example, can a sub-grantee contract case management services to a third party or transportation to another agency?

1:06:14.8 Marlisa: Yes, that's definitely permissible. I would just say, it'd be good to check out the snapshot that we have on the HUD exchange that differentiates between sub-recipients and contractors to help you determine to part 200 guidelines if it's more appropriate for you to develop a contractor relationship or a sub-recipient relationship. So we can post that resource in the chat, but yeah, I would say really refer to part 200 in doing that making those decisions but that's definitely permissible for you as a subrecipient to do that.

1:06:56.3 Brett: Can I add on just really quickly there, probably they're just unrelated to what you just said Marlisa. So, in general if you're a sub-recipient you should also be checking if it's not clear in your sub-recipient agreement what you're allowed to do or not do you should be checking with your recipient to make sure that this is something that they're going to allow because recipients may choose not to adopt some of the flexibilities that we've provided or to put further guidance on them for their sub-recipients so, in all cases if you are a sub you should be in routine contact with your recipient if you have questions to make sure that it's something that's allowable under your specific awards.

1:07:39.7 Micah: Okay, great, thank you. And wanted to ask about coordinated entry specific to the side that we looked at earlier around reporting and so there were a couple of questions about kinda how that would work if you're using coordinated entry to support folks under the additional activities, and specifically I think do we... Would we expect to see in enrollment in both coordinated entry or an activity and in enrollment in street outreach if we're gonna be billing for coordinated entry under street outreach.

1:08:17.1 Marlisa: Okay, this is a really good question. We put coordinated entry costs under street outreach because we can't create a separate coordinated entry activity in IDIS, so it's just a work around... We don't consider coordinated entry or the expanded coordinated entry to be a street

outreach cost, there's no additional HMIS data entry associated with this expanded coordinated entry cost, so you are not creating a coordinated entry HMIS project, you're not reporting clients under a coordinated entry activity, and you actually can't or won't be able to submit a coordinated entry project type in Sage.

1:09:09.3 Marlisa: So your coordinated entry, your activities, the reports that you submit to Sage for QPR purposes and for annual keeper reporting can only be street outreach, emergency shelter, rapid re-housing, homelessness prevention, so you're not reporting on... You're not gonna be reporting on a coordinated entry project type you should not be setting up a coordinated entry project type. We're gonna have guidance that should come out very soon about funding coordinated entry activities ordinarily under ESG, so that will help I think clarify a lot of the budgeting questions and the reporting requirements. But in general, as a rule of thumb, do not set up a coordinated entry project type for HMIS reporting under ESG, and don't submit a coordinated entry to CSD to Sage. Any program participants that served under the ESG program needs to be reported under one of those four component types that I mentioned. I think there are actually a couple more, but coordinated entry is definitely not one of them.

1:10:29.5 Micah: Okay, great, thank you. Brett, A lot of questions about when can we kinda hit the ground running with this, is there a notification process, do we have to get approval?

1:10:42.0 Brett: Yep. So, you can hit the ground running with these right away, unlike the mega waivers offers to use the NYCP programs there's no field office notification required to start using these you might have to update some of your policies and procedures, you may have to do a substantial amendment to your com plan or your action plan, but you can hit the ground running and remember these are retroactive. So either you single back to January 20th, 2020.

1:11:09.6 Micah: Great, thank you. Yeah, and I would just note that we have a great document on its way to the HUD exchange imminently, I think I can say safely, to describe exactly what you need to do and calling out some of the waivers that would apply if you're updating your action plan including the reduced requirement for public comment and notice around that. Marlisa I think back to you, a question specifically. So we can document a COVID-related need or a PPR prevent, prepare for respond to Tieback for homelessness prevention at the activity level without having to show specifically for each household why that's required. Is that right?

1:12:00.0 Marlisa: That is correct. So we're just seeing at a system level, how your activity, your rapid re-housing project, or your activity, your rapid re-housing activity, your homelessness prevention activity as a whole is contributing to your community Coronavirus response, please take a close look at the PPR Tieback document because we've got some really specific examples for how you can document that even language that you could use, that gets that through the level of detail that we're looking at, but please don't put yourself through the burden of trying to substantiate at a client level, how they're impacted personally by COVID, we're not looking for a positive COVID test, we're not looking for a loss in income.

1:12:56.7 Marlisa: We're not looking for any specific household impacts from Coronavirus, we're looking at the system level, how is your rapid re-housing project as a whole contributing to the Coronavirus response. And as I said before, just by the nature of ESG activities, it's the life saving you're keeping people off the street out of congregate shelter when you're re-housing them, you're preventing them from going into shelter, if it's a homelessness prevention activity and that just by

virtue of preventing rental assistants, preventing the services that establish housing stability, that's the way that your community is preventing and mitigating the spread of the virus.

1:13:47.5 Micah: Great. Alright, I've lost track of my questions but I did see one I just wanted to mention about talking a little bit more about the fair market rent waiver and how that applies, and if folks are or are not familiar with documenting rent reasonableness, where they might find resources on how to ensure they're doing that.

1:14:19.3 Marlisa: I can start and then Brett feel free to add. But the FMR waiver is now applicable for ESG-CV funds as well as annual funds that are used to prevent, prepare for and respond to Coronavirus. Originally, the FMR waiver also applied to annual funds that were not used for Coronavirus response, that is no longer the case that waiver expired. So, right now the FMR waiver is limited to just those two categories, those two pots of funding. So, this is just another example of why it's a good idea to just to get through the documentation requirements and section four of the notice to ensure that you have the same flexibility with your annual ESG funds. And I'd say that we do have a snapshot on rental assistance, I'm sorry, on FMR and rent reasonableness including some information about how you can document the rent reasonableness requirement, which is in effect in all cases across the board, so we can post that in the chat, the snapshot that reviews the FMR rent reasonableness requirement.

1:15:43.1 Micah: Perfect, thank you. Brett, lots of questions about sponsor-based rent assistance and how it applies specifically, excuse me, there was a question earlier on about assisting more eligible individuals, couples and families, yes the agency can lease the unit and then sub lease to the eligible client, and wanted to see if that would be allowable under the new notice.

1:16:10.2 Brett: Yep. So that was part of the reason that we added sponsor-based rental assistance to the notice, we had heard that many of you were having trouble identifying landlords who would rent directly to someone experiencing homelessness but they might rent if there was the middleman of a non-profit or another agency. And so, yes, you can do sponsor-based rental assistance, there are some rules that apply in the notice, I think... I'm pulling it up really quickly. So the recipient or sub-recipient has to have a sponsor-based rental assistance agreement with the entity that's going to be the sponsor. The sponsor has to own or rent the unit. You can only pay rent to the extent that there's somebody eligible living in the unit, or to somebody that they can be payments that I talked about earlier with project-based rental assistance also apply. And then kinda everything else that normally apply, if you can pay first and last month rent, you can pay the security deposit, you can make monthly rental assistance payments...

1:17:25.1 Brett: You do have to, if I remember correctly, be careful about conflict of interest requirement, so if you own the building then somebody else has to do the HQS for habitability inspection, and then everything you read through in the notice where... Or in the ESG rule where it references owner or housing owner, that then means the sponsor. So that means that the lease is then between the program participant and the sponsor, for example. Anything else to add, Marlisa?

1:18:05.9 Marlisa: I will actually add one more thing to that, that is different than subleasing. So sponsor-based rental assistance is like a very formal where the non-profit or the other agency owns or rents the units on behalf of the program participants. The notice also allows for subleasing so you could, in theory, do this through a tenant-based rental assistance scenario where somebody picks the unit and they aren't entering into a lease with the landlord or the owner. They're entering into a lease

with the primary lease holder to sublease from them. And again, in that case, you're gonna wanna make sure you're following all state and local laws related to that, but the notice does allow those two different types of activities.

1:18:56.6 Micah: Great, thank you for that. And then a couple of questions around, I think the waivers for rental assistance, but also the additional eligible activity of renters insurance, just generally, is there a limit? How would folks know what's reasonable for renters insurance and can it be prepaid? So if the premium or the cost is due up front and not on a monthly basis, could that be pre-paid? And then around rental assistance, just kind of what limits are now in effect and when would those expire?

1:19:38.0 Brett: Okay, let me start with some of the renters insurance stuff. So as with all costs under the ESG program, you're gonna wanna make sure they're reasonable and appropriate. We can't give you a dollar amount on that, that really is determined on what renters insurance goes for locally. So much like you do rent reasonableness, for a unit, you're gonna wanna do a little bit of research about what renters insurance traditionally cost in your community, and is what you're paying reasonable and appropriate?

1:20:17.6 Brett: As far as how long you can pay for renters insurance, you can pay for it, so long as somebody is receiving, is enrolled in your homelessness prevention or rapid re-housing program. So if you're providing rental assistance throughout the 24 months, you could in theory pay renters insurance for up to 24 months. Does that sound right to you Marlisa? Okay, and then I think unless Marlisa is gonna answer rentals to get back to you on the pre-paid part of it, so I don't know if you wanna submit that to the AAQ, so we can get you an answer in writing, we're not to take that one back. And then what was the second round of questions, Micah?

1:21:02.2 Micah: Yeah, let me...

1:21:04.4 Brett: My brain can only hold so much.

1:21:04.5 Micah: And we appreciate it. And so... And don't let me pick on you. Marlisa, just to kind of what limits are there now on rental assistance, if any? And how long would those go forward for rental arrears? I think we've seen a lot of chat about if the arrears count for the limitations, and can you have kind of the mix bag, right? If I come in and I need both arrears paid and prospective or future rent paid, how can the program help?

1:21:39.4 Marlisa: So the 24-month cap is waived, so there's not currently the 24 months within a three-year period limit. So you could continue on through September 30th, 2022. This does not include rental arrears, so rental arrears are still capped at six months. Anything you would add, Brett, to that?

1:22:14.1 Brett: No. I think as with everything, you wanna be sure that you're working with program participants, you're only providing rental assistance as long as they need it to avoid returning to a homelessness situation and that you're really connecting them to the resources available to help them be able to pay for and maintain their own housing without assistance. We wanna be able to house as many people as we can, but we also wanna keep them housed, so it's a balancing act.

1:22:45.4 Micah: Great. Just one note there and thinking about record-keeping and looking ahead to documentation, especially for the additional, the new eligible activities always wanna note that while the flexibilities are retroactive, the duplication of benefits will likely prevent grantees, recipients, sub-recipients from going back and reimbursing themselves for cost previously paid with another source, even if those costs are now eligible ESG-CV costs. And on that note, given that some communities have previously offered different forms of vaccine incentives, but maybe just starting and thinking about moving forward, what type of documentation might be required for individuals, where, and what might that look like? Brett, do you wanna take a stab at that one?

1:23:46.8 Brett: I do only to turn it over to Marlisa. So I would say that at a minimum, you would want to make sure that you document that no more than \$50 has been paid per participant per dose, so you could do \$250 cash incentives for two doses, but making sure that each dose is only \$50 per program participant, the other major requirement for that is that the incentive can only be paid to people experiencing homelessness, so that's the same sort of eligibility documentation that you would ordinarily do, and that's not only to people who are literally homeless, but all categories under the homeless definition. So I would say those are the two major documentation requirements. Yeah, if you have any concerns though, please submit them to the AAQ.

1:24:58.9 Marlisa: Also [1:25:00.9] ____ should they be flagging that there isn't another program out there, that's also paying the vaccine incentive... Keeping that in their records.

1:25:12.7 Brett: That's right. So the other major requirements for vaccine incentives is that it's otherwise not available within the community, so we did get a question about being able to reimburse, using ESG to reimburse for cash incentives that have had been previously provided, that would be a very hard reimbursement to document since you had the other funding source to cover the vaccine incentive in the first place, so we are looking to see that for homeless... For people experiencing homelessness, other incentive, funding and sources for incentives aren't available, and that could be just looking at the incentives that your community is providing and maybe it's not effective or accessible or as relevant for people experiencing homelessness. Think about the accessibility of it, there's some pretty interesting incentives out there, but if it's doesn't... If it's not accessible or necessarily applicable for someone in a homeless situation, then that would be another way, even though vaccine incentives are generally available within the community to show that they're not necessarily available and accessible to people experiencing homelessness within your programs.

1:26:49.9 Micah: Okay. Okay, great, thank you. And so I did roll back the slides here just to show, and again, slide at the end of the recording will be posted on HUD Exchange as soon as we can get those formatted for everybody, but just wanted to pull up this slide in particular 'cause there are a lot of questions about where you would bill and where you would report on the vaccine incentives specifically. And so I think we just have a minute for one more question and just looking to see... I think I had one in particular that came up. It just it's come up again across a couple of different topics and in a couple other funding sources, but the question about landlord incentives, how, when and where to provide those, and just wanted to get your thoughts and best practices, if you all seeing it, how we're tapping into a very disrupted housing market, unlike any that we've ever seen, and how you all see renters insurance and other landlord incentives that are allowed through the notice being used.

1:28:10.3 Brett: I can start. I think that the housing... I don't think... With the housing market, the

rentals market is highly competitive right now, and so what we're seeing is recipients really use these funds to be competitive and to be able to get a landlord to rent to someone who is at risk of homelessness, or is experiencing homelessness and so we're seeing, I think, a lot of signing bonuses or the agreement to pay an extra amount of security deposits, so I think whatever it's gonna be useful for you as the recipients or subrecipient to really be competitive in that housing market and to make sure that you can get a unit for someone who otherwise wouldn't have a unit, anything to add, Marlisa?

1:29:02.6 Marlisa: We did get the question about whether landlord incentives can be used in sub-leasing situations, so while a landlord incentive can't be provided to the primary lease holder, you could potentially... There are ways that you could still provide a landlord incentive to a landlord, maybe the landlord does not allow sub-leasing, you could creatively use finding bonus to a landlord that may be open to sub-leasing when they ordinarily wouldn't. So that's sort of a distinction between how to use landlord incentives in a sub-leasing situation.

1:29:45.3 Brett: Yeah, and I think the only... I didn't mention, you can only use landlord incentives as it's necessary to obtain housing, so you cannot use a landlord incentive to help maintain somebody's unit that they are currently living in, so if it's helping someone get a new unit who is under homelessness prevention or if it's helping somebody move into housing that's currently preventing homelessness, that is another caveat for landlord incentive.

1:30:14.6 Marlisa: I'm gonna throw one more addition to that, I think that the repairs language and the cleaning language is throwing a lot of people for a loop, like the damages and the cleaning, that cannot be provided retroactively. In other words, you can offer the landlord perspective, like if there were to be any damage to the unit, we can include that as an incentive that we'll pay for it if it does occur, but you can't pay the landlord incentive retroactively after the damage has occurred, because as Brett said, it's meant to get someone into the unit to obtain housing, so that's another caveat.

1:31:05.6 Marlisa: Okay, so with that, I wanna thank everybody so much for joining us. You all asked some really great questions that we're gonna take back with us and use to provide future guidance and follow up with more clarifications. Please continue to submit questions to the AAQ as they come up and stay tuned to the HUD Exchange for additional resources that we're working on that we hope to provide really soon, and have a great...