

ESG-CV Supplemental Reporting Instructions #3

Supplemental to [ESG-CV Reporting Guidance](#)
Updated 10-4-2021

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Reporting on New Eligible Activities

There are a variety of new costs that are eligible expenditures under ESG-CV as outlined in [HUD Notice CPD-21-08 “Waivers and Alternative Requirements for the Emergency Solutions Grants \(ESG\) Program under the CARES Act.”](#) This guidance is to provide information to ESG recipients on how to report on each activity.

There is no additional Homeless Management Information System (HMIS) data collection required for any of the new eligible activities.

New eligible activities	May be budgeted under the following activities IDIS	Shown on Financial Report in Sage	Unique Activity Narrative Required
Cell phones - Loaning cell phones with wireless plans to program participants to conduct activities necessary for obtaining and maintaining housing. – For persons participating in an ESG or ESG-CV funded project	Emergency Shelter Street Outreach Rapid Rehousing Homelessness Prevention	Emergency Shelter – Essential Services Street Outreach – Essential Services Rapid Rehousing - Relocation and Stabilization Services (Services) Homelessness Prevention- Relocation and Stabilization Services (Services)	No
Cell phones - Loaning cell phones with wireless plans to program participants to conduct activities necessary for obtaining and maintaining housing. – For persons participating in a CoC or YHDP funded project	Street Outreach	Other Expenditures	No
Coordinated Entry COVID Enhancements - Assure coordinated entry system can quickly prioritize and connect people to appropriate housing and services to prevent and respond to coronavirus.	Street Outreach	Other Expenditures	YES

Providing essential services to households Hotels/Motels paid for with EG-CV funds.	Emergency Shelter	ES – Essential Services TES -Essential Services	No
Essential Services - Providing essential services to households in RRH, HP.	Rapid Rehousing Homelessness Prevention	Rapid Rehousing - Relocation and Stabilization Services (Services) Homelessness Prevention- Relocation and Stabilization Services (Services)	No
Furniture - Providing furniture and household furnishings to participants of RRH or HP while they are receiving assistance.	Rapid Rehousing Homelessness Prevention	Rapid Rehousing - Relocation and Stabilization Services (Services) Homelessness Prevention- Relocation and Stabilization Services (Services)	No
Laundry - Providing laundry services for unsheltered homeless.	Street Outreach	Street Outreach – Handwashing stations, Portable bathrooms, Laundry Services	Yes –in Handwashing Stations Portable Bathrooms, Laundry Service Narrative
PPE - Providing personal protective equipment to program participants.	Emergency Shelter Street Outreach Rapid Rehousing Homelessness Prevention	Emergency Shelter – Essential Services Street Outreach – Essential Services Rapid Rehousing - Relocation and Stabilization Services (Services) Homelessness Prevention- Relocation and Stabilization Services (Services)	No

Renters Insurance	Rapid Rehousing Homelessness Prevention	Rapid Rehousing - Relocation and Stabilization Services (Services) Homelessness Prevention- Relocation and Stabilization Services (Services)	No
Sponsor based rental assistance	Rapid Rehousing Homelessness Prevention	Rapid Rehousing - Relocation and Stabilization Services (Rental Housing) Homelessness Prevention- Relocation and Stabilization Services (Rental Housing)	No
Vaccine incentive payments	Emergency Shelter Street Outreach Rapid Rehousing Homelessness Prevention	Other – Vaccine Incentives	Yes

Note – Correction made to guidance to change sponsor based rental assistance reporting in Sage to “Rental Housing” 10-4-2021

ESG-CAPER CSV Uploads

Beginning on October 1, 2021 Sage will only accept the [2022 CAPER](#). All HMIS and Comparable Database Systems are required to update to the new 2022 Data Standards on that date. Likewise all reporting based on those standards, such as the ESG-CAPER report used for ESG-CV reporting is also updated with new [programming specifications](#). Uploads using the old format will not be accepted by Sage. Recipients are encouraged to be sure that both their HMIS Leads and VSP are aware of the requirement and have the capacity within their system for reporting in October.

Reporting Features, Tips and Reminders

What is an ESG-CV Project?

A project in ESG and ESG-CV is often referred to as a “program” in the community. A project is a specific shelter (ABC Shelter) or Homelessness Prevention program (e.g. ABC ESG-CV HP). A project may be funded to provide one or more eligible activities. For example, ABC Shelter may be provided funding from ESG-CV for essential services and for operating costs. This does not make the shelter two separate projects for reporting purposes

and it should not be entered as two separate projects in Step 3. It is still one project, ABC Shelter, and all the participants are reported in HMIS regardless of whether they received services.

A project in ESG-CV does not change when the ESG contract changes. If a project was funded with Round 1 funding and then again with Round 2 funding, it is still the same project. Recipients should not end a project and start a new project in the ESG-CV report unless there is a significant lapse of time between when the project was funded (e.g. more than 30 days) or a significant overreporting may occur.

Closing a project

Projects are closed when a project is no longer serving clients with ESG-CV funds. The month and year the project closes are to be identified in Step 3 on the project list in the field “Date Project Closed.” A common misconception is the “Date Project Closed” field should be the end date of the current quarterly report. This is incorrect, it is the date the projects ceased using ESG-CV funds and no longer served clients. By placing an end date in this field before a project has ended, it will cause a significant overcount of your participants.

If you made this mistake, please put in an AAQ as soon as possible and the Sage staff will help you correct this. To assist you, we have clarified the language in this field and added an additional confirmation. If you indicate the project has ended on the same date as the end of the reporting period, you will receive the error message below. Click “Correct, the project has ended” if the project is no longer serving clients with ESG-CV funding or click “Change to Ongoing” for a project that will continue to service clients in the next quarter.

Warning:

You have indicated that this project has stopped serving clients with ESG-CV funding and is now closed. If the project will continue to serve clients in the next quarter please select "Ongoing" rather than a date.

Correct, the project has endedChange to "Ongoing"

Starting Date for New Projects

The start date of the project is the month the project began serving clients with ESG-CV funding. Depending on how the jurisdiction contracted with the subrecipient, the start date could go back to the “reporting start date” originally established in Sage or earlier. Sage has now made it possible for a new project to start back as far as 1-21-2020. Please remember – the project starts when it begins serving clients and expending ESG-CV funding. From the projects page, you cannot edit the project start date of an existing project. Changing start dates on existing projects directly effects the bundles and the total persons reported. If you need to change a date for an existing project, please submit an AAQ clearly identifying the project, the date the start date should have been, and the reason for the change. Sage staff will assist you.

Follow the Stars in Sage

The ESG-CV report is logically consistent. If you identify a component on the Reporting Requirements form (the step that begins “Start Here”) that has expended funds, then you must identify the projects in Step 3 and send bundles out for the project’s CSV upload to the HMIS Lead or Victim Service Provider (VSP). You must also then enter the expenditures on the Financial Information form. If you identified an allowable activity uniquely authorized in response to COVID-19 on which you spent ESG-CV funds, you must complete the form in Step 5 by checking the appropriate boxes and providing a brief narrative. You must then have corresponding expenditures

on the financial information form. Doing any one of these things without the rest will cause your report to be rejected by HUD.

Report reviews by HUD

HUD's CARES Act support staff are reviewing all ESG-CV reports. The staff record in Sage if the report has been "accepted" as it was submitted, "accepted with comment," or "rejected." Sage will send the recipient an email identifying the review status. The review status and any notes, comments, or rejection information made by the reviewer to the recipient is found on the bottom of the report's launchpad. If the status was "accepted with comment," HUD is identifying an issue to you that did not need to be resolved through a rejection and resubmission but must be addressed going forward. If the status was "rejected" then the recipient must address the issue prior to submitting the next report. Issues which are not addressed by the recipient may carry forward causing the next submission to also be rejected. Timely attention and corrections to rejections is required.

Reporting Financial Information

The financial information reported in Sage is based on expenditures. Expenditures may be made by the recipient, subrecipient, or sub-subrecipient and should be gathered for reporting by the reporting deadline from all projects funded by ESG-CV. The recipient is required to report **all** expenditures regardless of whether they have paid the bill or subrecipient invoice or have drawn the funding from IDIS.

If a recipient identifies an expenditure in Sage that after later review of billing is found to be ineligible, the recipient should correct the expenditures in the current quarter's financial information under the "This Quarter" column. [i.e. Subtract the ineligible amount from the amount expended on that activity this quarter OR if no expenditures were incurred this quarter a negative amount may be entered in Sage.] If a recipient identifies an expenditure not charged in a previous report, they should add that charge to the correct activity line item in the current quarter's financial information for under the "This Quarter" column.

HUD does not expect IDIS and the ESG-CV report to balance each reporting period. In fact, the expenses in Sage should be equal to or more than the draws from IDIS. HUD will not audit that the same figures are shown each quarter between IDIS and Sage but does expect that at the end of ESG-CV funding the bottom lines are in balance.

Three-Day Hold

There is a 3-business day hold on all uploads. This hold is there to provide time for the HMIS or VSP contact to review the requests for data they have received from the recipient and identify any issues/corrections to the recipient. The recipient may then make any corrections necessary by clicking the "unbundle" projects button in Step 4 and correcting the error in the project itself in Step 3. Once corrections are made, the bundles should be created again, approved as necessary, and sent out.

Once uploads begin to be received in the report, the recipient will not be able to add or edit projects or correct the bundles. If an issue arises after the 3-day hold but prior to submission of the report to HUD the recipient should [Ask a Question \(AAQ\)](#) in the [HUD Exchange](#) identifying Sage in step 2 and providing as much detail as is necessary in the AAQ to make a correction to the report. The AAQ will not accept requests for changes to an ESG report from anyone other than the recipient (i.e. subrecipients, a consultant, the HMIS Leads or VSPs).

Reporting on Legal Services

Legal services are eligible expenses under ESG (and therefore ESG-CV) under the Emergency Shelter (ES), Rapid ReHousing (RRH), or Homelessness Prevention (HP) components (see 24 CFR 576.102(a)(1)(vi) and 24 CFR 576.105(b)(4) for a description of eligible legal services activities).

1. For Emergency Shelter
 - a. Legal services are eligible services under “essential services”. HUD assumes that persons receiving emergency shelter and legal services are already in shelters which are also receiving other essential services and/or operating funding. Therefore, the clients receiving legal services will already be reported in the shelter CSV uploads and no separate reporting by legal services is required.
 - b. If the majority of shelters in a community which has funded legal services are not subrecipients of ESG-CV funding the community must put in an AAQ, selecting Sage in step 2 for a review of the situation and a case-by-case determination of HMIS or comparable database requirements.
2. For Rapid ReHousing
 - a. Legal services may be provided under Relocation and Stabilization Services (Services). This, however, is not a stand-alone program and services may only be provided to persons enrolled in RRH. Therefore, the RRH project in the HMIS or comparable database system is already reporting on the participant and no client level data collection is required by a Legal Service provider or subrecipient to identify which clients received legal services.
 - b. If a community which has funded legal services under RRH have those services provided to persons in a project without a housing component then the community must put in an AAQ, selecting Sage in step 2 for a review of the situation and a case-by-case determination of HMIS or comparable database requirements.
3. For Homelessness Prevention
 - a. Legal services may be provided under Relocation and Stabilization Services (Services). Depending on how the Homelessness Prevention project is structured legal services may be captured in the HMIS or comparable database in one of two ways:
 - i. If the project is structured so that a subrecipient for Homelessness Prevention must refer the participant to a legal services organization then their will already be an enrollment for the client in the HMIS or comparable database system by the HP provider. No additional data collection is required by the legal services provider. (Note if the legal services are the only service the participant receives from HP then legal services and HMIS/comparable databased must work together to be sure the participants exit data is correctly and completely entered in HMIS.)
 - ii. If the project is structured so that the legal service provider is the HP project (e.g. legal services at the courthouse to prevent eviction, legal services walk-in clinic, etc.) then the legal service provider must have a Homelessness Prevention project set up in the HMIS and must be entering all the HP elements required. A legal service provider in this situation may elect to use a comparable database system. That system must be configured to collect all HMIS elements required for homelessness prevention and must be able to generate a CSV ESG CAPER report. No exceptions will be provided for CSV reporting in this situation.