



Iowa Statewide Emergency Solutions Grant
(ESG) & Shelter Assistance Fund (SAF)
Grantee Training
January 18, 2018

ESG & SAF Training Overview

ESG & SAF:

- Selected Program Requirements
- Financial Management
- Data & Reporting

Presenters:

Iowa Finance Authority:

Amber Lewis

Judy Hartman

Carole Vipond

Institute for Community Alliances:

Gary Wickersing

ESG Selected Topics

- HUD VAWA
- Equal Access
- Participant Eligibility
- Unit Eligibility
- Special Requirements for Rental Assistance

What Does a System-Wide Response to Homelessness Look Like?

National Alliance to End Homelessness:

<https://www.youtube.com/watch?v=xv6NzAQS0tw>

(1:00)

www.djsadhu.com

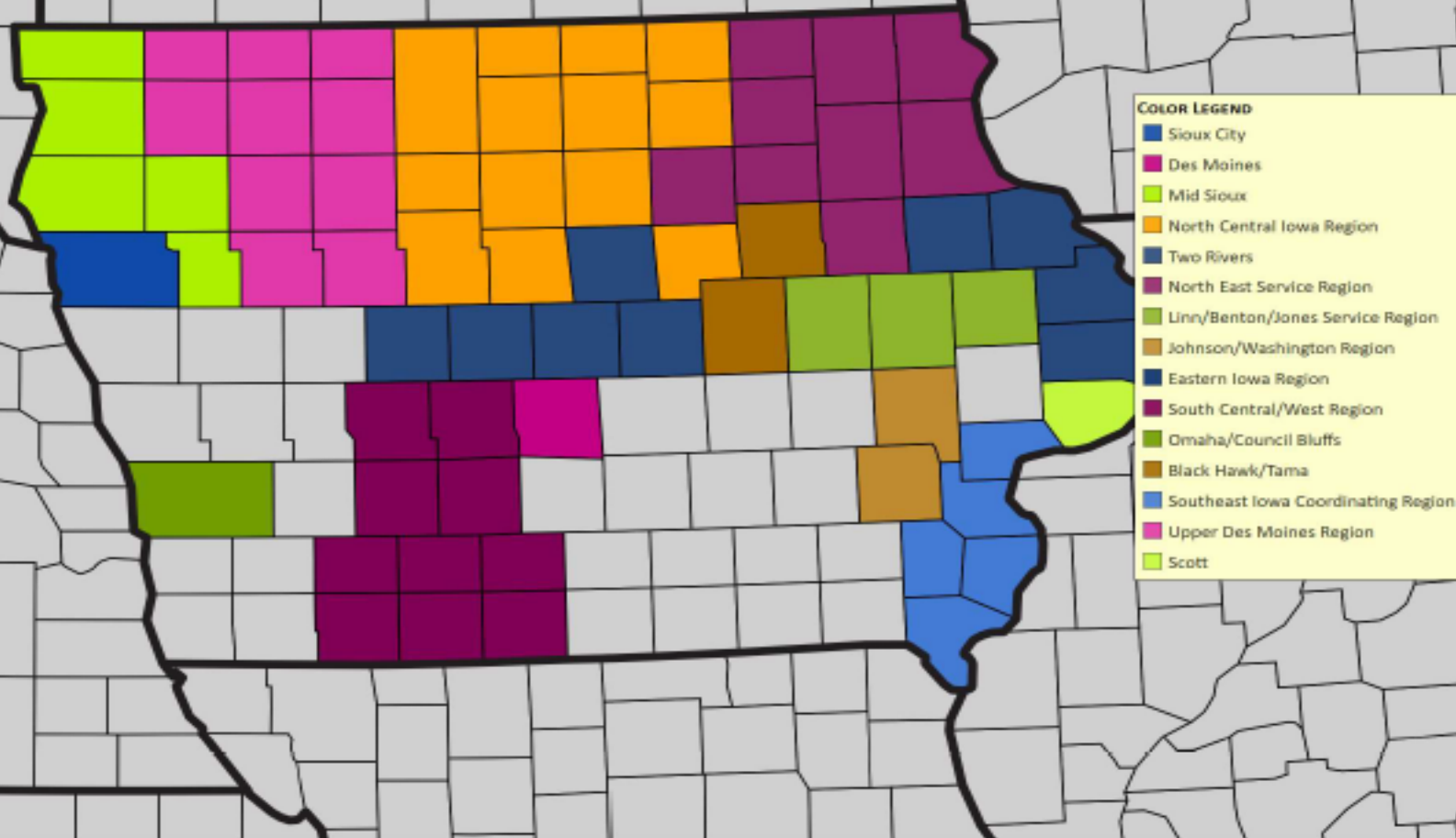


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Our part toward a System-Wide Response....

- ESG & SAF Combined Training
- ESG & SAF Combined Competition
- Focus on Coordinated Entry
- New system of Coordinated Services Regions
- Continued collaboration w/ Iowa Council on Homelessness

Iowa Coordinated Entry Regions



Six Goals of Coordinated Services Regions (CSRs)

Regional Coordination

Inclusive process to engage stakeholders

Coordinated Entry

Participation (supporting and expanding)

Data Coordination

HMIS participation, bed coverage, and the unsheltered PIT Count

Common Standards

For operations and services

Baseline Services Planning

Ensuring availability of at least emergency shelter and rapid rehousing

Balance of State Continuum of Care (CoC) Participation

Through Iowa Council on Homelessness

ESG & SAF Grantees in CSRs

- Participate!
- Find out your CSR(s)
- Attend meetings of your CSR
- Figure out if your CSR has at least shelter & RRH for all populations; if not, plan to get there
- Volunteer for a project (such as the PIT Count)
- Help another agency with their data system participation
- Engage in Coordinated Entry
- Attend Iowa Council on Homelessness meetings
- Join a committee of the Iowa Council on Homelessness

ESG & SAF

Selected Program Requirements



ESG & SAF Selected Program Requirements: First Things First

ESG: Federal program; to assist people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.

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

SAF: State program; to assist with costs of operations of homeless & domestic violence shelters, essential services for the homeless, and evaluation and reporting of services for the homeless.

ESG & SAF Selected Program Requirements: Participant Eligibility


- Definition of Homelessness
 - Four categories of Homelessness; note which one applies
 - See document, “HUD Homeless Definition & Recordkeeping”
 - <http://www.iowafinanceauthority.gov/Home/DocumentSubCategory/49>
- Documenting Homeless status
 - Ensure documentation is in client file
 - Generally straightforward for shelter; can be by recorded observation of intake worker



ESG & SAF Selected Program Requirements:

HUD's Four Categories of Homelessness

<https://www.hudexchange.info/resource/1974/criteria-and-recordkeeping-requirements-for-definition-of-homeless/>

 Homeless Definition			
CRITERIA FOR DEFINING HOMELESS	Category 1	Literally Homeless	(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: (i) Has a primary nighttime residence that is a public or private place not meant for human habitation; (ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or (iii) Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution
	Category 2	Imminent Risk of Homelessness	(2) 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 other permanent housing
	Category 3	Homeless under other Federal statutes	(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who: (i) Are defined as homeless under the other listed federal statutes; (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; (iii) Have experienced persistent instability as measured by two moves or more during in 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 4	Fleeing/ Attempting to Flee DV	(4) Any individual or family who: (i) Is fleeing, or is attempting to flee, domestic violence; (ii) Has no other residence; and (iii) Lacks the resources or support networks to obtain other permanent housing

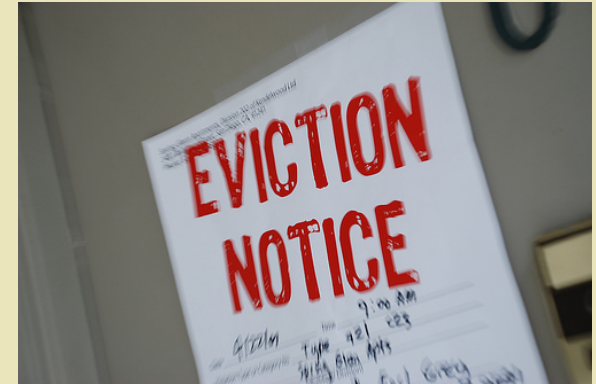
ESG & SAF Selected Program Requirements:

Participant Eligibility: HUD's Four Categories of Homelessness



Category 1:
Literally
Homeless

Category 2:
Imminent
Risk



Category 3:
Homeless
Under
Other
Federal
Statutes

Category 4:
Fleeing
Domestic
Violence



ESG & SAF Selected Program Requirements: Fair Housing

- National Fair Housing Law
- Iowa Fair Housing Law
- Agencies must follow both
- Put up posters at intake locations
- <https://icrc.iowa.gov/publications/2015-posters>
- https://www.hud.gov/program_offices/fair_housing_equal_opportunity/marketing





KEEP CALM

FAIR HOUSING IS THE LAW

(The Fair Housing Amendments Act of 1988 and Iowa Civil Rights Act)

DISABILITY
COLOR
RACE
RELIGION
FAMILIAL STATUS

SEX
NATIONAL ORIGIN
SEXUAL ORIENTATION
GENDER IDENTITY

Anyone who feels he or she has been discriminated against may file a complaint of housing discrimination by contacting:

HUD Kansas City Regional Office
400 State Avenue
Room 200
Kansas City, KS 66101
(800) 743-5323
<http://hud.gov>

Iowa Civil Rights Commission
400 E. 14th Street
Grimes State Office Building
Des Moines, IA 50319
(515) 281-4121 or (800) 457-4416
<https://icrc.iowa.gov/>



**We Do Business in Accordance With the Federal Fair
Housing Law**

(The Fair Housing Amendments Act of 1988)

**It is illegal to Discriminate Against Any Person
Because of Race, Color, Religion, Sex,
Handicap, Familial Status, or National Origin**

- In the sale or rental of housing or residential lots
- In the provision of real estate brokerage services
- In advertising the sale or rental of housing
- In the appraisal of housing
- In the financing of housing
- Blockbusting is also illegal

Anyone who feels he or she has been discriminated against may file a complaint of housing discrimination:

1-800-669-9777 (Toll Free)
1-800-927-9275 (TTY)
www.hud.gov/fairhousing

U.S. Department of Housing and
Urban Development
Assistant Secretary for Fair Housing and
Equal Opportunity
Washington, D.C. 20410

Previous editions are obsolete

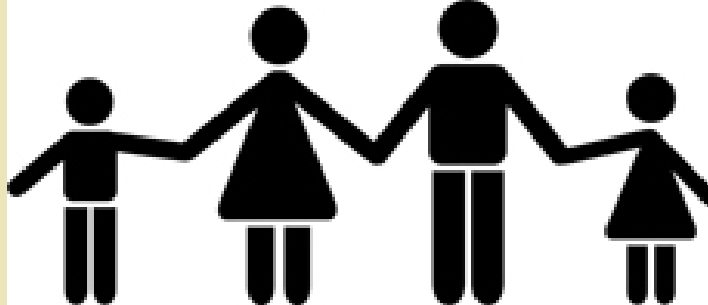
form HUD-928.1 (6/2011)



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ESG & SAF Selected Program Requirements: Prohibition Against Involuntary Family Separation

- The age or gender of a child under age 18 must not be used as a basis for denying any family's admission.



ESG & SAF Selected Program Requirements: Confidentiality

- Confidential records: All persons provided assistance
- Have written policies.
- Consider: Coordinated Entry systems, data-sharing arrangements, and client releases of information.
- Must protect against release of the address or location of any DV shelter, except with the written authorization of the person responsible for the shelter.

ESG & SAF Selected Program Requirements: Termination of Assistance



- Must have a written policy.
- Must recognize the rights of program participants.
- Client acknowledgement in client file.
- Termination only in the most severe cases.
- May still provide assistance again at a later date.

ESG & SAF Selected Program Requirements: Grievance Policy (Recommended)

- *Different* from Termination of Assistance
- Recommended: *Also* have written Grievance Policy to address issues not related to Termination of Assistance
- Examples:
 - Issue with the type or amount of services provided;
 - Disagreement with the client's case manager;
 - Complaint about a program policy, etc.



ESG & SAF Selected Program Requirements: Record of Clients Denied Services

- Must keep a written record of clients denied services.
- Not necessary if a program is full and therefore not accepting clients.
- Only necessary if a client is denied services because they do not meet eligibility or other program requirements.

ESG & SAF Selected Program Requirements: Client Files Checklists

- Sample forms:
<http://www.iowafinanceauthority.gov/Home/DocumentSubCategory/49>.
- Not required to use exact forms.
- Adapt as needed or use your own. But make sure they contain at least these items.



ESG & SAF Selected Program Requirements: Client File Checklists



Iowa Statewide Emergency Solutions Grant (ESG) Program SHELTER PARTICIPANT FILE CHECKLIST

Participant Name (Head of Household): _____ Date: _____

All Shelter participant files must include:

- ____ Signed Release of Information (any applicable)
- ____ Signed HMIS consent form (required if HMIS-certified for data-sharing community; strongly recommended otherwise, in addition to required HMIS notification posters)
- ____ Verification/documentation of homelessness
- ____ Signed acknowledgement of any applicable program requirements
- ____ Documentation of applicable services provided
- ____ Demonstration of referral and/or connection to other mainstream resources, as applicable
- ____ Housing stabilization plan if applicable
- ____ Termination letter if applicable—must describe appeals process
- ____ Other: _____
- ____ Other: _____
- ____ Other: _____



Iowa Statewide Emergency Solutions Grant (ESG) Program HOMELESSNESS PREVENTION OR RAPID REHOUSING PARTICIPANT FILE CHECKLIST

Participant Name (Head of Household): _____ Date: _____

Type(s) of Assistance Provided (circle all that apply):

Homelessness Prevention			Rapid Rehousing		
Rental Assistance	Other Financial Assistance	Housing Relo/Stab. Svcs	Rental Assistance	Other Financial Assistance	Housing Relo/Stab. Svcs
Short-term (30 mos)	Rent app fees	Case mgmt	Short-term (30 mos)	Rent app fees	Case mgmt
Medium-term	Security dep's	Mediation	Medium-term	Security dep's	Mediation
Arrears	Last month rent	Legal svcs	Arrears	Last month rent	Legal svcs
	Utility dep's	Credit repair		Utility dep's	Credit repair
	Utility pmts			Utility pmts	
	Moving costs			Moving costs	

All HP or RRH participant files must include:

- ____ Screening assessment/application
- ____ Release of Information (any applicable)
- ____ HMIS consent form (required if HMIS-certified for data-sharing community; strongly recommended otherwise, in addition to required HMIS notification posters)
- ____ Verification of homelessness or at risk of homelessness
- ____ Staff certification of eligibility for assistance (and recertification if applicable)
- ____ Verification of income (3-party preferred; Income Affidavit if applicable; etc.; also documentation of county Area Median Income; N/A at initial RRH assessment)
- ____ Habitability inspection checklist
- ____ Lead-based paint screening verification and any follow-up required
- ____ Demonstration of referral and/or connection to other mainstream resources
- ____ Housing stabilization plan (if applicable, including case notes if assistance is longer than one month)
- ____ Signed acknowledgement of any applicable program requirements
- ____ Documentation of financial assistance provided, including types and amounts
- ____ Denial letter if applicable—letter must state reason(s) for denial
- ____ Termination letter if applicable—must describe appeals process

If providing HP or RRH Rental Assistance or Rental Arrears, files also must include:

- ____ Copy of eviction notice if HP
- ____ Copy of signed lease agreement (or oral verification if only arrears)
- ____ Copy of landlord agreement between landlord and agency
- ____ Rent Reasonableness & Fair Market Rent verification (include documentation of FMR for applicable county)

Additional required documentation, as applicable:

- ____ HP or RRH Utility Assistance, Arrears, or Deposits: Copy of shut-off notice
- ____ HP or RRH Utility Assistance, Arrears, or Deposits: Current utility bill verifying service address and customer name
- ____ HP or RRH Utility Assistance, Arrears, or Deposits: Self-certification or other verification that client will become homeless if utility assistance is not provided
- ____ Other types of services: Verification that services are necessary for client to obtain/remain in housing



ESG & SAF Selected Program Requirements: Record Retention

- Maintain books, records and documents in sufficient detail to demonstrate compliance for a period of 5 years beyond the end of the grant period.



ESG & SAF Selected Program Requirements: Eligible Activities

ESG:

Shelter

Street Outreach

Homelessness Prevention

Rapid Rehousing

(And <5% data/reporting & <2% Admin)

SAF:

Shelter

(And <5% data/reporting)

Shelter



Making Emergency Shelter Work

National Alliance to End Homelessness:

<https://www.youtube.com/watch?v=daoyczOxZ0Q>

(1:09)



ESG & SAF Selected Program Requirements:

Shelters: Key Components in an Effective Crisis Response System*

- Housing First approach
- Immediate and easy access
- Housing-focused services
- Rapid exits to permanent housing
- Measure outcomes to improve performance

*From the National Alliance to End Homelessness

ESG & SAF Selected Program Requirements:

Shelters: Impact on System Performance*

- Average length of homelessness
- Exits to permanent housing
- Returns to homelessness

*From the National Alliance to End Homelessness

ESG & SAF Selected Program Requirements:

Focus on Shelters

Essential Services:

- Case management
- Child care
- Education services
- Employment assistance & job training
- Outpatient health services
- Legal services
- Life skills training
- Mental health services
- Substance abuse treatment
- Transportation
- Services for special populations

Operations

- Maintenance
- Rent
- Security
- Fuel
- Equipment
- Insurance
- Utilities
- Food
- Furnishings
- Supplies
- Hotel or motel vouchers if no shelter available

ESG & SAF Selected Program Requirements:

Shelters: Accessibility

- Readily accessible to and usable by individuals with disabilities.
- Provide reasonable accommodations for an equal opportunity to participate.
- If shelter is inaccessible and is not feasible to retrofit, plan for an alternative way to provide services.
- Must have a written policy.



ESG & SAF Selected Program Requirements:

Shelters: Fair Housing—Assistance Animals

- Not pets.
- Animals that work, provide assistance, or perform tasks for the benefit of a person with a disability, or provide emotional support that alleviates symptoms or effects of a disability.
- Examples:
 - Guiding individuals who are blind or have low vision
 - Alerting individuals who are deaf or hard of hearing to sounds
 - Providing protection or rescue assistance
 - Pulling a wheelchair
 - Fetching items
 - Alerting persons to impending seizures
 - Providing emotional support to persons with disabilities who have a disability-related need for such support.
- Not required to be trained or certified.
- Dogs or other animals.



ESG: FHEO Notice 2013-01, Service Animals and Assistance Animals for People with Disabilities in Housing and HUD-Funded Programs.

ESG & SAF Selected Program Requirements:

Shelters: Fair Housing—Assistance Animals (cont.)

Evaluate a request for a reasonable accommodation for an assistance animal.

- 1) Does the person have a disability — *i.e.*, a physical or mental impairment that substantially limits one or more major life activities?
- 2) Does the person have a disability-related need for an assistance animal?

If YES to BOTH, must provide accommodation

- Some limitations and exceptions allowed.
- See full notice for details.

ESG & SAF Selected Program Requirements:

Shelters: Habitability Standards

- Must meet HUD habitability standards for Shelters
- No special certification for the inspector
- Different from Housing Quality Standards (Section 8, etc.)
- HQS more stringent in most areas (exception of fire safety)
 - Include plan for hearing-impaired residents (mobile unit is okay).



ESG and SAF Shelter Habitability Checklist:

<http://www.iowafinanceauthority.gov/Home/DocumentSubCategory/49>

- 1) Have a written plan for regular inspections
- 2) Assign a specific staff person to be responsible
- 3) Document results of each inspection and any follow-up actions

ESG & SAF Selected Program Requirements:

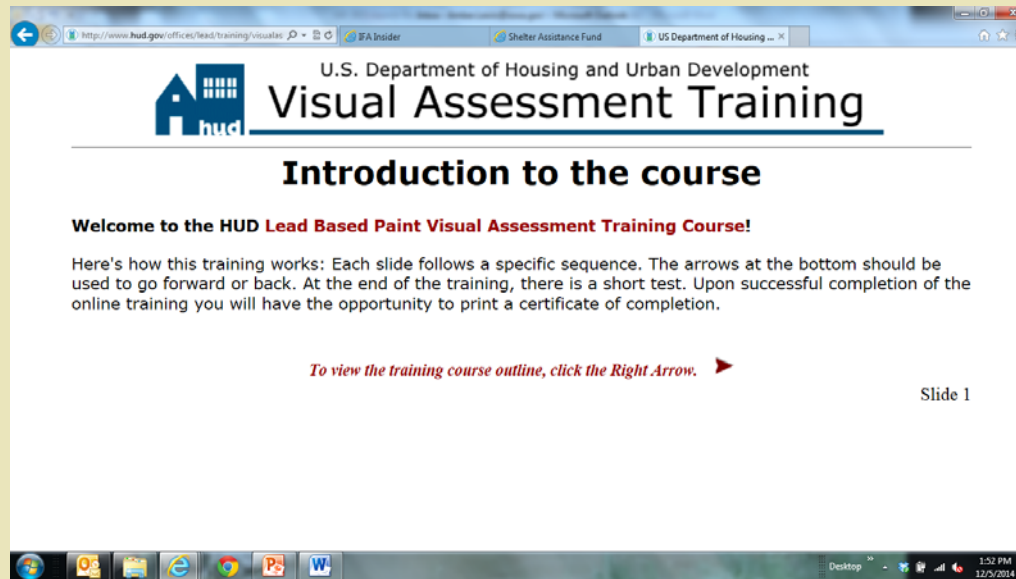
Shelters: Lead-Based Paint

- Visual inspections IF
 - 1) Facility built before 1978 AND
 - 2) Serving children under six or pregnant women
- Short online training to become certified visual inspector (half-hour or so). Anyone can become certified!

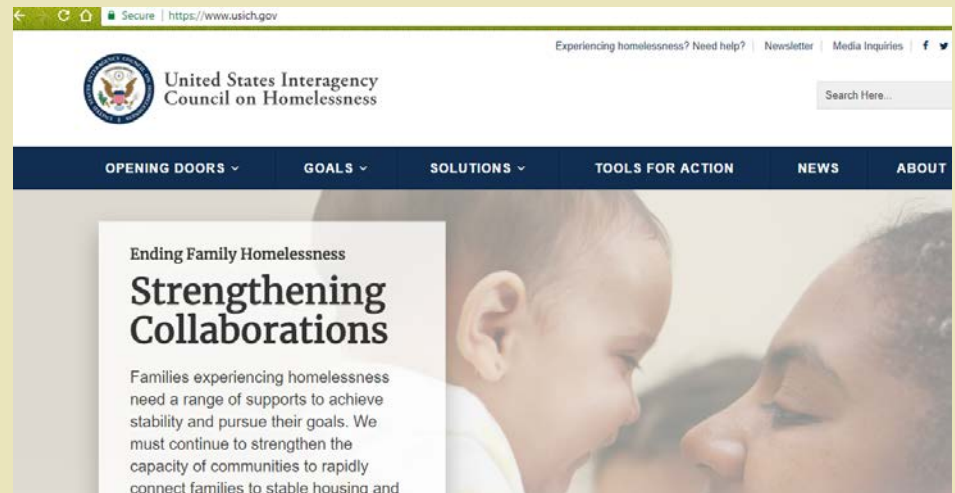
ESG & SAF Selected Program Requirements:

Shelters: Lead-Based Paint Training

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



Other Resources....



Other Resources:

IowaHousingSearch.org



- Free training for staff

Other Resources: Iowa Council on Homelessness

- Meetings every other month, third Friday, 10:00 a.m. (next mtg Jan 19th)
- IFA or conference call
- 38 governor-appointed members
- 7 committees
- Open to public
- Decision-making body for Iowa Balance of State CoC

<http://iowafinanceauthority.gov/Topics/TopicIowaCouncilOnHomelessness>



Other Resources: Iowa Quality Standards

<http://www.iowafinanceauthority.gov/PageSection/Index/1>

- Developed with State Public Policy Group, through Iowa Council on Homelessness and Iowa legislative appropriations
- Recommendations for homeless programs in four areas:
 - Governance
 - Operations
 - Services
 - Performance



Other Resources:

Iowa Nebraska Peer-to-Peer Homelessness Symposium

Save the Date:

June 13 – 14, 2018

Des Moines University

Hosted by HUD Iowa & Nebraska Field Offices

Quiz

- 1) When does an agency have to document when someone is turned away from shelter?
- 2) How does someone become certified as a shelter habitability inspector?
- 3) Does a shelter built in 1981 have to do a lead paint inspection?
- 4) Which one should an agency follow: state or federal Fair Housing laws?
- 5) How long should an agency keep grant records?
- 6) Which HUD homeless category applies to persons in shelter?
- 7) When can a family shelter deny entrance to a family's 16-year old child?
- 8) How would a client know about an agency's Termination of Assistance policy?
- 9) Which clients' records must be kept confidential?
- 10) A shelter could pay for night security staff out of which one, Essential Services or Operations? How about a case manager?

ESG & SAF Selected Program Requirements: Monitoring Visits

- Usually arranged in advance
- Random sampling of client files—around 10% or at least 5 files
- Additional agency documentation: last month financial statements, board meeting minutes, recent audit/financial review, financial policies/procedures, program policies, personnel policies, etc.
- If a shelter, also habitability inspection
- Include interviews with program staff, financial staff, case manager, and often a client (arranged by agency)
- Follow-up afterwards: Letter with any Findings, Concerns, Recommendations, and required actions

Meet Laura Abbott, Iowa Finance Authority, Asset & Grants Manager

Financial Management



Financial Management: Basics

- Both ESG and SAF transactions must follow the budget as submitted in the approved Application. Significant changes to the budget must be approved in advance by IFA staff.
- All transactions must be clearly identified in records.
- Copies of records must be maintained in project files—five years.
- Payments must not be made directly to clients for anything grant-related.
- All ESG and SAF expenditures must be for actual, necessary, and incurred expenses.
- Expenses must have been incurred during the time-frame of the grant (expenses incurred for December may be paid up to January 31st after the grant period ends).

Financial Management:

Financial Management Workbook

- Budget
- Revised Budget
- Draw Cover Form
- Draw Itemization Form

Workbooks are posted on IFA's website in the respective ESG and SAF sections under the Financial Management tabs:

<http://www.iowafinanceauthority.gov/Home/DocumentSubCategory/49> (for ESG)

<http://www.iowafinanceauthority.gov/Home/DocumentSubCategory/54> (for SAF)

Financial Management:

Financial Management Workbook:

Budget Revision Form



- At beginning of year—
 - Begin with the Revised Budget that should have been submitted with your 2018 signed contract page.
 - Revised Budgets should be based on the categories used in the Application request, revised to reflect the actual grant amount awarded
 - Should not introduce new budget categories not in the application
 - Projects may decide how to prioritize the award amount, within the budget categories used in the Application

<http://www.iowafinanceauthority.gov/File/DownloadFile/6742>

Financial Management:

Financial Management Workbook:

Budget Revision Form

- Later in year—
 - Projects may submit additional “Budget Revision” requests
 - These need to be submitted in advance of the draw request affected
 - Likely, but not guaranteed, approval
 - IFA must keep the overall budget within HUD guidelines; this is why we track budget categories and must review changes
 - Projects may not “over-draw” any budget category; for ESG, budget categories are tracked and reported separately to HUD, and drawn separately in HUD’s IDIS payment system (separate “accounts” for each)
- If the change is within a subcategory (example, changing from paying utilities for a shelter to paying for pest management for a shelter, a “Budget Revision” is not necessary—it is all part of Shelter Operations)

Financial Management:

Financial Management Workbook:

Draw Cover Form

- Submit with draw requests, as the “Cover Page” (Note – form must be signed and dated)
- Note new section on the ESG and SAF Draw Request Cover Forms with instructions to check either applicable month OR quarter (NOT both)

2018 Iowa Statewide Emergency Solutions Grant (FFY 2017 Funds) DRAW REQUEST COVER FORM

Agency: _____ DUNS #: _____ Contract #: _____

Contact for Draw: _____ Email & Phone: _____

Monthly Current Draw (check only ONE):	OR	Quarterly Current Draw (check only ONE):
____ JANUARY ____ MAY ____ SEPTEMBER		____ QUARTER 1 (JANUARY - MARCH)
____ FEBRUARY ____ JUNE ____ OCTOBER		____ QUARTER 2 (APRIL - JUNE)
____ MARCH ____ JULY ____ NOVEMBER		____ QUARTER 3 (JULY - SEPTEMBER)
____ APRIL ____ AUGUST ____ DECEMBER		____ QUARTER 4 (OCTOBER - DECEMBER)

Financial Management:

Financial Management Workbook:

Draw Cover Form

- Start with current “Approved Budget” – Column 1
- Make sure to include total of funds drawn to date under Column 2 “Previous Requests”
- Enter your “Current Request” in Column 3, and the “Balance Remaining” will calculate for Column 4. Do NOT override the calculation in Column 4 by manually entering an amount.
- Complete this for each budget category (if a category was not used for your project leave it blank)
- For ESG, these totals are what IFA will draw in each category in HUD’s IDIS payment system

Financial Management:

Financial Management Workbook:

Draw Itemization Form

- Submit the “Draw Itemization Form” with each draw request, after the “Draw Cover Form”
- Detail EACH expense separately on this form
- Must match order of expense documentation submitted
- One row = one item of expense documentation
- Amounts MUST match documentation (receipts, etc. to be submitted for each expense reimbursement requested)
- Portions of expenses
 - If less than 100% of an expense is requested for reimbursement, the Grantee MUST specify how the portion is calculated-HUD requirement

Financial Management:

Financial Management Workbook:

Expense Documentation

- Timesheets
 - Should include hours worked on ESG or SAF, for each staff member – ensure dates are included
 - Should be signed by staff member and supervisor (electronic timesheets okay also)
- Payroll reports
 - Link total hours worked (from timesheets) to total amount paid to staff - **clearly show all calculations to equal the total reimbursement requested**
- Receipts
 - Legible – Review any store receipts to ensure scanned properly
 - Itemized
 - Clearly indicate which items were paid with ESG or SAF funds
 - Date expenses were incurred—must be within the time frame of the draw

Financial Management: Submitting Draws

- Submit to IFA by mail, email, or fax (if fax or mail, make sure to note that it is for the Homeless Programs)
Attention: either [Judy Hartman](#) or [Carole Vipond](#)
- Draws include, in this order:
 - Draw Cover Form
 - Draw Itemization Form
 - Expense Documentation (i.e. receipts, payroll records)
 - Homeless Mgmt. Information System (HMIS or DVIMS) Data Report – also known as your Service Point report. **Draw will not be processed without this report.**

Financial Management: Submitting Draws--Timelines



- Submit draws at least quarterly
- May submit monthly – if so, submit each month separately – do NOT submit 2 months together or include multiple months that overlap calendar quarters
- Deadlines: last day of month following end of quarter – refer to Section 4.3 of your contract for deadlines (ex: ALL exp's for quarter ending March 31st are due no later than April 30th). Per the terms of your contract IFA may refuse to reimburse draws submitted late.
- Include all applicable expenses for that month or quarter.

Financial Management: SAF as Match for Other Grants

- NOTE - SAF is used by IFA as match for Iowa Statewide ESG program.
- SAF funds therefore are not be available to grantees to use as match for other federal grants.
- You are responsible to check the rules of your other grants

Financial Management: HUD Financial Management Curriculum

The screenshot shows a web browser window displaying the HUD Exchange website. The address bar shows the URL <https://www.hudexchange.info/training-events/fin>. The page header features the HUD Exchange logo, a search bar with the text "Search Resources" and a "GO" button, and navigation links: "Login to My HUD Exchange", "About", "Email Updates", and "Contact Us". Below the header, a navigation menu includes "Home", "Manage a Program", "News", "Training & Events" (which is underlined), "Get Assistance", and "About Grantees". The main content area is titled "Financial Management Curriculum" and includes a paragraph explaining the curriculum's purpose: "Completing the financial management curriculum will assist grantees and subrecipients to comply with federal grant requirements, increase effectiveness, and maximize efficiency. The first course, Financial Management 101, provides an introduction to key topics and financial management basics. Courses available next year will cover advanced topics in financial management." It also lists the recommended order of completion: 1. View the video, 2. View the Prezi, and 3. Take the online module. A link "View detailed instructions on how to use the Financial Management Curriculum" is provided. The Windows taskbar at the bottom shows various application icons and the system clock indicating 2:42 PM on 12/2/2014.

HUD Exchange

Search Resources GO

Advanced Search

Home | Manage a Program | News | Training & Events | Get Assistance | About Grantees

[Training & Events Main](#)

Financial Management Curriculum

Completing the financial management curriculum will assist grantees and subrecipients to comply with federal grant requirements, increase effectiveness, and maximize efficiency. The first course, Financial Management 101, provides an introduction to key topics and financial management basics. Courses available next year will cover advanced topics in financial management.

HUD recommends users complete the curriculum in the following order:

1. View the video
2. View the Prezi
3. Take the online module

[View detailed instructions on how to use the Financial Management Curriculum](#)

Financial Management: HUD Financial Management Curriculum (cont.)

The screenshot shows a web browser window with the URL <https://www.hudexchange.info/training-events/fin>. The browser tabs include "Microsoft Exchange - Outlook...", "Emergency Solutions Grant Pr...", "2014 HUD Median Income Lim...", and "Financial Management Curr...".

The page content is organized into three columns:

- Introduction to Financial Management Video**
A YouTube video player showing the title "Introduction to Financial Management Video". Below the player are links for [Transcript](#), [Get Credit](#), and [Feedback](#). The text below reads: "This video kicks off the Financial Management 101 course. It describes why financial management is an important component of running..."
- Good Financial Management: A Well-Oiled Machine Prezi**
A Prezi presentation player showing the title "Good Financial Management: A Well-Oiled Machine". Below the player are links for [Transcript](#), [Get Credit](#), and [Feedback](#). The text below reads: "This prezi introduces the core concepts of financial management and visually shows the connections between topics. It provides an overview of how the pieces of..."
- Get in Gear: Core Components of Sound Financial Management**
A module page titled "Get in Gear: Core Components of Sound Financial Management". It includes a "Welcome to" message and a description: "This online, self-paced module provides an overview of financial management core topics: Audits, Budgeting, Federal Cost Principles..."

The Windows taskbar at the bottom shows the time as 2:43 PM on 12/2/2014.

Financial Management: Please Note - Section 9.2 of the Contracts lists the Audit Requirements

The next 3 slides provide a detail description of a Compilation, a Review and an Audit

- An Audit completed by a licensed CPA provides the highest level of assurance on the financial statements and is preferred
- A Review provides a lower level of assurance, but is also acceptable. It too must be completed by a licensed CPA.
- A Compilation is a financial statement that provides "no assurance" and is **not sufficient for SAF or ESG!**

Financial Management: Please Note - Section 9.2 of the Contracts lists the Audit Requirements

A “Compilation” Financial Statements: Compiled

Compiled Financial Statements:

- Most basic level of service CPAs provide with respect to financial statements.
- CPA must comply with certain basic requirements of professional standards, such as having a knowledge of the client's industry and applicable accounting principles, having a clear understanding with the client as to the services to be provided, and reading the financial statements to determine whether there are any obvious departures from generally accepted accounting principles (or, in some cases, another comprehensive basis of accounting).
- Upon completion, a report on the financial statements is issued that states a compilation was performed in accordance with AICPA professional standards, but no assurance is expressed that the statements are in conformity with generally accepted accounting principles. This is known as the expression of "no assurance."

Not sufficient for SAF or ESG!

Financial Management: “A Review”

Financial Statements: Reviewed



Reviewed Financial Statements:

- Inquiry and analytical procedures in addition to the procedures for a compilation.
- Upon completion, a report is issued stating that a review has been performed in accordance with AICPA professional standards, that a review is less in scope than an audit, and that the CPA did not become aware of any material modifications that should be made in order for the statements to be in conformity with generally accepted accounting principles, or if applicable, another comprehensive basis of accounting.
- This is known as the expression of "limited assurance."

May be sufficient for SAF or ESG, IF:

- **Performed by a Certified Public Accountant (CPA) AND**
- **The CPA is independent from the agency—e.g., not a board member**

Financial Management:

An “Audit” Financial Statements: Audit



Audited Financial Statements:

- The highest level of assurance services.
- All of the steps for compiled or reviewed statements
- Also verification and substantiation—such as direct correspondence with creditors or debtors to verify details of amounts owed, physical inspection of inventories or investments, inspection of minutes and contracts, etc.
- CPA also gains an understanding of the system of internal control.
- When complete, the CPA's standard audit report states that an audit was performed in accordance with generally accepted auditing standards, and expresses an opinion that the financial statements present fairly the entity's financial position and results of operations.
- This is known as the expression of "positive assurance."

The best financial reports for ESG or SAF, but more expensive!

Audits are submitted with the grant applications, but an updated version may need to be submitted at a later date if it was not available at the time of the application

Data Collection & Reporting

Data Collection & Reporting

Data Reporting to HUD



- Consolidated Annual Performance Evaluation Report (CAPER)
 - Based on the Five-Year Consolidated Plan and Annual Action Plans
 - IFA submits to HUD
- New HUD SAGE reporting system for ESG subgrantees:
 - Agencies download report from HMIS/DVIMS then enter into SAGE
 - **More information coming soon**



ESG/SAF DATA COLLECTION & REPORTING

GARY WICKERING – IOWA HMIS PROJECT
MANAGER

Training Topics

- ServicePoint Trainings
- Data Quality Reports
- Annual ESG CAPER
- Contact Information
- Question?

ServicePoint Training

- Data collection in HMIS (or comparable DV database) is required for all ESG/SAF grantees, excluding victim service providers.
- All HMIS/DVIMS system users must undergo training to receive licensed access to the system.
 - If you are a new ESG/SAF project and have not yet been trained on the use of ServicePoint, contact the shawn.mcaninch@icalliances.org to schedule training.
 - At the end of training all new users will sign all necessary user agreements regarding data collection and system security.
- Refresher training can be arranged for any interested agencies/programs.

Required Contract Forms

- User Ethics and Responsibility Agreement
 - Each line must be reviewed and initialed
 - One form for each licensed system user.
 - Agency Director must sign.
- ICA/Agency Memorandum of Understanding
 - Were mailed to current agencies October 26th for execution by November 9th. If your agency is new to the network, ICA will provide the MOU as soon as agency staff are trained.

Data Quality Reporting

- The ESG/SAF data quality report is available in ServicePoint for grantees to run as often as they prefer to monitor their data quality.
- Reports are submitted quarterly to Iowa Finance Authority (or customary draw frequency) with draw requests.
- Reports with 5% or greater “NULL” (missing) values or data entry delays of greater than 14 days will be held by IFA until ICA staff follows up with the offending agency with corrective action.
- ICA will continue to work with IFA to develop data quality efforts to assist in the end of year reporting to HUD.

Annual ESG CAPER (Sage)

- All sub-grantees will run their own ESG CAPER report this year, an [ESG guide](#) is available and has been placed in the system news in both HMIS and DVIMS.
- By the end of January, projects should run the ESG CAPER report for the 2017 calendar year and correct all data issues.
 - All ES projects to enter approx. start date of homelessness for all clients, if one was not collected for any reason then the entry date must be used.
 - RRH clients must have a blank move-in date at entry to be counted.
 - RRH clients exited to permanent destinations must have a move-in date completed through the interim review or exit process.
 - HP clients must have Section 1B Housing Assessment completed at exit.
- You will receive an upload link for your CAPER file from the Sage system that ICA will generate.
- IFA will monitor submission via the Sage system and will submit the final report.

Contact Information

- Julie Eberbach - Associate Director - ICA
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- Gary Wickering – Iowa HMIS Project Manager
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- David Nelson – Iowa HMIS System Administrator, Reporting
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- Patrick Schacherer – Iowa HMIS System Administrator, Program and Policy
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- Allison Larson – Iowa HMIS System Administrator, Sioux City
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Questions?





Thank you for attending ESG/SAF grant training today!

If you are a SAF grantee, you are free to leave now (but also welcome to stay).

If you are an ESG grantee, please stay for the following session.

If you have traveled here today from out of town and would like partial reimbursement for travel expenses:

- *SAF grantees: Travel expenses are eligible through SAF grant; submit with regular draw.*
- *ESG grantees: Please pick up a form on the Resource table and see Judy Hartman if you have questions.*

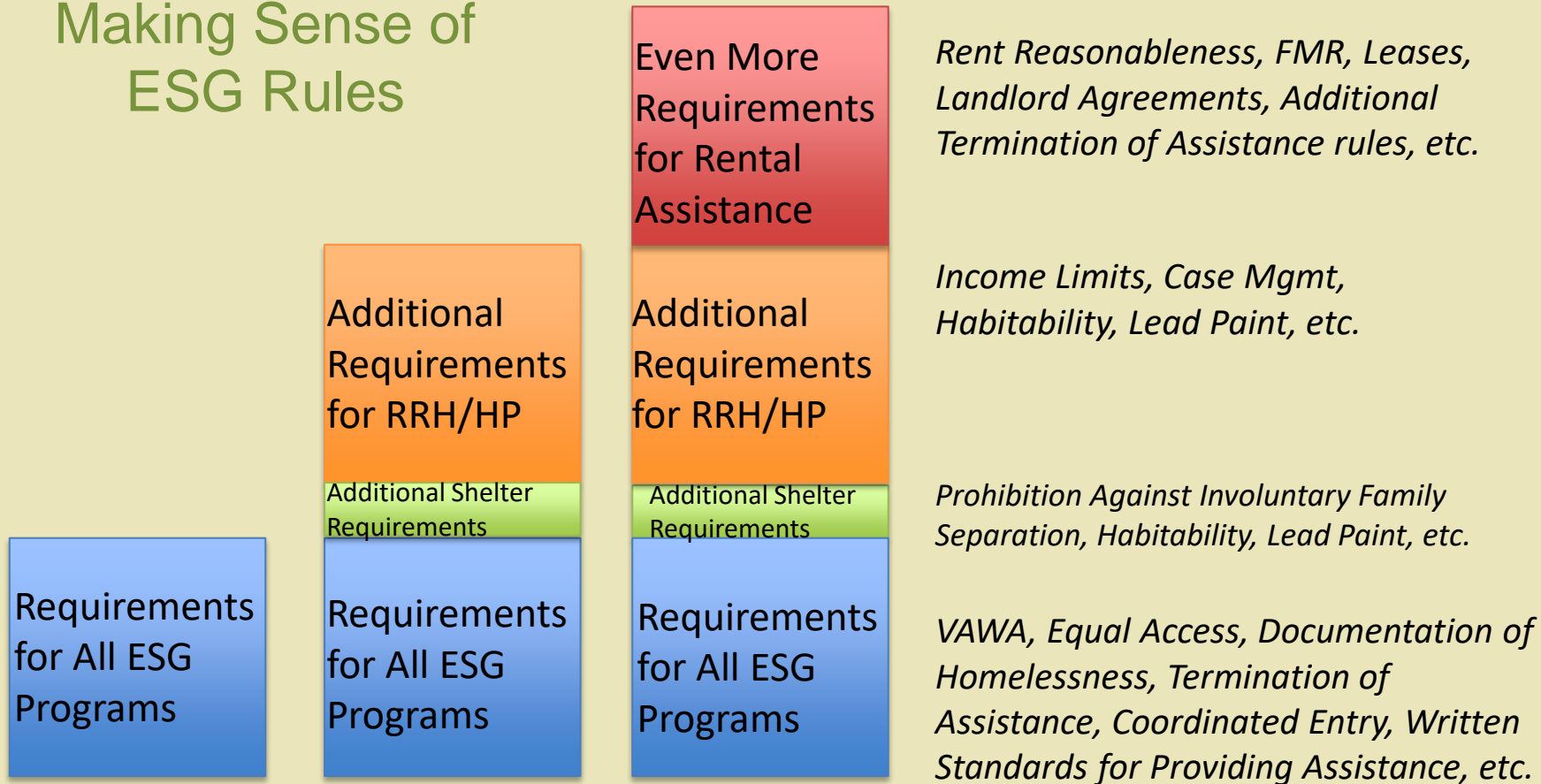


ESG

Selected Topics



ESG Selected Topics: Making Sense of ESG Rules



ESG Selected Topics:

Requirements for All Programs:

Violence Against Women Act (VAWA)*

- VAWA is intended to encourage survivors who are receiving housing subsidies to report and seek help for the abuse committed against them, without being afraid of being evicted.
- VAWA protects individuals applying for or living in federally assisted housing from being discriminated against because of **acts of domestic violence**, **sexual assault**, **dating violence**, and **stalking** (VAWA crimes) committed against them.
- Applies regardless of age, sex, gender, identity, or sexual orientation.
- In November 2016, HUD published VAWA Final Rule implementing the requirements of VAWA 2013 through HUD regulations.

This and following slides adapted from: National Housing Law Project, HUD Final Rule Implementing VAWA 2013 Webinar; and 2017 HUD HOPWA Institute VAWA Spotlight.

ESG Selected Topics:

Requirements for All Programs: VAWA Poll

Which program is NOT covered by HUD's VAWA rule?

- Project-based Section 8
- Tenant-based Section 8 (Housing Choice Voucher)
- Housing Trust Fund
- Emergency Solutions Grant
- Continuum of Care Program
- Low Income Housing Tax Credit program
- HOME Program
- Housing Opportunities for Persons with AIDS
- Rural Development Multi-Family (Dept of Agriculture)

ESG Selected Topics: Requirements for All Programs: VAWA Poll

All are Covered by VAWA

ESG Selected Topics:

Requirements for All Programs: VAWA Core Protections

May not deny an applicant assistance or terminate assistance **on the basis or as a direct result of** an applicant having been a survivor of domestic violence, dating violence, sexual assault, or stalking.

- Adverse factors resulting from the abuse (e.g. poor credit history or criminal history)

ESG Selected Topics: VAWA Additional Protections for Rental Assistance

- Notice of VAWA Occupancy Rights
- Lease Addendums (additions) & Lease Bifurcations (splitting leases)
- Emergency Transfer Plans

ESG Selected Topics:

VAWA Additional Protections for Rental Assistance

HUD Notice of Occupancy Rights

- New HUD Notice of VAWA Occupancy Rights
 - Summarizes VAWA housing rights
 - Housing providers customize the form for their own agency's info

ESG Selected Topics:

VAWA Additional Protections for Rental Assistance HUD Notice & Self-Certification Form

Housing provider must provide HUD notice and self-certification form to applicants and tenants:

1. At the time an applicant is denied admission or assistance;
2. At the time individual is admitted or given assistance (or for existing tenants, at recertification or lease renewal, or sooner if not imminent); and
3. With any notification of eviction or termination of assistance.

ESG Selected Topics:

VAWA Additional Protections for Rental Assistance: Proving Abuse

- Housing provider is free to take tenant at their word, or can ask tenant to prove VAWA crime.
- Any request by housing provider for proof must be made **in writing**.
- Tenant has **14 business days** from the request to provide proof.
- Housing provider is free to grant extension if tenant needs more time.

ESG Selected Topics:

VAWA Additional Protections for Rental Assistance: Proving Abuse (Documentation)

- 1) New HUD VAWA Self-certification Form: 10 questions and brief description OR
- 2) Police, court or administrative record OR
- 3) Statement from third party (victim service provider, medical professional, mental health professional or attorney, signed by both third party and survivor) OR
- 4) Statement or other evidence (housing provider's discretion)

ESG Selected Topics:

VAWA Additional Protections for Rental Assistance: Proving Abuse (Documentation, continued)

- Survivor gets to choose documentation option; housing providers must accept.
- Only exception – when there is conflicting evidence, housing providers can ask for third-party documentation.
- Housing providers cannot judge the merits of claims of VAWA crimes.

ESG Selected Topics:

VAWA Additional Protections for Rental Assistance: Evictions

- Housing programs and landlords may not evict a tenant **on the basis or as a direct result of** their status as a survivor.
- An incident of actual or threatened abuse does not constitute a “serious or repeated lease violation” or “good cause” for evicting the survivor or terminating assistance.

ESG Selected Topics:

VAWA Additional Protections for Rental Assistance: Evictions Limitation

- Housing providers can still evict or terminate assistance if they can demonstrate an “actual and imminent threat” to other tenants or employees at the property if the survivor is not evicted.
- “Actual and imminent threat” consists of a physical danger that is real, would occur within an immediate timeframe, and could result in death or serious bodily harm.
- Must subject survivor to the same standard as other tenants (i.e., cannot impose more demanding standard on survivor)

ESG Selected Topics: VAWA Additional Protections for Rental Assistance: Lease Bifurcation

- Housing provider may bifurcate (split) a lease to evict an abuser while allowing the survivor to stay.
- Must follow federal, state, and local law in evicting the abuser.

ESG Selected Topics:

VAWA Additional Protections for Rental Assistance: Lease Addendum (addition)

ESG grantee agencies must ensure that the owner or landlord adds a VAWA lease term/addendum (addition) for all ESG-assisted units, and is aware of the option to bifurcate (split) a lease or terminate assistance to a household member for perpetrating VAWA crime.

The VAWA lease term/addendum **must**:

- Provide for termination of lease without penalty for emergency transfer;
- Incorporate the prohibited basis for termination of assistance or eviction;
- Include the limitations of VAWA protections; and
- Include confidentiality requirements.

ESG Selected Topics:

VAWA Additional Protections for Rental Assistance: Emergency Transfer Plans

- ESG subgrantees are responsible for developing an emergency transfer plan (start with HUD model/template).
- For survivors of VAWA crimes:
 - That request a transfer AND
 - Reasonably believe threat of further violence if same unit.

ESG Selected Topics:

VAWA Additional Protections for Rental Assistance: Four Forms

Model forms, customized by agency:

https://www.hud.gov/program_offices/administration/hudclips/forms/hud5a

VAWA Appendix A: **Notice of
Occupancy Rights** Under the Violence
Against Women Act, form HUD-5380

VAWA Appendix B: **Model Emergency
Transfer Plan** for Victims of Domestic
Violence, Dating Violence, Sexual
Assault, or Stalking, form HUD-5381

VAWA Appendix C: **Certification** of
Domestic Violence, Dating Violence,
Sexual Assault, or Stalking, form HUD-
5382

VAWA Appendix D: **Emergency
Transfer Request** for Victims of
Domestic Violence, Dating Violence,
Sexual Assault, or Stalking, HUD-5383

ESG Selected Topics:

Requirements for All Programs:

VAWA Confidentiality

Any information submitted to an ESG subgrantee or landlord, including the fact that an individual is a victim of one of the four crimes, **must** be kept confidential:

- Employee access only as required;
- Not disclosed to third parties except:
 - With time-limited client written release;
 - Required for use in eviction or termination hearing;
 - Otherwise required by law.
- Kept for five years like all required ESG records.

ESG Selected Topics:

Requirements for All Programs:

Equal Access, Sexual Orientation & Gender Identity

- Rules from 2012 and 2016
- <https://www.hudexchange.info/resource/1991/equal-access-to-housing-final-rule/>
- Sexual Orientation and Gender Identity
 - Individuals must be served according to their gender identity

ESG Selected Topics:

Requirements for Selected Programs, Family Shelters Equal Access



- Family Programs Serving Children
 - Note Equal Access rules.
 - If programs serve any families with children, they must serve all family types. For example, not allowed to only serve women and children.
 - As of October 2016.
 - HUD Continuum of Care FAQ 1529, July 2014:
<https://www.hudexchange.info/faqs/1529/how-is-the-definition-of-family-that-was-included/>
- Questions? One option: HUD Ask-A-Question Help Desk:
<https://www.hudexchange.info/program-support/my-question/>

What is Rapid Rehousing

National Alliance to End Homelessness:

<https://www.youtube.com/watch?v=frWexyi6qAk>

(3:05)

- Focus of program nationally and in Iowa is on Rapid Rehousing rather than Homelessness Prevention
- One goal of Coordinated Services Regions: Develop a baseline of services, including at least Emergency Shelter and Rapid Rehousing



ESG Selected Topics: Rapid Rehousing (RRH)

Successful RRH programs:

- Housing First approach—permanent housing FAST
- Accessible to households experiencing homelessness—Coordinated Entry, shelters, food pantries, etc.
- Assistance guided by housing plan and assessment of housing barriers, strengths, and preferences
- Flexibility of assistance—not one-size-fits-all

Iowa Coordinated Services Goal 5: Baseline of services in all regions that includes Emergency Shelter & Rapid Rehousing

ESG Selected Topics: Rapid Rehousing (RRH)

Challenges:

- Landlord recruitment
- Background checks screen out clients
- High-need/high-barrier clients
- High rents; FMR doesn't keep up
- High case-load for case managers
- Not enough \$\$

Quiz

Which HUD Homeless Categories qualify someone for ESG Rapid Rehousing?

- Category 1: Literally Homeless
- Category 2: Imminent Risk
- Category 3: Homeless Under Other Federal Statutes
- Category 4: Fleeing Domestic Violence

Answer

Category 1: Literally Homeless
(car, unsheltered, emergency shelter, etc.)

ESG is different from Continuum of Care Program here!
CoC Program Allows all Four

ESG Selected Topics:

Additional Requirements for RRH/HP: Income Eligibility

- Review form, “ESG HP-RRH Income Eligibility Worksheet” under RRH/HP section at <http://www.iowafinanceauthority.gov/Home/DocumentSubCategory/49>.
- Note difference in HP and RRH income requirements
- Note income exclusions—such as income of minor children



ESG Selected Topics:

Additional Requirements for RRH/HP:

Income Eligibility (continued)

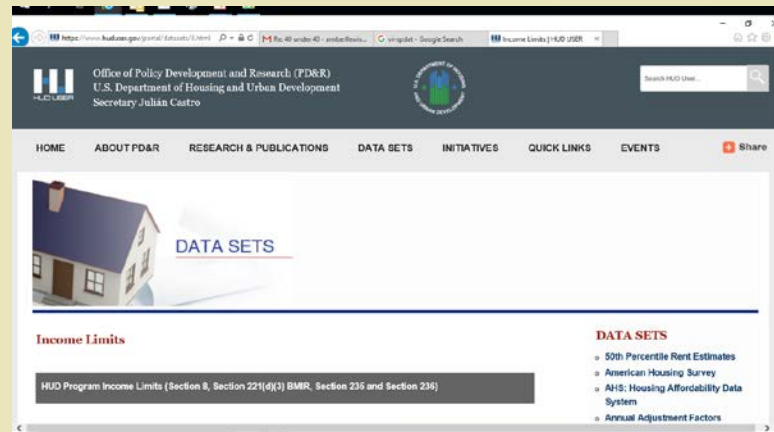
- Income requirements
 - Documenting Area Median Income
 - Third-party verification of income: obtain client release to contact employer if necessary
 - Self-declaration of income
 - Zero-income affidavit
 - Certification/recertification

ESG Selected Topics:

Additional Requirements for RRH/HP:

Income Eligibility (continued)

- Use the most current HUD limits
- <https://www.huduser.gov/portal/datasets/il.html>



ESG Selected Topics:

Additional Requirements for RRH/HP: Habitability Inspection

- Review form, “ESG HP-RRH Habitability Checklist” under RRH/HP section at <http://www.iowafinanceauthority.gov/Home/DocumentSubCategory/49>.
- Visual habitability inspection required
 - Don’t have to be HUD-certified
 - Different from Housing Quality Standards (for Section 8 and similar programs)
 - HQS more stringent in most areas (exception of fire safety)

ESG Selected Topics:

Additional Requirements for RRH/HP:

Lead-Based Paint

- Review form, “ESG HP-RRH Lead Paint Visual Screening Form” under RRH/HP section at <http://www.iowafinanceauthority.gov/Home/DocumentSubCategory/49>.
- Lead-based paint inspection required
 - Only if unit built before 1978 AND
 - Child under six or pregnant woman will live there
 - Some other exceptions (such as SRO)
 - Take short online training to become certified visual inspector



ESG Selected Topics:

Even More Requirements for Rental Assistance: Fair Market Rent & Rent Reasonableness

Review form, “ESG HP-RRH Rent Reasonableness and Fair Market Rent” under RRH/HP section at <http://www.iowafinanceauthority.gov/Home/DocumentSubCategory/49>.

- Fair Market Rent (FMR) Required for Rental Assistance
- Rent Reasonableness ALSO Required for Rental Assistance

Not required if only providing other types of HP/RRH assistance (utility assistance, legal services, case mgmt, etc.)

ESG Selected Topics:

Even More Requirements for Rental Assistance: Fair Market Rent

- Use most current HUD data: <https://www.huduser.gov/portal/datasets/fmr.html>
- Document the applicable county FMR in the client file
- Obtain the county utility allowance chart from your local PHA
- HUD FMRs include the utility allowance already! *Must* include utility with the rent when comparing the unit total rent with FMR!!



ESG Selected Topics:

Even More Requirements for Rental Assistance: Fair Market Rent (continued)

Example 1:

- HUD FMR is \$680
- Unit rent is \$620, utilities not included
- Utility allowance sheet for your county shows utility allowances total \$70

Is this unit eligible?

ESG Selected Topics:

Even More Requirements for Rental Assistance: Fair Market Rent (continued)

Example 1 Continued

Answer: NO!

- Total unit rent is \$690 (\$620 + \$70)
- This is higher than FMR. Unit is NOT ELIGIBLE

Can client pay the \$10 difference? NO!

Can agency pay the difference from another funding source? NO!

What to do? Maybe landlord will negotiate a lower rent???

ESG Selected Topics:

Even More Requirements for Rental Assistance: Rent Reasonableness

- Required for all HP & RRH Rental Assistance:
 - Rent Reasonableness (in addition to FMR)
 - Find three comparable units
 - Try IowaHousingSearch.org to locate “comparables”
<http://www.iowahousingsearch.org/>
 - Match up as many important characteristics as possible;
make sure to add utility allowance as applicable

Iowa ESG: average of three comparables must not be more than 10% above the proposed unit rent

ESG Selected Topics:

Even More Requirements for Rental Assistance: Landlord Agreements and Leases

- Review form, “ESG HP-RRH Rental Assistance Agreement” under RRH/HP section at <http://www.iowafinanceauthority.gov/Home/DocumentSubCategory/49>.
- Required for all HP & RRH Rental Assistance:
 - Landlord agreements—written
 - Leases—written (exception only for arrears, can be verbal agreement)
 - Not the same thing!
 - Landlord agreements are between the landlord and agency; leases between the client and landlord
 - Landlord agreements must contain some key information—including that the landlord must notify the agency of any eviction action against the client

ESG Selected Topics:

One Final Financial Mgmt Topic: Match

- HUD requires 1:1 match (100%)
- IFA supplies 25% of the match through SAF
- Grantees required to supply matching contributions of 75% of grant
- Source of match:
 - Send in documentation at the beginning of the year
 - Send in copy of contract, such as United Way, CVAD, etc.
 - Copy of assessed value of the building (for a shelter, for example); track how much is dedicated each year to match (can't use forever)
 - Printout of donations
 - Contributions must be made during time period of the grant
- During grant year, document use of match funds
 - Document total dollar amount used on your Draw Cover Form
 - Retain documentation at your agency for how it was used
 - Use of match contributions must follow HUD ESG rules
- IFA may hold draws if not current on match
- **IFA required to report match details to HUD each year**



IFA Contacts

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- ESG financial management, draws, questions

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- SAF financial management, draws, contracts

Amber Lewis, Amber.lewis@iowa.gov, (515) 725-2209

- Other program management, questions

Laura Abbott, Laura.abbott@iowa.gov, (515) 725-4875

- ESG monitoring visits