

State of Oklahoma Emergency Solutions Grant (ESG)

Implementation Manual

Effective October 1, 2026

OKLAHOMA Commerce

Purpose of Implementation Manual

The purpose of this Implementation Manual is to provide a Quick Guide or summary of the Emergency Solutions Grant (ESG) Federal Regulations and provide guidance for State requirements that are stricter than the Federal Policies.

Before starting each application in the Oklahoma Grants Exchange (OGX), the applicant agrees to follow all requirements as prescribed by the Oklahoma Department of Commerce (ODOC), including but not limited to the ODOC State Consolidated Plan, ESG Application, ESG Contract, and ESG Implementation Manual.

Please be aware that new guidance is continually released. It is the responsibility of the subrecipient to keep up with all new guidance and regulations released by the U.S. Department of Housing and Urban Development (HUD) and ODOC. New guidance or regulations do not have to be added to the above listed documents before the subrecipient is responsible for implementation of the new guidance and/or regulations.

Most Code of Federal Regulations (CFR) links contained in this document are to the Cornell Law School's Legal Information Institute (LII) Electronic Code of Federal Regulations (e-CFR).

Governing Authority

This Implementation Manual is governed by applicable federal statutes, federal regulations including 24 CFR Part 576, binding federal award conditions, applicable Oklahoma statutes, and this Manual. In the event of conflict, the following order of precedence applies: (1) Federal statute; (2) Federal regulations; (3) Binding federal award conditions; (4) State statute; (5) Implementation Manual; (6) Request for Applications; (7) Award Letter; (8) Subrecipient internal policies or procedures. No subordinate document shall supersede a superior authority.

Disclaimer of Liability

All funding is contingent upon continued federal and State authorization and availability. ODOC makes no representation or warranty that funding levels, federal requirements, or program conditions will remain unchanged. ODOC shall not be liable for costs incurred in reliance upon anticipated funding, draft materials, informal communications, or preliminary guidance. Compliance obligations arise from federal law and binding award conditions and are not limited to the express text of this Implementation Manual.

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Background

The Emergency Solutions Grant (ESG) Program is authorized under the McKinney-Vento Homeless Assistance Act, as amended by the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009.The HEARTH Act, signed into law on May 20, 2009, amended and reauthorized the McKinney-Vento Homeless Assistance Act and made substantial changes to HUD's homeless assistance programs, including increased resources for Homelessness Prevention (HP) and an increased emphasis on performance.

The ESG Program is governed by the ESG Program Interim Rule at 24 CFR Part 576. The Interim Rule was originally published on December 5, 2011, became effective January 4, 2012, and has subsequently been updated. Subrecipients must comply with the current requirements of 24 CFR Part 576 and other applicable federal, state, and ODOC requirements.

Procedures

1. Purpose. The ESG program is a component of the State of Oklahoma's efforts to address homelessness. In coordination with other state and local resources, the ESG program assists individuals and families experiencing, or, at-risk of homelessness by supporting activities that prevent homelessness, help individuals and families quickly regain permanent housing, and promote housing stability.
2. Eligible Applicants. Eligible ESG applicants must fall into one of the following categories:
    a. Returning ODOC ESG Recipients. Private nonprofit organizations that have an annual audit and have received ODOC ESG funding within the previous two grant cycles may apply directly to ODOC without a sponsor.
    b. First-Time ODOC ESG Applicants with an Annual Independent Audit. Private nonprofit organizations applying for ODOC ESG funding for the first time that have an annual independent audit must apply through an eligible sponsor. After completing the first funded program year, the organization may request approval from ODOC to apply independently if:
    c. Its annual audit contains no major findings; and
    d. Its ODOC ESG monitoring contains no major findings.
    e. Applicants Requiring Sponsorship. Private nonprofit organizations that do not have an annual independent audit and/or have not received ODOC ESG funding within the previous two grant cycles must apply through an eligible sponsor.
3. ESG Sponsorship. ESG sponsorship is an arrangement in which an eligible organization applies for and administers ODOC ESG funding on behalf of a sponsored nonprofit organization. The sponsor is the entity that enters the ESG contract with ODOC and is responsible for ensuring that the sponsored organization complies with applicable ESG program, financial, reporting, and federal requirements. The sponsored organization carries out the ESG activities approved in the application and submits documentation of eligible expenses to the sponsor for reimbursement. The sponsor reviews the submitted documentation for eligibility, accuracy, and completeness and submits the reimbursement claim to ODOC. Upon receipt of reimbursement from ODOC, the sponsor reimburses the sponsored organization for the approved ESG expenses. The ESG sponsor is responsible for

oversight of the sponsored organization's ESG financial reporting, supporting documentation and match requirements. In addition, the sponsor shall provide technical assistance, monitoring, and administrative oversight designed to strengthen the financial management, internal controls, and program compliance capacity of the sponsored nonprofit. This capacity-building function is intended to prepare the agency to apply for and administer ODOC ESG funding independently. Eligible ESG sponsors must be:

a. A Unit of General Local Government (UGLG);
b. A Community Action Agency (CAA) serving the jurisdiction in which the sponsored organization will provide ESG-funded services, or
c. A private nonprofit organization with demonstrated experience administering federal funds or serving as an umbrella organization such as a local United way or the nonprofit arm of a housing authority.
    i. Sponsor Administration of ESG Activities. A sponsor may directly administer a portion of the ESG award directly to provide eligible Homelessness Prevention (HP) and Rapid Re-Housing (RRH) activities, when approved through the CoC funding process and reflected in the ESG application and approved budget. A sponsor may also retain ESG administrative funds for eligible administrative activities, subject to ODOC's 3.75% administrative cap.
    ii. Sponsor / Shelter Agreement. The sponsor and sponsored emergency shelter must execute an Emergency Solutions Grant Sponsor and Shelter Agreement prior to the release of ESG funds. The agreement establishes the responsibilities of both parties, including project implementation, reimbursement, documentation, match, recordkeeping, and compliance with applicable ESG requirements. The Sponsor/Shelter Agreement must be signed by authorized representatives of both the sponsor and the sponsored emergency shelter and submitted to ODOC as required.

Local Government Project Approval

CAAs and private nonprofit organizations proposing ESG-funded emergency shelter activities must obtain approval from the UGLG in which the proposed activities will be located. If ESG-funded emergency shelter activities will be provided in more than one jurisdiction, the applicant must obtain approval from each applicable UGLG.

Applicants must document the required approvals by submitting the Certification of Local Government Approval for Nonprofit Organizations with the ESG application. A separate certification must be completed and signed by the Chief Elected Official of the applicable UGLG.

General ESG Program Requirements

ESG funds may be used only for eligible activities and program participants in accordance with 24 CFR Part 576 and ODOC ESG requirements. ESG funds may not be used to provide homelessness prevention or housing assistance to homeowners.

Program participants must meet the applicable HUD definition of homelessness or at risk of homelessness, based on the ESG component and assistance being provided.

ODOC's ESG subrecipients must:

- Actively participate in the CoC serving the area in which ESG funded services are provided.
- Participate in the applicable CoC's Coordinated Entry process, as required.

- Participate in the applicable CoC's Homeless Management Information System (HMIS). Victim service providers (VSP) must use a comparable database that meets applicable HUD requirements and can produce required reports for submission through SAGE.
- Participate in the applicable CoC's Point-in-Time (PIT) Count.
- Provide the required 100 percent match for ESG funds, unless otherwise exempt under applicable ESG requirements.
- Maintain an active registration in the federal System for Award Management (SAM.gov).
- Use ODOC ESG funds only to serve eligible program participants within Oklahoma's State ESG service area, excluding the ESG entitlement jurisdictions of the City of Oklahoma City and the City of Tulsa.
- Provide at least one individual to serve as an ESG application reviewer. Reviewers should be familiar with ESG requirements when possible; however prior ESG experience is not required. Reviewers will not be assigned to review applications submitted by organizations within their own CoC.

Threshold Requirements for ESG

All ESG Applicants must meet the threshold requirements identified below. Failure to meet a threshold requirement may result in the application being determined ineligible for funding. ESG Applicants must:

- Have an emergency shelter component or an established partnership that provides access to emergency shelter services. Emergency shelter access must be available 24 hours a day, seven days a week, 365 days a year, including through an approved hotel/motel arrangement when applicable.
- Demonstrate active participation in the applicable CoC and coordination of service efforts.
- Participate in the applicable CoC's Coordinated Entry process.
- Participate in the applicable HMIS or, for VSPs, an appropriate comparable database.
- Resolve outstanding ODOC monitoring problems (returning applicants), audit findings, and unresolved financial or program compliance issues from previously awarded grants, as required by ODOC.
- Submit all required certifications with the appropriate authorized signatures.
- Expend 100 percent of previously awarded ESG funds prior to accessing funds under a new ESG award. This includes ESG matching funds.
- Maintain the written policies and procedures required by ODOC ESG requirements. Required policies and procedures are addressed in Requirement 708 and other applicable sections of this Manual.
- Maintain an active SAM.gov registration and remain eligible to receive federal financial assistance.

ESG Program Design

The ODOC ESG Program is designed to address the following priority areas:

- Identification and prioritization of community needs;
- Successful movement of program participants toward self-sufficiency;
- Active participation and coordination within the CoC; and

- Performance measurement, evaluation and reporting

Performance Measures

ODOC ESG subrecipients must establish performance measures during the application process and use those measures to evaluate program performance and outcomes for the program participants they serve.

Subrecipients may establish local performance measures that reflect their organizational goals and local CoC priorities, however, each subrecipient must select and track at least two (2) of the four (4) State Performance Measures identified below. VSPs must collect and track the applicable performance data in a comparable database.

Performance measure progress will be reviewed during monitoring. Final results must be reported to ODOC as part of the ESG closeout process.

1. State Performance Measures. Each subrecipient must track at least two (2) of the following four (4) State Performance Measures:
    a. Number of persons exiting ESG programs, other than Homelessness Prevention, to permanent housing. (HMIS CAPER 23C Permanent Destinations Subtotal.)
    b. Number of persons in Homelessness Prevention exiting to permanent housing. (HMIS CAPER 24, Homelessness Prevention Housing Assessment at Exit. (Add first six rows of the TOTAL column.)
    c. Total number of persons served. (HMIS CAPER 5A, Total Number of Persons Served, Count of Clients column.)
    d. Total number of persons with income at exit or at the end of the grant year. (HMIS CAPER 16. Add the applicable income categories beginning with $1-150 through row-$2001+, in the Income at Latest Annual Assessment for Stayers and Income at Exit for Leavers columns.)
2. Establishing and Tracking Performance Measures. Performance measure goals are established by the applicant during the ESG application process. Local performance measures may differ from the State Performance Measures; however, at least two of the four State Performance Measures must be tracked. When an applicant establishes local performance measures that differ from the State Performance Measures, the application must explain how achievement of the local measures will contribute to the State's performance goals.
3. Each Performance Measure Must:
    a. Clearly identify the performance indication;
    b. Establish a measurable performance target and a plan for achieving the target;
    c. Measure performance quantitatively using numbers, percentages, or other appropriate data;
    d. Report progress to ODOC during monitoring and at grant closeout; and
    e. Identify unmet targets and actions to improve future performance.
    f. Performance measures must be tracked for a twelve-month period, preferably corresponding with the ESG contract period of October 1 through September 30.
    g. Compliance with performance measurement requirements will be reviewed during monitoring. Year-to-date information will be requested. Final performance measure results must be reported with the ESG Closeout. Subrecipients must identify

performance targets that were not met and describe actions that will be taken to improve future performance.

h. Subrecipients should use PIT Count data, HMIS or comparable database data (for VSPs), as applicable to support performance measurement and evaluation.

4. Performance Measure Definitions
    a. Performance Indicator: A measure used to evaluate program performance. Performance indicators may include:
    b. Output: What a program or system does or produces, such as the number of persons served, cost per household or length of stay.
    c. Outcome: A change or result associated with program activities, such as housing destination, returns to homelessness or changes in income.
    d. Performance Target: A percentage or numeric goal established for a performance indicator.

Distribution of ESG Funds to Rural Continua of Care

ODOC uses the established CoC structure to assist in determining the distribution of ESG funds throughout the State's non-entitlement areas. Each eligible CoC receives a base allocation of $150,000, with the remaining funds distributed according to the allocation formula below.

A base allocation of $60,000 is reserved for proposed ESG activities outside of the City of Tulsa's entitlement area but within Tulsa County. If no eligible applications are received for these areas, the proposed $60,000 is included in the funds available for distribution through the statewide allocation formula. The remaining ESG funds are allocated using the following factors:

- 10% - ACS 2023 Estimated Total State Population.
- 30% - Weighted Median Income Measure.
- 30% - ACS 2023 Quintile Tiering Based on Unemployment Rate.
- 30% - 2019 -2023 Housing units experiencing severe overcrowding (1.5 occupants per room).

In accordance with the timetable established in the ESG Request for Applications (RFA), applications will be assigned to reviewers outside the applicant's CoC for scoring. Upon completion of the review process, the application scores and rankings will be provided to the applicable CoC for use in developing its funding recommendations. Each CoC will then submit its funding recommendations to ODOC.

ODOC will review the recommended applications for compliance with applicable ESG and ODOC threshold requirements. Applications meeting the applicable requirements will proceed through ODOC's verification and award determination process.

CoC lead agencies must provide demographic and organizational capacity information for their respective service areas, as required by ODOC. Documentation may also be required to demonstrate the capacity and prior experience necessary to administer programs or activities comparable to the ESG activities proposed.

Following ODOC's review and approval of the CoC funding recommendations, ODOC will enter into contractual agreements directly with the approved subrecipients, upon receiving a signed ESG agreement from HUD. Each contract will identify the applicable funding source and funding year, award amount, period of performance, and applicable terms and conditions.

Each CoC must establish policies and procedures governing its local ESG funding process, including recommendations regarding funding amounts and the distribution of funds among

eligible ESG activities, provided those policies and procedures are consistent with applicable ESG and ODOC requirements.

Eligible Program Participants

Eligibility for ESG-funded assistance and services is determined by the ESG component under which assistance is provided and the applicable requirements of 24 CFR Part 576. Subrecipients must document program participant eligibility in accordance with applicable HUD and ODOC requirements.

1. Street Outreach and Emergency Shelter. Program participants must meet the applicable HUD homeless eligibility requirements. The 30 percent Area Median Income (AMI) limitation does not apply to eligibility for Street Outreach or Emergency Shelter assistance.
2. RRH. At initial evaluation, program participants must meet the applicable HUD homeless eligibility requirements for Rapid-Rehousing. There is no income eligibility requirement at initial evaluation. Rapid Re-Housing Eligibility must be re-evaluated at least annually, and at re-evaluation, the household must have an annual income at or below 30 percent of AMI, as determined by HUD; and continue to lack sufficient resources and support networks necessary to retain housing without ESG assistance.
3. HP. At initial evaluation, program participants must meet the applicable HUD eligibility requirements for Homelessness Prevention, including the applicable income requirement of below 30 percent of AMI, and must lack sufficient resources and support networks necessary to prevent homelessness. Eligibility must be re-evaluated at least once every three months, and at re-evaluation, the household must have an annual income at or below 30 percent of AMI and continue to lack sufficient resource and support networks necessary to retain housing without ESG assistance.
4. Income Limits. Current ESG income limits are established by HUD and must be used when an income determination is required. Current income limits are available here: HUD Exchange Income Limits .This link also includes the CPD Income Eligibility Calculator. Subrecipients are responsible for using the HUD income limits in effect at the time eligibility or continued eligibility is determined.

Provision of Supportive Services

ESG subrecipients must make appropriate supportive services available when necessary to assist program participants in obtaining or maintaining housing and achieving housing stability. However, individuals and families experiencing homelessness may not be required to participate in treatment or perform other prerequisite activities as a condition of receiving shelter, housing, or other ESG-funded services, except as specifically permitted or required by applicable ESG regulations.

For HP and RRH, program participants receiving rental assistance or housing stability services must meet with a case manager as required by **24 CFR § 576.401(e),** except when the applicable regulatory exception applies.

Financial Requirements

ESG subrecipients must comply with the following requirements governing the use and administration of ESG funds.

1. Release of Funds. All applicants must submit the required Environmental Review Record for Exemptions/Release of Funds form with the ESG application. Following award, ESG subrecipients must receive authorization from ODOC to use ESG funds before expending

grant funds. ODOC will not issue the Release of Funds until all required documentation and applicable requirements have been satisfied. Costs incurred before the effective date of the Release of Funds are not eligible for reimbursement.

2. Budget. A proposed project budget and budget narrative must be included with each ESG application. The budget must identify the amount of ESG funds budgeted for each applicable activity or cost category. The budget narrative must describe the anticipated expenditures and explain how the requested funds will be used. ESG budgets are subject to the following requirements:
3. Administration: Administrative costs may not exceed 3.75 percent of the ESG award.
4. Housing Activities: At least 40 percent of the total ESG grant award must be budgeted for Rapid Re-Housing and Homelessness Prevention activities combined, in accordance with ODOC ESG requirements. This requirement may be met at the CoC level when a written agreement between the subrecipient and CoC is submitted to ODOC with the application.
5. Matching Funds. ESG subrecipients must provide a dollar-for-dollar match equal to the amount of ESG funds awarded. Eligible cash and non-cash contributions used as match must be available and expended during the applicable ESG contract period.
6. Applicants must identify the sources and amounts of proposed matching funds on the Match Certification page in OGX, including the period during which each match source will be available.
7. Funds or contributions used to satisfy the matching requirements of another federal program, or another ESG award may not be used as match for the current ODOC ESG award. Likewise, ESG funds may not be used to satisfy the matching requirements of another program.
8. Matching funds are required based on the total ESG award and are not required on a component-by-component basis. For example, a subrecipient receiving $10,000 for HMIS activities is not required to provide $10,000 in matching funds specifically for HMIS. The required match may be provided through other ESG eligible sources and activities.
9. All matching contributions must meet applicable ESG eligibility requirements and be supported by adequate documentation. Except to the extent a subrecipient receives the benefit of the State's first-$100,000 match exception under 24 CFR § 576.201(a), matching contributions must equal the amount of ESG funds subject to the matching requirement. ODOC will pass the benefit of the State's first-$100,000 match exception to subrecipients that are least capable of providing matching contributions, in accordance with 24 CFR § 576.201(a).
10. Matching funds must be reported on the ESG monthly reimbursement claim. The cumulative amount of eligible matching funds reported must be greater than or equal to the cumulative amount of ESG funds expended.
11. Reimbursement Claims. ESG funds are provided on a reimbursement basis. Following issuance of the Release of Funds, subrecipients may submit reimbursement claims to ODOC through OGX for eligible ESG expenditures incurred during the contract period.
12. Reimbursement claims must be submitted through OGX by the 20th of each month and must include all required supporting documentation. Only eligible, adequately documented expenditures will be reimbursed. Subrecipients must submit ESG claims monthly, even if they have no expenditures.

13. Matching funds must be reported on each monthly reimbursement claim, in accordance with the Matching Funds requirement above.
14. If a reimbursement claim requires correction or additional information (including supporting documentation), ODOC will return the claim to subrecipient through OGX for revision and resubmission.
15. Payments. ODOC will review submitted reimbursement claims and support documentation for compliance with applicable HUD, ESG and ODOC requirements. Upon approval of an eligible claim, ODOC will issue reimbursement to the subrecipient.
16. Expenditure Requirements. The ESG contract period is 12 months, beginning October 1, and ending September 30th. Subrecipients are expected to expend ESG funds throughout the contract period and must meet the following expenditure benchmarks:
17. 50 percent of ESG funds expended within the first six months of the contract period;
18. 75 percent expended within the first nine months; and
19. 100 percent expended by the end of the contract period. Extensions of the contract period are made solely at the discretion of ODOC and will occur only in exceptional circumstances.

Audit Requirements

ODOC ESG subrecipients must comply with all applicable audit requirements established in the ODOC Audit Policies and Procedures Manual, 2 CFR Part 200, Subpart F, applicable Oklahoma law, and other applicable state and federal requirements.

Required audit reports must be submitted to ODOC within the timeframes established by applicable law and ODOC policy. The subrecipient's required current audit must be on file with ODOC and satisfactorily resolved before ESG funds are released. Failure to comply with applicable audit requirements may delay or restrict access to ESG funds and may result in special conditions being placed on the award.

If an audit cannot be completed within the required timeframe, the subrecipient must notify ODOC and provide documentation explaining the delay. ODOC may require additional documentation, technical assistance or a corrective plan, as appropriate.

ESG match is a contractual requirement and must be properly reflected and documented in the subrecipients' financial records and audit, as applicable.

Client Confidentiality

ODOC ESG subrecipients must develop and implement procedures to protect the confidentiality and privacy of ESG applicants and program participants. At a minimum, subrecipients must ensure that:

- Records containing Personally Identifiable Information (PII), as defined in the Manual, for any individual or family who applies for or receives ESG assistance are maintained securely and confidentially.
- The address or location of any shelter servicing survivors of domestic violence, dating violence, sexual assault or stalking will not be made public without the written authorization of the person responsible for the operation of the shelter.
- The address or location of a program participant's housing will not be made public except as permitted under an existing privacy policy of the recipient or subrecipient and consistent with applicable state and local privacy and confidentiality requirements.

ODOC ESG subrecipients must not submit unredacted PII to ODOC unless specifically requested or required by ODOC.

Language Access

ODOC ESG subrecipients must comply with ODOC's Language Access Plan (LAP) and take reasonable steps to ensure meaningful access to ESG programs and services for individuals with Limited English Proficiency (LEP), consistent with Title VI of the Civil Rights Act of 1964 and applicable federal language access requirements.

Based on ODOC's Four-Factor Analysis, ESG vital documents must be made available in the languages and ODOC ESG subrecipient service areas as listed below:

- Spanish: All ESG subrecipients statewide.
- Chinese: ESG subrecipients serving Payne and Cleveland Counties.
- Vietnamese: ESG subrecipients serving Canadian and Cleveland Counties.

For purposes of ODOC's ESG program, vital documents include documents that program participants must complete to establish eligibility for or receive ESG assistance and that subrecipients are required to maintain in the client file.

ODOC provides translated versions of the standardized ESG vital documents in Spanish, Chinese and Vietnamese. These documents are available on the ODOC ESG Webpage: ODOC-ESG.

Application Workshop

ODOC will conduct a mandatory ESG Application Workshop each program year. Organizations intending to apply for ESG funding must attend the workshop in accordance with the requirements and schedule posted in the RFA.

After the ESG application is made available in OGX, ODOC will respond only to questions seeking clarification of the RFA, application requirements, or ESG program requirements. ODOC will not provide applicant specific technical assistance or guidance that could influence the preparation, content, or scoring of an application during the competitive application process.

Application Review and Funding Recommendation Process

Following the application deadline, ODOC will assign eligible applications to trained volunteer reviewers. Reviewers will not be assigned applications submitted by organizations within their own CoC.

ODOC will provide reviewer training on the ESG scoring criteria, scoring tool and use of OGX. Scoring criteria and reviewer materials will be provided after the application deadline and after the reviewer training. Reviewers must complete assigned reviews by the deadline established by ODOC.

Each eligible application will be assigned to three reviewers. The two highest scores will be averaged and provided to the applicable CoC for use in developing its funding recommendations.

Following completion of the review process, each CoC Lead Agency will submit its funding recommendations to ODOC, identifying the applicants recommended for funding and the recommended award amount for each applicant. Total recommended awards may not exceed the ESG allocation available to the CoC.

ODOC will review the CoC funding recommendations and conduct a Pre-Award Risk Assessment of applicants recommended for funding. Risk Assessment results may be used to establish special conditions, additional technical assistance, monitoring or documentation requirements for an ESG award. ODOC may approve, modify or decline a CoC funding recommendation based on factors including:

- Failure to submit a completed application by the given due date;
- Failure to meet applicable ESG threshold requirements;
- Application scores that do not meet ODOC's minimum scoring requirements;
- Results of the ODOC Pre-Award Risk Assessment;
- Unresolved compliance or performance concerns; or
- Ineligible costs or activities identified during ODOC's review.

Following completion of the review and award determination process, ODOC will issue award notifications with instructions for initiating the contracting process in OGX.

Verification and On-Site Visits

ODOC reserves the right to verify information and documentation submitted as part of an ESG application. Verification may include requests for additional documentation or the conduction of an on-site visit to observe the facility or location where proposed ESG activities will be carried out. When ODOC determines that an on-site visit is necessary, the applicant may be provided as little as 24 hours' notice. When applicable, representatives of both the sponsored organization and sponsor must be available during the visit.

Following award, ODOC may verify programmatic and fiscal compliance and request documentation necessary to assess compliance with applicable ESG requirements, the ESG Implementation Manual, Contract Part II, and the approved ESG application

Program Application Guidelines and Submission Requirements

ESG applications must be submitted electronically through OGX by the deadline established in the RFA.

When a private nonprofit organization, (UGLG), or CAA applies on behalf of more than one sponsored organization, a separate application must be submitted for each sponsored organization.

An applicant may request funding for multiple eligible ESG components or activities within a single application, including Street Outreach, Emergency Shelter, Homelessness Prevention, Rapid Re-Housing, and HMIS.

Instructions for accessing and using OGX are available on the ODOC OGX Resource Page.

Requirement No. 701
Continuum of Care (CoC) Criteria
Effective October 1, 2026

Requirement

ODOC ESG subrecipients must coordinate ESG-funded activities with other programs serving individuals and families experiencing homelessness, or at-risk-of-homelessness, within the applicable CoC to support a coordinated, community-wide system for preventing homelessness.

Procedures

CoC Eligibility Criteria. Each eligible CoC may receive an allocation of State ESG funds for its service area. To participate in the State ESG allocation and funding recommendation process, the CoC must comply with applicable HUD CoC and ODOC ESG requirements.

1. HUD-Established CoC Responsibilities. A CoC must carry out the responsibilities established under 24 CFR § 578.7, including the following:
    a. Operate the CoC:
    - Hold meetings of the full CoC membership, with published agendas, at least semiannually.
    - Make an invitation for new members publicly available at least annually.
    - Adopt and follow a written process for selecting the CoC Board. The process must be reviewed, updated, and approved by the CoC at least once every five years.
    - Appoint committees, subcommittees, or workgroups as necessary.
    - Develop, follow, and annually update a governance charter in consultation with the Collaborative Applicant and HMIS Lead.
    - Establish appropriate performance targets, monitor recipient and subrecipient performance, evaluate outcomes, and address poor performance.
    - Evaluate outcomes of ESG- and CoC-funded projects.
    - Establish and operate a centralized or coordinated assessment system in consultation with ESG recipients within the geographic area.
    - Establish and consistently follow applicable written standards for providing assistance.
    b. Designate and Operate an HMIS
    - Designate a single HMIS for the CoC's geographic area and an eligible applicant to serve as the HMIS Lead.
    - Review, revise, and approve the HMIS privacy, security, and data quality plans.
    - Ensure consistent HMIS participation by recipients and subrecipients.
    - Ensure the HMIS is administered in accordance with applicable HUD requirements.
    c. Coordinate CoC Planning:
    - Coordinate the implementation of a housing and service system within the CoC’s geographic area.
    - Plan for and Conduct a Point-in-Time count of homeless persons, at least biennially in accordance with HUD requirements.
    - Conduct an annual gaps analysis of homeless needs and available services.
    - Provide information required to complete applicable Consolidated Plan(s).

- Consult with State and local ESG recipients regarding ESG funding allocations and the reporting and evaluation of ESG recipient and subrecipient performance.
- The CoC must also develop and maintain a VAWA emergency transfer plan in accordance with 24 CFR § 578.7(d).

2. ODOC ESG CoC Responsibilities. In addition to applicable HUD requirements, CoCs participating in the ODOC ESG allocation and funding recommendation process must comply with the following ODOC ESG requirements:
    a. Funding Allocation Policies. Each CoC Governing Board must establish and maintain written policies and procedures governing its ESG funding recommendation process, including how available ESG funds will be distributed among eligible applicants and activities within the CoC service area.
    b. 40% Housing Requirement. At least 40 percent of the applicable ESG allocation must be budgeted for Rapid Re-Housing and/or HP activities. The CoC may meet this requirement across its overall ESG allocation. When the requirement is met at the CoC level, a written agreement between the CoC and ESG subrecipient must be submitted to ODOC with the ESG application.
    c. Local Funding and Scoring Criteria. A CoC may establish additional local funding priorities or scoring criteria for use in developing its ESG funding recommendations. Any additional criteria must be consistent with applicable ESG and ODOC requirements and should support the CoC's identified priorities, performance goals or local needs. Any additional local funding priorities or scoring criteria must be established and communicated to potential applicants before the application period begins.
    d. Appeal Process. Each CoC Governing Board must establish and maintain a written appeal process for ESG applicants whose funding request is denied or not recommended for funding. At a minimum, the appeal process must identify:
        - The timeframe and procedure for submitting a written appeal;
        - The timeframe and process for the CoC Governing Board to consider and decide the appeal; and
        - The applicant's right to appeal the CoC's final decision to ODOC after the local appeal process has been exhausted.
    e. Redistribution Process. Each CoC Governing Board must establish and maintain written policies and procedures for developing funding recommendations when ESG funds become available within the CoC service area after the initial funding recommendations have been made. The procedures must provide for the redistribution of available funds among eligible ESG applicants and activities in a manner consistent with applicable ESG and ODOC requirements and the CoC's established funding priorities.
    f. Annual Public Meeting. Each CoC Governing Board must conduct at least one public meeting between June and September of each year to discuss proposed changes to the ESG program for the upcoming funding year and provide an opportunity for public input.
        - The meeting must be conducted and notice provided in accordance with the Oklahoma Open Meeting Act, when applicable, and any additional ODOC requirements.

CoC Eligibility Documentation

In accordance with the timetable established in the ESG RFA, each CoC Lead must submit the documentation required by ODOC to verify the CoC's eligibility to participate in the State ESG allocation and funding recommendation process. Required documentation includes:

- Application Reviewer Information: Names and contact information for the application reviewers provided by ESG applicants within the CoC, along with the names of any additional volunteer reviewers identified by the CoC.
- Governance Charter: The CoC's current Governance Charter.
- Point-in-Time Count Documentation: Current PIT Count documentation identifying the organization responsible for submitting CoC's PIT data to HUD through HDX.
- Collaborative Applicant Documentation: Current documentation identifying the CoC's Collaborative Applicant or Lead Agency as applicable.
- Funding and Governance Documentation: Documentation of applicable CoC Governing Board actions affecting the ESG funding recommendation process, including relevant meeting agendas, minutes and appropriate policies and procedures.

Distribution and Redistribution of ESG Funds

ODOC may establish ESG funds that cannot be awarded within a CoC service area including when:

- The CoC does not meet applicable eligibility or participation requirements;
- There are insufficient eligible applicants or eligible activities to fully utilize CoC's available allocation; or
- Previously awarded funds are returned, recaptured or otherwise become available for redistribution.
- Funds available for redistribution may be awarded within the applicable CoC service area when eligible applicants have the capacity to use the funds in accordance with ESG and ODOC requirements. When funds cannot be effectively utilized within the applicable CoC service area, ODOC may redistribute the funds to other eligible CoCs in accordance with applicable ESG requirements and ODOC-established procedures.

Requirement No. 702 Acronyms and Definitions Effective October 1, 2026

Table of Acronyms. Below is a table of common acronyms used in ODOC's ESG program.

Title	Acronym
Oklahoma Department of Commerce	ODOC
Department of Housing and Urban Development	HUD
Community Action Agency	CAA
Continuum of Care	CoC
Duplication of Benefits	DoB
Emergency Solutions Grant	ESG
American Community Survey	ACS
Average Median Income	AMI
Language Accessibility Plan	LAP
Limited English Proficiency	LEP
Housing Inventory Count	HIC
Homeless Management Information System	HMIS
Unit of General Local Government	UGLG
Community Development	CD
Oklahoma Department of Commerce/Community Development	ODOC/CD
Oklahoma Grants Exchange	OGX
Rapid Re-Housing	RRH
Homeless Prevention	HP
Personally Identifiable Information	PII
Point-In-Time Count	PIT
Consolidated Annual Performance and Evaluation Report	CAPER
System for Aggregate Reporting and Evaluation	SAGE
System for Award Management	SAM
Violence Against Women Act	VAWA
Victim Service Provider	VSP

Definitions

For the purposes of this Implementation Manual, the following definitions will be used:

Administration **–** ODOC limits administrative funds provided to an ESG subrecipient to no more than 3.75 percent of the applicable subrecipient award, when administrative funds are authorized by ODOC.

American Community Survey (ACS) – An ongoing survey conducted by the U.S. Census Bureau that provides data on population, housing, income, and other demographic indicators used for planning, funding formulas, and community needs assessments.

At Risk of Homelessness – Meaning established in 24 CFR § 576.2. Eligibility must be determined using the applicable elements of the federal definition and documentation requirements in 24 CFR § 576.500(c).

Case Management – A coordinated set of services in which a staff person assesses participant needs, develops service plans, connects participants to appropriate resources, and monitors progress toward achieving housing stability and self-sufficiency.

Chronically Homeless – A homeless individual with a disability who has lived in a place not meant for human habitation, a safe haven, or emergency shelter for at least 12 consecutive months, or has experienced at least four episodes of homelessness in the past three years totaling at least 12 months; this definition also includes individuals exiting institutions after short stays who were previously homeless, as defined in 24 CFR 578.3.

Co-Occurring Disorder – A condition in which an individual has both a mental health disorder and a substance use disorder or other significant health condition.

Comparable Database – A data system used by victim service providers that meets HUD requirements for data collection and reporting while protecting client confidentiality in lieu of the Homeless Management Information System (HMIS).

Consolidated Annual Performance and Evaluation Report (CAPER) – A report required by HUD that summarizes annual performance and outcomes of federally funded housing and community development programs, including ESG.

Consolidated Plan – A housing and community development planning document prepared in accordance with 24 CFR Part 91 and approved by HUD.

Continuum of Care (CoC) – A regional planning body composed of public, nonprofit, and private stakeholders responsible for coordinating housing and services for individuals experiencing homelessness, including outreach, emergency shelter, rapid re-housing, transitional housing, permanent housing, and prevention strategies.

Coordinated Entry (CE) – or Coordinated Intake (CI) is a standardized process used by Continuums of Care to assess, prioritize, and refer individuals and families experiencing homelessness to appropriate housing and services based on need and vulnerability.

Cultural Competency – The ability of organizations and service providers to effectively deliver services that meet the social, cultural, and linguistic needs of diverse populations.

Cultural Responsiveness – An approach to service delivery that recognizes and appropriately responds to the cultural backgrounds, experiences, and identities of individuals receiving services.

Debarment – A status in which an individual or organization is prohibited from receiving federal funding or participating in federal programs due to violations such as fraud or mismanagement, as verified through SAM.gov.

Developmental Disability – A severe, chronic disability defined under 42 U.S.C. 15002 that results from a physical or mental impairment, begins before age 22, is expected to continue indefinitely, and causes substantial functional limitations in major life activities.

Domestic Violence – Per 34 U.S.C. 12291(a)(12), the term 'domestic violence' includes felony or misdemeanor crimes committed by a current or former spouse or intimate partner of the victim under the family or domestic violence laws of the jurisdiction receiving grant funding and, in the case of victim services, includes the use or attempted use of physical abuse or sexual abuse, or a pattern of any other coercive behavior committed, enabled, or solicited to gain or maintain power and control over a victim, including verbal, psychological, economic, or technological abuse that may or may not constitute criminal behavior, by a person who:

- Is a current or former spouse or intimate partner of the victim, or person similarly situated to a spouse of the victim;
- Is cohabitating, or has cohabitated, with the victim as a spouse or intimate partner;
- Shares a child in common with the victim; or
- Commits acts against a youth or adult victim who is protected from those acts under the family or domestic violence laws of the jurisdiction.

Duplication of Benefits (DoB)– A situation in which a person, household, or entity receives financial assistance from multiple sources for the same purpose and time period, and the combined assistance exceeds the total need for that purpose.

Economic Abuse – Per 34 U.S.C. 12291(a)(13), the term 'economic abuse', in the context of domestic violence, dating violence, and abuse in later life, means behavior that is coercive, deceptive, or unreasonably controls or restrains a person's ability to acquire, use, or maintain economic resources to which they are entitled, including using coercion, fraud, or manipulation to:

- Restrict a person's access to money, assets, credit, or financial information;
- Unfairly use a person's personal economic resources, including money, assets, and credit, for one's own advantage; or
- Exert undue influence over a person's financial and economic behavior or decisions, including forcing default on joint or other financial obligations;
- Exploiting powers of attorney, guardianship, or conservatorship; or
- Failing or neglecting to act in the best interests of a person to whom one has a fiduciary duty.

Eligible Applicants – Units of General Local Government and-private nonprofit organizations meeting ODOC eligibility requirements may receive State ESG funds. ODOC may establish additional application, sponsorship, audit, and prior experience requirements through the ESG RFA and this Manual.

Emergency Shelter (ES) – Has the meaning established in 24 CFR § 576.2. ODOC Requirement: Applicants relying on emergency shelter access must demonstrate access to shelter 24 hours per day, seven days per week, 365 days per year, as provided in Requirement 700.

Environmental Review – A federally required assessment process conducted in accordance with HUD regulations to evaluate the environmental impact of proposed projects before ESG funds may be expended.

Equipment and Furnishings – Major one-time purchases necessary for shelter operations, including beds, furniture, office equipment, and other items required to support program services.

Exclusion - For purposes of ESG, the term "homeless" or "homeless individual" does not include any individual imprisoned or otherwise detained pursuant to an Act of the Congress or State Law.

Fair Rental Value – The estimated market rate that a property or space would command in an open rental market, used to determine the value of donated space or property for match purposes.

Family – includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, any group of persons presenting for assistance together with or without children and irrespective of age, relationship, or whether a member of the household has a disability. A child who is temporarily away from the home because of placement in foster care is considered a member of the family. This definition (clarified here) is specifically for the ESG and CoC programs because it combines the HUD Equal Access Rule with the McKinney Vento Act as amended by the HEARTH Act (which distinguishes individual from families).

Families with Children and Youth Defined as Homeless under Other Federal Statutes – Children and youth who meet the definition of homelessness under other federal laws but not under the McKinney-Vento Homeless Assistance Act.

Homeless – An individual or family lacking a fixed, regular, and adequate nighttime residence, including those living in places not meant for human habitation, staying in emergency shelters, exiting institutions after short stays where they were previously homeless, at imminent risk of losing housing, or fleeing domestic violence or other dangerous conditions, as defined in 24 CFR 576.2.

Homeless Individual with a Disability – A person who is homeless and has a long-term or indefinite disability that substantially limits the ability to live independently and could be improved with stable housing.

Homeless Management Information System (HMIS) – The data system designated by the Continuum of Care to collect, manage, and report information on individuals and families experiencing homelessness and the services provided to them, in compliance with HUD standards.

Homelessness Data Exchange (HDX) – HUD's online data platform used by Continuums of Care to submit Point-in-Time Count data and other required homelessness reporting.

Homelessness Prevention (HP) – Housing relocation and stabilization services and financial assistance provided to individuals or families at risk of homelessness, typically with income below 30% AMI, in accordance with 24 CFR 576.105–576.106.

Household – A single individual or a group of persons who live together or would live together in a housing unit if stable housing were available.

Housing First – A service approach that prioritizes rapid placement into permanent housing without preconditions such as sobriety or participation in treatment, while offering supportive services on a voluntary basis.

Housing Inventory Count (HIC) – A point-in-time inventory of all beds and units dedicated to serving persons experiencing homelessness within a Continuum of Care geographic area, reported annually to HUD.

HUD - U.S. Department of Housing and Urban Development.

Income Eligibility - A homeless individual shall be eligible for assistance under any program provided by the Stewart B. McKinney Homeless Assistance Act, or by the amendments made by this Act, only if the individual complies with the income eligibility requirements otherwise applicable to such program.

Individuals – Persons not accompanied by children or adult partner. Individuals can also mean the number of family members in a household.

In-Kind Contributions – Non-cash resources such as donated goods, services, or property that are assigned a monetary value and used to meet ESG match requirements.

Limited English Proficient (LEP) – Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English.

Language Access Plan (LAP) – A plan developed by ODOC to ensure meaningful access to programs and services for individuals with limited English proficiency in compliance with federal civil rights laws.

Major Rehabilitation – Rehabilitation activities in which the cost exceeds 75% of the value of the building prior to rehabilitation and must meet HUD habitability and accessibility standards.

Match Funds – Contributions that equal the amount of ESG funding received and may include cash, volunteer services, donated goods or materials, or staff salaries, provided that all match expenditures occur within the contract period and are properly documented.

Monitoring – The process by which ODOC reviews subrecipient activities, financial records, and program performance to ensure compliance with ESG requirements, including both programmatic and fiscal oversight.

No Wrong Door – A service approach in which individuals can access housing and services through any entry point within the system and be appropriately assessed and referred without being denied access based on where they first seek assistance.

Nonprofit Recipient – A nonprofit organization that receives ESG funds from a unit of local government or Community Action Agency to provide services to individuals experiencing homelessness.

Obligated – Funds that have been committed through legally binding agreements such as contracts or purchase orders that require payment from ESG funds.

Oklahoma Grant Exchange (OGX) – The State of Oklahoma's online grants management system used for application submission, document upload, contract execution, and reimbursement processing for ESG and other state-administered grants.

Operations – Eligible costs associated with the operation of an emergency shelter, including maintenance, rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies, as permitted under 24 CFR § 576.102 and applicable ESG requirements. Administrative expenses are addressed separately under 24 CFR § 576.108.

Personally Identifiable Information (PII) - Refers to information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual. The definition of PII is not anchored to any single category of information or technology. Rather, it requires a case-by-case assessment of the specific risk that an individual can identify. In performing this assessment, it is important for an agency to recognize that non-PII can become PII whenever additional information is made publicly available - in any medium and from any source - that, when combined with other available information, could be used to identify an individual.

Permanent Housing – Long-term housing solutions without a designated end date, including rental housing or homeownership.

Permanent Supportive Housing (PSH) – Permanent housing combined with supportive services designed to assist individuals with disabilities experiencing chronic homelessness in maintaining long-term housing stability.

Point-in-Time Count (PIT Count) – A biennial count of sheltered and unsheltered individuals experiencing homelessness conducted by Continuums of Care on a single night, as required by HUD.

Pre-Award Risk Assessment – An evaluation conducted by ODOC prior to contract execution to assess an applicant's financial capacity, prior performance, internal controls, and overall risk level.

Private Nonprofit Organization – An organization that qualifies under Section 501(c) of the Internal Revenue Code, maintains an accounting system, has a voluntary governing board, and provides services without discrimination.

Program Income – Income generated through ESG-funded activities, such as returned security or utility deposits, which may be used to support eligible ESG activities and count toward match requirements.

Program Participant – An individual or family receiving assistance through an ESG-funded program.

Program Year – The consolidated planning and funding period established by the recipient in accordance with 24 CFR Part 91.

Project-Based Rental Assistance (PBRA) –Rental assistance tied to a specific housing unit rather than to an individual program participant. Although permitted under 24 CFR § 576.106, ODOC does not fund project-based rental assistance under the State ESG Program.

Protected Personally identifiable Information (PII) - an individual's first name or first initial and last name in combination with any one or more of types of information, including, but not limited to, social security number, passport number, credit card numbers, clearances, bank numbers, biometrics, date and place of birth, mother's maiden name, criminal, medical and financial records, educational transcripts. This does not include PII that is required by law to be disclosed.

Rapid Re-Housing (RRH) – Housing relocation and stabilization services combined with short- or medium-term rental assistance designed to help individuals and families quickly move into permanent housing.

Recipient – A state or local government entity approved by HUD to receive and administer ESG funding.

Rehabilitation – Improvements made to buildings used as emergency shelters, including repairs, accessibility upgrades, and structural modifications, with a requirement that the facility continue to operate as a shelter for a specified period.

Release of Funds (RoF) – Formal written authorization from ODOC allowing a subrecipient to begin incurring and requesting reimbursement for eligible ESG program costs after all pre-award conditions have been satisfied.

Reimbursement Claim – A request submitted by a subrecipient ~~recipient~~ to ODOC for repayment of eligible program expenses that have already been incurred and paid.

Street Outreach (SO) – Activities designed to engage unsheltered individuals and families experiencing homelessness, consistent with 24 CFR Part 576.101.

Subrecipient – A unit of local government or nonprofit organization that receives ESG funds from a recipient to carry out program activities.

System for Aggregate Reporting and Evaluation (SAGE) – HUD's online reporting system used by ESG recipients to submit aggregate, de-identified program data derived from HMIS or comparable databases.

System for Award Management (SAM) – The federal registration system used to verify eligibility for federal funding; all ESG applicants must maintain an active registration and cannot be listed as debarred or suspended.

Technological Abuse – Per 34 U.S.C. 12291(a)(40), the term 'technological abuse' means an act or pattern of behavior that occurs within domestic violence, sexual assault, dating violence or stalking and is intended to harm, threaten, intimidate, control, stalk, harass, impersonate, exploit, extort, or monitor, except as otherwise permitted by law, another person, that occurs using any form of technology, including but not limited to: internet enabled devices, online spaces and platforms, computers, mobile devices, cameras and imaging programs, apps, location tracking devices, or communication technologies, or any other emerging technologies.

Telework – A work arrangement in which employees perform job duties from an approved remote location in accordance with the Telework Enhancement Act of 2010.

Tenant-Based Rental Assistance (TBRA) – Rental assistance provided directly to program participants that allows them to move between eligible housing units while retaining assistance.

Transitional Housing – Temporary housing with supportive services, typically limited to 24 months, designed to help individuals and families transition to permanent housing.

Trauma – A physically or emotionally harmful experience that may have long-lasting negative effects on an individual's mental, physical, or emotional well-being.

Trauma-Informed Approach – A service delivery framework that recognizes the impact of trauma, identifies its signs and symptoms, integrates this understanding into policies and practices, and seeks to avoid re-traumatization.

Unaccompanied Youth – Individuals under the age of 25 who are experiencing homelessness without a parent or guardian and who meet federal eligibility criteria; youth in state custody are not eligible for ESG assistance.

Underserved Populations – Groups that face barriers to accessing housing or services due to factors such as geographic isolation, race, ethnicity, language, disability, age, or immigration status.

Unit of Local Government (UGLG) – A general-purpose political subdivision of a state, including a city, county, town, township, parish, or village.

Value of a Building – The monetary value assigned to a building used for ESG purposes, determined by appraisal or another approved method, which may count toward match only under specific conditions.

VAWA – The Violence Against Women Act (VAWA) is a federal law that, in part, provides housing protections for people applying for or living in units subsidized by the federal government and who have experiences domestic violence, dating violence, sexual assault, or stalking, to help keep them safe and reduce their likelihood of experiencing homelessness. VAWA protects any person that is a CoC (RRH, Trans. Housing, Permanent Supportive Housing) / ESG (RRH, HP) project applicant or tenant and a victim of DV, dating violence, sexual assault, or stalking. The ESG Recipient and Subrecipient are all responsible for the development of VAWA policies and implementing those procedures.

Victim Service Provider (VSP) – A private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking.

Victim Services – Services that support survivors of violence, including shelter, counseling, advocacy, and related assistance.

Weather and Safety Leave – Leave granted when employees are unable to safely travel to or work due to emergencies such as natural disasters, terrorist events, or other hazardous conditions.

Requirement 703
ESG Eligible Program Activities
Effective October 1, 2026

Requirement

ODOC ESG subrecipients may use ESG funds only for eligible activities and costs authorized under 24 CFR Part 576 and identified as allowable under ODOC ESG requirements. Activities or costs not identified as eligible under the applicable ESG program component are not allowable and may not be paid with ESG funds.

Procedures

1. Street Outreach Component 24 CFR § 576.101
    a. Eligible Costs / Essential Services. Street Outreach funds may be used to provide essential services necessary to engage individuals and families experiencing unsheltered homelessness; connect them with emergency shelter, housing, and critical services; and provide urgent, non-facility-based assistance when appropriate shelter, housing, or health services are unavailable or inaccessible.
        - For Street Outreach eligibility, individuals and families must meet the applicable HUD definition of unsheltered homelessness.
        - Street Outreach activities must be conducted in locations where individuals and families experiencing unsheltered homelessness are living or staying. Street Outreach requires outreach workers to locate and engage individuals and families in those settings. Services provided solely because an individual or family come to an agency office or other service location do not constitute Street Outreach. Street Outreach activities include:
    b. Engagement. Eligible costs include activities to locate, identify, build relationships with, and engage individuals and families experiencing unsheltered homelessness for the purpose of providing immediate support, intervention, and connections to homeless assistance programs, mainstream services and housing programs. Eligible activities include:
        - Initial assessment of needs and eligibility;
        - Crisis counseling;
        - Addressing urgent physical needs, such as meals, blankets, clothing or toiletries;
        - Providing information and referrals and actively connecting individuals and families to appropriate homeless assistance programs, mainstream services and housing programs; and
        - Cell phone costs for outreach workers while performing eligible Street Outreach activities.
    c. Case Management. Eligible costs include assessing housing and service needs and arranging, coordinating, and monitoring individualized services for program participants. Eligible activities include:
        - Using the applicable Coordinated Entry system, as required by 24 CFR § 576.400(d);

- Conducting the initial evaluation required by 24 CFR § 576.401(a), including verifying and documenting eligibility;
- Providing counseling;
- Developing, securing, and coordinating services;
- Assisting program participants in obtaining Federal, State, and local benefits;
- Monitoring and evaluating program participant progress;
- Providing information and referrals to other service providers; and
- Developing an individualized housing and service plan, including a path toward permanent housing stability.

d. Emergency Mental Health Services. Eligible costs include direct outpatient treatment of mental health conditions by licensed professionals in community-based settings, including streets, parks and other locations where individuals and families experiencing homelessness are living. ESG funds may be used only when other appropriate mental health services are inaccessible or unavailable within the community. Eligible services include:
   - Crisis intervention;
   - Therapeutic treatment;
   - Prescription of psychotropic medications;
   - Education regarding the sue and management of medications; and
   - Other eligible treatments necessary to address mental health needs.

e. Emergency Health Services. Eligible costs include direct outpatient treatment of medical conditions provided by licensed medical professionals in community-based settings, including streets, parks, and other locations where individuals and families experiencing unsheltered homelessness are living. ESG funds may be used only when other appropriate health services are unavailable or inaccessible within the area. Eligible services include:
   - Assessing health needs;
   - Developing a treatment plan;
   - Assisting program participants in understanding their health needs;
   - Providing or assisting program participants in obtaining appropriate emergency medical treatment; and
   - Providing medication and follow-up services.

f. Transportation Services. ESG funds may be used for transportation costs incurred while providing eligible Street Outreach services. Transportation costs may also include transporting unsheltered program participants to emergency shelters or other service facilities. Eligible transportation costs include:
   - Public transportation costs for program participants;
   - Mileage reimbursement when service workers use their personal vehicles to visit program participants;
   - The purchase or lease of a vehicle used by the subrecipient to transport program participants and/or staff service program participants, including related gas, insurance, taxes, and maintenance costs; and
   - Staff travel costs incurred when accompanying or assisting program participants using public transportation.

g. Services for Special Populations. ESG funds may be used to provide eligible Street Outreach services to homeless youth, victims of domestic violence, dating violence, sexual assault, or stalking and people living with HIV/AIDS. The cost of providing these services must otherwise be eligible under the Street Outreach activities described in the paragraphs (a) through (e) above.
    - Victim services may include services provided by rape crisis centers, domestic violence shelters and other organizations with a documented history of effectively serving victims of domestic violence, dating violence, sexual assault or stalking.
h. Minimum Period of Use. Subrecipients receiving ESG funds for Street Outreach must provide services to individuals and families experiencing homelessness for at least the period during which ESG funds are provided.
i. Maintenance of Effort. If an ESG subrecipient is an UGLG, ESG funds must not be used to replace local government funds provided for Street Outreach or Emergency Shelter services during the immediately preceding 12-month period.
    - An exception may apply if HUD determines that the UGLG is experiencing a severe financial deficit. An UGLG seeking this exception must provide the information necessary to support a request for HUD's determination in accordance with 24 CFR § 576.101(c)(2).

2. Emergency Shelter Component (24 CFR § 576.102)
    a. Essential Services. ESG funds may be used for eligible costs associated with providing essential services to individuals and families experiencing homelessness who are residing in emergency shelters and for operating emergency shelters, subject to the applicable expenditure limitations under 24 CFR Part 576. ODOC does not allow ESG funds to be used for emergency shelter renovations, major rehabilitation, or conversion.
    b. Case Management. ESG funds may be used for the costs of assessing, arranging, coordinating and monitoring the delivery of individualized services to meet the needs of program participants residing in emergency shelter. Eligible case management activities include:
        - Using the Coordinated Entry system, as required by 24 CFR § 576.400(d);
        - Conducting the initial evaluation required by 24 CFR § 576.401(a), including verifying and documenting program participant eligibility;
        - Providing counseling;
        - Developing, securing, and coordinating services and assisting program participants in obtaining Federal, State, and local benefits;
        - Monitoring and evaluating program participant progress;
        - Providing information and referrals to other service providers;
        - Providing ongoing risk assessment and safety planning for victims of domestic violence, dating violence, sexual assault, and stalking; and
        - Developing an individualized housing and service plan, including planning a path toward permanent housing stability.
    c. Childcare. ESG funds may be used for childcare costs for children of program participants residing in an emergency shelter. Eligible costs may include:
        - Meals and snacks; and

- Appropriate developmental activities.
    - The following requirements apply:
    - Children must be under age 13, unless they have a disability;
    - Children with disabilities must be under age 18; and
    - The childcare center must be licensed by the jurisdiction in which it operates.

d. Education Services. When necessary, to help a program participant obtain and maintain housing, ESG funds may be used for services that improve knowledge and basic educational skills. Eligible education services may include:
    - Consumer education;
    - Health education;
    - Substance abuse prevention;
    - Literacy instruction;
    - English as a Second Language (ESL); and
    - General Education Development (GED) preparation.
    - Eligible activities associated with these services may include screening, assessment and testing; individual or group instruction; tutoring; books; supplies; and instructional materials; counseling and referrals to community resources.

e. Employment Assistance and Job Training. ESG funds may be used for employment assistance and job training services for program participants residing in emergency shelters. Eligible services may include classroom, online, computer-based or on-the-job instruction; services that assist program participants in securing employment, developing employment-related skills, or increasing their earning potential. Eligible activities may include:
    - Employment screening, assessment and testing;
    - Job skills and job seeking skills training;
    - Specialized training and tutoring, including literacy and prevocational training;
    - Assistance with obtaining vocational licenses or certificates;
    - Books and instructional materials;
    - Counseling or job coaching; and
    - Referrals to community resources.
    - Reasonable stipends provided to program participants participating in eligible employment assistance and job training programs are also an ESG eligible cost.

f. Outpatient Health Services. ESG funds may be used for the direct outpatient treatment of medical conditions provided by licensed medical professionals. ESG funds may be used for these services only when other appropriate health services are unavailable within the community. Eligible outpatient health services may include:
    - Assessing a program participant's health needs and developing a treatment plan;
    - Assisting program participants in understanding their health needs;
    - Providing or assisting program participants in obtaining appropriate medical treatment, preventive medical care, and health maintenance services, including emergency medical services;
    - Providing medications and follow-up services; and
    - Providing preventive and non-cosmetic dental care.

g. Legal Services. ESG funds may be used for legal advice and representation regarding matters that interfere with a program participant's ability to obtain and retain housing. Services must be provided by an attorney who is licensed and in good standing with the bar association of the state in which the services are provided, or by a person working under the supervision of a licensed attorney. ESG funds may be used for legal services only when other appropriate legal services are unavailable or inaccessible within the community. Eligible legal matters include:
   - Child support;
   - Guardianship;
   - Paternity;
   - Emancipation;
   - Legal Separation;
   - Orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault or stalking;
   - Appeals of veterans and public health benefit claim denials; and
   - Resolution of outstanding criminal warrants.
   - Eligible legal services and costs may include:
   - Client intake;
   - Case preparation;
   - Legal advice and counseling;
   - Representation at hearings;
   - Hourly attorney fees;
   - Filing fees and other necessary court costs; and
   - Fee-for-service arrangements when the cost is less than the cost of providing the services on an hourly basis.
     - If the subrecipient is a legal services provider and provides the services directly, eligible costs may include employee salaries and other costs necessary to provide eligible legal services. ESG funds must not be used for:
     - Legal services related to immigration or citizenship matters;
     - Legal services related to mortgages;
     - Retainer fee arrangements; or
     - Contingency fee arrangements.

h. Life Skills Training. ESG funds may be used for training in critical life management skills that may never have been learned or may have been lost due to physical or mental illness, domestic violence, substance use, or homelessness. Life skills training must be necessary to assist the program participant in functioning independently in the community. Eligible life skills training may include:
   - Budgeting and managing money;
   - Managing a household;
   - Resolving conflicts;
   - Shopping for food and other necessary items;
   - Improving nutrition;
   - Using public transportation; and
   - Parenting skills.

i. Mental Health Services. ESG Shelter funds may be used for the direct outpatient treatment of mental health conditions by licensed professionals. ESG funds may be used for these services only when other appropriate mental health services are unavailable or inaccessible within the community. Mental health services may address personal, family, situational or occupational problems and are intended to improve individual or family functioning or circumstances. Services may address issues such as family and marital relationships, parent-child problems or symptom management. Eligible treatment may include:
   - Crisis intervention;
   - Individual or family or group therapy;
   - Prescription of psychotropic medications;
   - Education regarding the use and management of medications; and
   - A combination of therapeutic approaches to address multiple problems.

j. Substance Abuse Treatment Services. ESG shelter funds may be used for substance abuse treatment services designed to prevent, reduce, eliminate or deter relapsing substance abuse or addictive behaviors. Services must be provided by licensed or certified professionals. ESG funds may be used for these services only when other appropriate substance abuse treatment services are unavailable or inaccessible within the community. Eligible services include:
   - Client intake and assessment;
   - Outpatient treatment for up to 30 days;
   - Individual or group counseling; and
   - Drug testing.
   - Ineligible Services. ESG funds must not be used for inpatient detoxification or other inpatient drug or alcohol treatment.

k. Transportation. ESG funds may be used for transportation costs associated with a program participant's travel to and from medical care, employment, childcare, or other eligible services. Eligible transportation costs include:
   - Public transportation costs for program participants;
   - Mileage reimbursement when service workers use their personal vehicles to visit program participants;
   - Purchase or lease of a vehicle used by the subrecipient to transport program participants and/or staff serving program participants, including gas, insurance, taxes and maintenance; and
   - Staff travel costs when accompanying or assisting program participants using public transportation.

l. Services for Special Populations. ESG funds may be used to provide eligible Emergency Shelter essential services to homeless youth, victims of domestic violence, dating violence, sexual assault or stalking, and people living with HIV/AIDS. The costs of providing these services must otherwise be eligible under the Emergency Shelter essential services described above. Victim services may include services provided by rape crisis centers, domestic violence shelters, and other organizations with a documented history of effectively serving victims of domestic violence, dating violence, sexual assault, or stalking.

m. Renovation. ODOC does not allow ESG funds to be used for the renovation, major rehabilitation, or conversion of buildings used as emergency shelters.
n. Shelter operations. ESG funds may be used for costs necessary to operate an emergency shelter. Eligible shelter operation costs include:
    - Maintenance, including minor or routine repairs;
    - Rent;
    - Security;
    - Fuel;
    - Equipment;
    - Insurance;
    - Utilities;
    - Food;
    - Furnishings; and
    - Supplies.
o. When no appropriate emergency shelter is available for an individual or family experiencing homelessness, ESG funds may also be used for a hotel or motel voucher for that individual or family. Subrecipients must provide a statement documenting the reason the individual or family was placed in a hotel or motel. This documentation must be retained in the applicable program records and available to ODOC during monitoring.
p. Uniform Relocation Assistance (URA). ESG funds may be used for costs associated with providing relocation assistance required under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), in accordance with 24 CFR § 576.408. Eligible costs may include relocation payments and other required assistance to persons displaced by an ESG-assisted project. Persons receiving URA assistance are not considered ESG program participants for purposes of 24 CFR Part 576. URA relocation payments and other assistance are not considered rental assistance or housing relocation and stabilization services under the ESG Program.
q. Prohibition Against Involuntary Family Separation. The age of a child under 18 must not be used as a basis for denying family admission to an emergency shelter that receives ESG funding or services and provides shelter to families with children under 18
r. Minimum Period of Use. When ESG funds are used for Essential Services or Shelter Operations, the subrecipient must provide services or shelter to individuals or families experiencing homelessness for the period during which ESG funds are provided. The services or shelter do not have to be provided at a particular site or structure, provided that the site or structure:
    - Serves the same type of population originally served with ESG assistance, such as families with children, unaccompanied youth, individuals with disabilities or victims of domestic violence; or
    - Serves individuals and families experiencing homelessness in the same geographic area in which the subrecipient originally provided the services or shelter.

s. Long-Term Emergency Shelter. Transitional Housing is not an eligible activity under ODOC's ESG program. However, ODOC may allow an extended length of stay in an emergency shelter when a program participant requires additional time and services to achieve sufficient stability to transition to permanent housing. Applicants proposing extended shelter stays must describe and justify the need for the extended length of stay in the Project Narrative section of the ESG application.
t. Maintenance of Effort. The Maintenance of Effort requirements described under the Street Outreach Component also apply when ESG funds are used for Essential Services under the Emergency Shelter Component. See 24 CFR § 576.101(c).

3. HP Assistance (24 CFR § 576.103) ESG funds may be used to provide housing relocation and stabilization services and short-and/or medium-term rental assistance to prevent an individual or family from becoming homeless. To receive HP assistance, an individual or family must:
    - Meet the criteria under the at risk of homelessness definition in 24 CFR § 576.2; or
    - Meet the criteria in paragraphs (2), (3), or (4) of the homeless definition in 24 CFR § 576.2; and
    - Have an annual income below 30 percent of the Area Median Income (AMI), as determined by HUD.
    - HP assistance must be necessary to help the program participant remain stable in their current permanent housing or move to other permanent housing and achieve stability in that housing. Assistance must be provided in accordance with:
    - Housing Relocation and Stabilization Services requirements at 24 CFR § 576.105;
    - Short-Term and Medium-Term Rental Assistance requirements at 24 CFR § 576.106; and
    - Applicable written standards and procedures established under 24 CFR § 576.400.
4. RRH Assistance (24 CFR § 576.104) ESG funds may be used to provide housing relocation and stabilization services and short-and/or medium-term rental assistance necessary to help an individual or family experiencing homelessness move as quickly as possible into permanent housing and achieve stability in that housing. RRH assistance may be provided to individuals and families who:
    - Meet the criteria in paragraph (1) of the homeless definition at 24 CFR § 576.2; or
    - Meet the criteria in paragraph (4) of the homeless definition and are living in an emergency shelter or another place described in paragraph (1) of the homeless definition.
        - RRH assistance must be provided in accordance with:
        - Housing Relocation and Stabilization Services requirements at 24 CFR § 576.105;
        - Short-Term and Medium-Term Rental Assistance requirements at 24 CFR § 576.106; and
    - Applicable written standards and procedures established under 24 CFR § 576.400.
5. Housing Relocation and Stabilization Services (24 CFR § 576.105)
    a. Financial Assistance. Subject to eligibility and other requirements applicable for HP and RRH, ESG funds may be used to make payments to housing owners, utility

companies, and other third parties for the eligible costs described below. Financial assistance must be paid to the appropriate third party and must not be paid directly to the program participants or provided to a program participant for delivery to the third party. Financial assistance includes:

- Rental Application Fees. ESG funds may be used to pay rental application fees charged by a housing owner to all applicants.
- Security Deposits. ESG funds may be used to pay a security deposit of not more than two months' rent.
- Last Month's Rent. When necessary to obtain housing for a program participant, ESG funds may be used to pay the last month's rent to the housing owner at the time the security deposit and first month's rent are paid. Assistance for the last month's rent must not exceed one month's rent and must be included when calculating the program participant's total rental assistance.
- Utility Deposits. ESG funds may be used to pay the standard utility deposit required by the utility company for all customers. Eligible utilities are gas, electricity, water and sewage services.
- Utility Payments. ESG funds may be used to pay up to 24 months of utility payments for each eligible utility service on behalf of a program participant. Eligible utility services are gas, electricity, water and sewage. Utility assistance may:
    - Up to six (6) months of utility payments in arrears for each eligible utility service;
    - Be provided only when the program participant or a member of the program participant's household has the utility account in their name or has documentation showing responsibility for making the utility payments;
    - Count as a partial payment of a utility bill as one month of assistance; and
    - Must not exceed 24 months of utility assistance for each eligible utility service within any three-year period.
- Moving Costs. ESG funds may be used to pay costs associated with moving a program participant into permanent housing, including truck rental or the cost of hiring a moving company. Moving assistance may also include temporary storage fees for up to three months, provided that:
- The storage fees are incurred after the program participant begins receiving Homelessness Prevention or Rapid Re-Housing assistance; and
- The storage fees are incurred before the program participant moves into permanent housing.
    - ESG funds must not be used to pay temporary storage fees in arrears.
    - Emergency Transfer Costs. ESG funds may be used to pay amounts owed for breaking a lease when a program participant receiving short- or medium-term rental assistance under 24 CFR § 576.106 meets the requirements for an emergency transfer under 24 CFR § 5.2005(e). Eligible costs must be necessary to carry out the emergency transfer. These costs are not subject to the 24-month limit on rental assistance under 24 CFR § 576.106.

b. Services. Subject to the eligibility and other requirements applicable to Homelessness Prevention and Rapid Re-Housing, ESG funds may be used to pay the costs of providing the eligible services described below:
   - Housing Search and Placement. ESG funds may be used for services and activities necessary to help program participants locate, obtain, and retain suitable permanent housing. Eligible activities include:
   - Assessing housing barriers, needs and preferences;
   - Developing an action plan for locating housing;
   - Conducting housing searches;
   - Conducting outreach to and negotiating with housing owners;
   - Assisting program participants with completing rental applications and understanding leases;
   - Assessing housing for compliance with applicable ESG requirements, including physical condition standards, lead-based paint requirements and rent reasonableness;
   - Assisting program participants with obtaining utilities and making moving arrangements; and
   - Providing tenant counseling.

c. Housing Stability Case Management. ESG funds may be used for housing stability case management to assess, arrange, coordinate and monitor individualized services that help a program participant:
   - Overcome immediate barriers to obtaining permanent housing;
   - Maintain stability while living in permanent housing;
   - Housing stability case management may be provided for:
     - Up to 30 days while the program participants are seeking permanent housing; and
     - Up to 24 months while the program participant is living in permanent housing.
   - Eligible housing stability case management activities include:
     - Using the applicable Coordinated Entry system, as required by 24 CFR § 576.400(d), to evaluate individuals and families applying for or receiving Homelessness Prevention or Rapid Re-Housing assistance;
     - Conducting the initial evaluation required by 24 CFR § 576.401(a), including verifying and documenting program eligibility;
     - Providing counseling;
     - Developing, securing, and coordinating services and assisting program participants with obtaining Federal, State, and local benefits;
     - Monitoring and evaluating program participant progress;
     - Providing information and referrals to other service providers;
     - Developing an individualized housing and service plan, including a plan for achieving permanent housing stability; and
     - Conducting the re-evaluations required by 24 CFR § 576.401(b).

d. Mediation. ESG funds may be used to pay for mediation between a program participant and the housing owner or other person with whom the program

participant is living when the mediation is necessary to prevent the program participant from losing their current permanent housing.

e. Legal Services. ESG funds may be used to pay for eligible legal services described under the Emergency Shelter component, including legal services related to landlord-tenant matters. The legal services must be necessary to resolve a legal problem that:
   - Prevents the program participant from obtaining permanent housing; or
   - Is likely to result in the program participants losing their current permanent housing.
   - See 24 CFR § 576.102(a)(1)(vi) for applicable Legal Services requirements.

f. Credit Repair. ESG funds may be used to pay for credit counseling and other services that help program participants develop skills necessary to address credit and financial barriers to obtain or maintain permanent housing. Eligible services may include assistance with:
   - Household budgeting;
   - Money management;
   - Accessing a free personal credit report; and
   - Resolving personal credit problems.
   - ESG funds must not be used to pay or modify program participants' debt.

g. Maximum Amounts and Periods of Assistance. ODOC may establish a maximum dollar amount that a program participant may receive for each type of financial assistance and may establish a maximum period for which a program participant may receive financial assistance or services under this section. Except for Housing Stability Case Management, a program participant may receive services under this section for no more than 24 months during any three-year period. The limits under this section apply to the total assistance an individual receives, whether received as an individual or as a part of a family.

h. Use with Other Subsidies. Financial assistance must not be provided to a program participant who is receiving the same type of assistance from another public source for the same period. Financial assistance also must not be provided during a period for which the program participant has received replacement housing payments under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA).

i. Housing Counseling. Housing counseling, as defined in 24 CFR § 5.100, that is funded with or provided in connection with ESG funds, must comply with the housing counseling requirements at 24 CFR § 5.111. Housing services that are incidental to broader case management services provided to eligible program participants are not considered housing counseling and are not subject to the housing counselor certification requirements at 24 CFR § 5.111.

6. Short-Term and Medium-Term Rental Assistance (24 CFR § 576.106).
   a. Subject to the eligibility and other requirements applicable to HP and RRH, ESG funds may be used to provide short-term rental assistance, medium-term rental assistance, payment of rental arrears, or a combination of these types of assistance. A program participant may receive no more than 24 months of rental assistance during any three-year period. Eligible rental assistance includes:

- Short-Term Rental Assistance. Up to three months of rent;
- Medium-Term Rental Assistance. More than three months, but no more than 24 months of rent;
- Rental Arrears. A one-time payment of up to six months of rent in arrears, and including late fees associated with those arrears.
- ODOC does not allow ESG funds to be used for project-based rental assistance. Rental assistance funded through ODOC's ESG program must be tenant-based.

7. ODOC-Established Caps and Conditions. ODOC has not established additional rental assistance caps or participant cost-sharing requirements beyond those otherwise identified in this Manual.
8. Use With Other Subsidies. ESG rental assistance must not be provided to a program participant who:
    - Is receiving tenant-based rental assistance from another public source;
    - Lives in a housing unit receiving project-based rental assistance or operating assistance from another public source; or
    - Has received replacement housing payments under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA).
    - **Exception**: ESG funds may be used for a one-time payment of rental arrears for the program participant's portion of the rent, even when the program participant is receiving another public rental subsidy.
9. Rent Restrictions. When ESG funds are used for rental assistance, the unit must meet the following requirements:
    - The rent must not exceed the applicable HUD Fair Market Rent (FMR); and
    - The rent must meet HUD's rent reasonableness requirements.
    - ESG rental assistance must not be provided for a unit that fails either the FMR or rent reasonableness requirement, even when non-ESG funds are available to pay the amount above the applicable limit.
    - Calculating Rent. For purposes of determining compliance with these requirements, rent includes:
    - The total monthly rent for the unit;
    - Any fees required for occupancy under the lease, excluding late fees and pet fees; and
    - When utilities are paid separately by the tenant, the applicable monthly utility allowance established by the Public Housing Authority (PHA) for the area in which the housing is located.
    - Telephone costs are not included.
10. Rental Assistance Agreement. Before making rental assistance payments, the subrecipient must enter into a written Rental Assistance Agreement with the housing owner.
    a. Subrecipients must use the Rental Assistance Agreement form provided by ODOC as part of the required ESG standard documentation. This agreement establishes:
        - Terms and conditions under which ESG assistance will be provided;
        - Include the applicable ESG rental assistance requirements; and
        - A requirement that the housing owner is to provide the subrecipient with a copy of any notice given to the program participant to vacate the unit or any

complaint filed under State or local law to begin an eviction action against the program participant.
    - ESG rental assistance payments must not be made to a housing owner unless a Rental Assistance Agreement is in effect.
b. VAWA Requirements. The Rental Assistance Agreement must include the applicable protections for tenants and applicants under VAWA, as required by 24 CFR Part 5, Subpart L and 24 CFR § 576.409. When the housing is not assisted under another covered housing program, as defined at 24 CFR § 5.2003, the agreement may provide that the housing owner's obligations under 24 CFR Part 5, Subpart L expire when the ESG rental assistance period ends. The emergency transfer plan requirements at 24 CFR §§ 5.2005(e) and 576.409(d) are not required to be incorporated into the Rental Assistance Agreement.
c. Late Payments. Subrecipients must make rental assistance payments to housing owners on time and in accordance with the applicable Rental Assistance Agreement.
    - The Rental Assistance Agreement must include the same payment due date, grace period and late-penalty requirements contained in the program participant's lease.
    - Late-payment penalties incurred because the subrecipient fails to make a rental assistance payment on time must be paid with non-ESG funds. This restriction does not apply to eligible late fees associated with a program participant's rental arrears, as described under Rental Arrears above.
d. Lease Requirements. Each program participant receiving ESG rental assistance must have a legally binding written lease for the assisted rental unit. The lease must:
    - Be between housing owner and the program participant; and
    - Have a term of at least 30 days.
e. Exception: Rental Arrears only. When ESG assistance is provided solely for rental arrears, an oral rental agreement may be accepted instead of a written lease if:
    - The oral agreement provides the program participants with an enforceable leasehold interest under Oklahoma law; and
    - The rental agreement and amount of rent owed are adequately documented through the housing owner's financial records, rent ledger, canceled checks, or other sufficient documentation.
    - VAWA Lease Requirements. The lease must include, or incorporate through a lease addendum, all applicable tenants, housing owner, and lease protections required under 24 CFR Part 5, and Subpart L and 24 CFR § 576.409, including applicable VAWA protections related to eviction and lease terms. When the housing is not assisted under another covered housing program, as defined at 24 CFR § 5.2003, the VAWA lease provision or addendum may provide that these requirements expire at the end of the ESG rental assistance period

11. Tenant-Based Rental Assistance. A program participant receiving tenant-based rental assistance may select the housing unit in which they will live. The program participant may move to another eligible unit and continue receiving rental assistance as long as they continue to meet ESG program requirements. ODOC may establish geographic limitations on where program participants may live while receiving ESG rental assistance.

12. Termination of Rental Assistance Agreement. The Rental Assistance Agreement with the housing owner must terminate, and no additional rental assistance payment may be made under that agreement, when:
    - The program participant moves out of the unit covered by the lease;
    - The lease terminates and is not renewed; or
    - The program participant is no longer eligible to receive ESG rental assistance.
13. Project-Based Rental Assistance. ODOC does not allow ESG funds to be used for project-based rental assistance.
14. Changes in Household Composition. The rental assistance limits under this section apply to the total assistance an individual receives, whether received as an individual or as part of a family.
15. HMIS Component 24 CFR § 576.107
    a. Eligible HMIS Costs. ESG funds may be used for reasonable costs associated with contributing required ESG data to the HMIS designated by the Continuum of Care (CoC) for the area. Eligible costs may include:
        - Purchasing or leasing computer hardware;
        - Purchasing software or software licenses;
        - Purchasing or leasing equipment, including telephones, fax machines, and furniture;
        - Obtaining technical support;
        - Leasing office space;
        - Paying utilities and communication costs necessary to operate or contribute data to HMIS, including electricity, gas, water, telephone service, and high-speed data transmission;
        - Paying staff salaries associated with:
            - Data entry;
            - Monitoring and reviewing data quality;
            - Data analysis;
        - Reporting to the HMIS Lead;
        - Training staff to use HMIS or an applicable comparable database; and
        - Implementing and complying with HMIS requirements;
        - Staff travel and attendance costs for HUD-sponsored or HUD-approved training related to HMIS and programs authorized under Title IV of the McKinney-Vento Homeless Assistance Act;
        - Staff travel costs associated with conducting program participant intake; and
        - HMIS participation fees charged by the HMIS Lead.
            - The HMIS lead is the entity designated by the CoC to operate the HMIS for the CoC's geographic area.
    b. Comparable Database – Victim and Legal Service Providers. VSPs and legal service providers that are prohibited from entering client-level data into HMIS may use ESG funds to establish and operate a comparable database that collects client-level data and generates unduplicated aggregate reports. Client-level information that is entered into a comparable database must not be entered directly into or provided to HMIS.

c. General HMIS Requirements. All HMIS activities funded with ESG must comply with applicable HUD requirements for HMIS participation, data collection, data quality, privacy, security and reporting.

16. Administrative Activities (24 CFR § 576.108)
    a. Administrative Cost Limit. Subrecipients may use up to 3.75 percent of their total ESG award for eligible administrative costs associated with planning and carrying out ESG activities. Staff and overhead costs directly related to carrying out eligible ESG activities under 24 CFR §§ 576.101 through 576.107 are not administrative costs. Those costs may be charged to the applicable ESG activity when otherwise eligible.
    b. Eligible Administrative Costs. ESG eligible administration costs include General Management, Oversight, and Coordination. Costs associated with overall ESG program management include:
        - Coordination, monitoring and evaluation. This may include staff salaries, wages, and related costs associated with:
        - Preparing program budgets, schedules and amendments;
        - Developing systems to ensure compliance with ESG requirements;
        - Developing agreements necessary to carry out ESG activities;
        - Monitoring program activities for progress and compliance;
        - Preparing required ESG reports and program documents;
        - Resolving audit and monitoring findings;
        - Evaluating program results against established objectives; and
        - Managing or supervising staff whose primary responsibilities include ESG program administration;
        - Travel costs associated with monitoring ESG-funded activities;
        - Administrative services provided through third party contracts or agreements, including general legal, accounting and audit services;
        - Costs necessary for ESG administration, including equipment, insurance, utilities, office supplies, and the rental and maintenance of office space. The purchase of office span is not an eligible administrative cost;
        - Costs of providing training on ESG requirements an attending HUD or ODOC sponsored ESG training; and
        - Costs of preparing and amending the ESG and homelessness related portions of the Consolidated Plan, in accordance with ESG requirements and 24 CFR Part 91.

Requirement 704
Performance Measures
Effective October 1, 2026

Requirement

ESG subrecipients must select and track at least two of the four State Performance Measures identified in Part II. A of this requirement. Subrecipients must select the measure that best aligns with their ESG-funded activities, organizational performance measure, and applicable CoC goals.

Performance measures are established during the application process and must be used to evaluate program performance and progress toward identified outcomes.

Subrecipients may establish and track additional local performance measures; however, local measures do not replace the requirement to track at least two State Performance Measures.

Victim Service Providers must collect and track the required performance measure data in their comparable database.

ODOC will review performance measures during monitoring. Subrecipients must report final performance measure results as part of the program year closeout.

Procedures

1) Subrecipients must select and track at least two of the following four State Performance Measures:
   a. Permanent Housing Exits – Programs Other Than HP. Number of persons who exit an ESG-funded program, other than HP, to permanent housing. CAPER Source: 23C, Permanent Destinations Subtotal.
   b. Permanent Housing Exits – Homelessness Prevention. Number of persons receiving Homelessness Prevention assistance who exit to permanent housing. CAPER Source: 24, Homelessness Prevention Housing Assessment at Exit. Add the first six rows of the Total column.
   c. Total Persons Served. Total number of persons served through the ESG-funded program. CAPER Source: 5A, Total Number of Persons Served, Count of Clients column.
   d. Persons With Income at Exit or End of Grant Year. Total number of persons with income at program exit or at the end of the grant year. CAPER Source: 16. Add the amounts in the applicable income rows, beginning with $1-$150 through $2001+, from the Income at Latest Annual Assessment for Stayers and Income at Exit for Leavers column.
2) Performance Measure Tracking and Reporting
   a. Establish Performance Goals. Performance goals are established during the ESG application process. For each selected State Performance Measure, the subrecipient must establish a measurable performance target. Subrecipients that establish additional local performance measures must explain in the application how those measures support achievement of the applicable State Performance Measures.
   b. Track and Evaluate Performance. For each selected performance measure, the subrecipient must:
      - Clearly identify the performance indicator;
      - Establish a measurable target;

- Identify how progress toward the target will be measured;
- Track performance using quantitative data, such as numbers or percentages;
- Report progress to ODOC during monitoring and at grant closeout; and
- Identify unmet targets and actions that will be taken to improve future performance.

c. Performance Period. Performance measures must be tracked for a 12-month period. The ESG contract period, October 1 through September 30 should be used as the performance period.
d. ODOC Review and Final Reporting. ODOC will review performance measure tracking and progress during monitoring. Final performance results must be reported in the ESG Closeout Report at grant year end.
e. When a performance target is not met, the subrecipient must identify the unmet target and describe actions that will be taken to improve future performance.

3) Data Sources. Subrecipients should use the applicable HMIS and Point-in-Time (PIT) data when establishing tracking and evaluating performance measures. Victim Service Providers must use their comparable database in place of HMIS for client-level data.
4) Required ODOC Form. Subrecipients must use the ODOC Performance Measures form to establish, track and report the State Performance Measures required under this section. The form contains space for local performance measures, if established. The completed form must be submitted to ODOC in its original Excel format (xlsx) and must not be converted to PDF.
5) Performance Measure Terms:
   - Output: A measurable activity or service delivered by the program, such as the number of persons served.
   - Outcome: A measurable change or result associated with program services, such as a permanent housing destination or increased income.
   - Performance Target: The numeric or percentage goal established for a performance measure.

Requirement 705
Financial Management Standards
Effective October 1, 2026

Requirement

Subrecipients must maintain a financial management system that provides effective control and accountability over ESG funds and ensures compliance with applicable Federal and State requirements.

Financial management and recordkeeping must comply with 2 CFR Part 200, applicable State requirements and generally accepted accounting principles (GAAP).

Procedures

1) Financial Management. Subrecipients must maintain financial management systems that properly account for ESG funds and required matching funds, and meet the following standards:
   a. Financial Reporting. Financial records must provide accurate, current and complete information regarding the financial activity of the ESG program.
   b. Source and Use of Funds. Financial records must clearly identify the source and use of ESG funds for each funded activity, including applicable match funds.
   c. Internal Controls. Subrecipients must establish and maintain effective internal controls to safeguard funds and ensure compliance with Federal, State and ESG requirements.
   d. Subrecipients must use the ODOC Internal Controls form required under this section. The completed form must be submitted to ODOC in its original Excel format (xlsx) and must not be converted to PDF.ODOC will review the form and implementation of the identified internal controls during monitoring.
   e. Reimbursement. ESG funds are provided on a reimbursement basis. Subrecipients must incur eligible costs before requesting reimbursement and must submit the required supporting documentation with each reimbursement claim submitted to ODOC.
2) Accounting System. Subrecipients must maintain an accounting system that separately identifies and tracks ESG funds and required matching funds. Financial records must allow ESG revenues and expenditures to be traced to the applicable grant, eligible activity and approved budget category.
   a. Accounting Records and Source Documentation. Accounting records must accurately document ESG and matching fund transactions and must be supported by appropriate source documentation, such as invoices, receipts, contracts, payroll records, timesheets and other applicable documentation.
   b. Expenditure Review and Approval. ESG and matching fund expenditures must be reviewed for accuracy, allowability, and appropriate authorization in accordance with the subrecipient's established internal control procedures. Documentation of required review and approval must be maintained.
   c. Payment Controls. Subrecipients must maintain appropriate controls over checks, electronic payments, and other methods of disbursement. Payments must be properly authorized, supported by appropriate documentation, and protected from unauthorized use or alteration.

d. Payroll Records. Subrecipients must maintain appropriate payroll and time-and-effort documentation for employees whose compensation is charged to ESG or reported as ESG match.
e. Bank Reconciliation. Bank accounts associated with ESG financial activity must be reconciled regularly. To the extent practicable, bank reconciliations should be performed or independently reviewed by an individual who does not initiate or record the related transactions. Documentation of the reconciliation and review must be maintained.

3) Matching Funds — 24 CFR §§ 576.201 and 576.500
   a. ESG matching expenditures must be reported and tracked with each monthly Reimbursement Claim.
   b. At all times, the total cumulative match expenditures must equal or exceed the total cumulative ESG expenditures reported to ODOC.
   c. Matching expenditures may be incurred and reported before the corresponding ESG expenditures and may exceed the amount of ESG expenditures.
   d. Subrecipients must identify the source and amount of proposed matching contributions on the required ODOC Match Certification form in OGX during the application process.
   e. Matching contributions:
      - May be cash or noncash;
      - The fair rental value of a building or space used for eligible ESG activities;
      - Donated materials, equipment, goods, or services that would be allowable ESG costs if purchased with ESG funds;
      - Eligible staff salaries paid with non-ESG funds;
      - Volunteer services, valued at rates consistent with those ordinarily paid for similar work;
      - Donated buildings. The value of a building donated for long-term use in the ESG Program may qualify as match in accordance with 4 CFR § 576.201(c). When a building is donated by a third party, eligible match may include either:
        - Depreciation of the building and fair rental charges for the land for each year the building is used in the ESG program.
        - When the building is donated for long-term use in the ESG Program, the applicable fair market value of the capital asset.
   f. A building donated for long-term ESG use must be supported by a recorded deed or use restriction effective for at least 10 years after the date of donation. Depreciation must also not be counted as match or charged to another Federal award when the value of the donated building is counted as ESG match.
      - Must be used for costs that are eligible under the ESG Program;
      - Are not subject to the ESG expenditure limits at 24 CFR § 576.100; and
      - Must not be counted as match for another Federal program when prohibited by that program or when the ESG funds are being counted as match for that program.
   g. Tracking and Reporting Match. Matching contributions must be tracked and reconciled monthly and reported on the monthly reimbursement claim form submitted to ODOC.
   h. Valuation and Documentation of Match. Subrecipients must maintain sufficient records to identify and document all matching contributions. Documentation must include:
      - The ESG grant year for which the contribution is counted;
      - The source, amount and use of the matching contribution;
      - Documentation supporting the value assigned to noncash contributions; and

- Documentation demonstrating that the contribution was used for an eligible ESG cost.
- The value assigned to donated materials, buildings or leases must be determined using a method reasonably calculated to establish fair market value.
- Donated services must be valued at rates consistent with those ordinarily paid for similar work.
- When funds from another Federal program are used as ESG match, the funds must comply with the requirements of both the other Federal program and the ESG program.
- Matching funds and expenditures must be included in the subrecipients' applicable annual audit.
- Costs paid with program income may be counted toward the ESG matching requirement when the costs are eligible ESG costs that supplement the subrecipient's ESG program.

4) Financial Reporting Requirements
   a. Monthly Reimbursement Claims. Subrecipients must submit a Reimbursement Claim through OGX by the 20th day of the month following the month in which the expenses were incurred. For example, expenses incurred in January must be reported by February 20th. A Reimbursement Claim is required each month, even when no ESG expenses are incurred. If the 20th falls on a Saturday, Sunday or a Federal or State holiday, the Reimbursement Claim is due by 11:59 p.m. on the next business day. Each Reimbursement Claim must include required supporting documentation and reporting matching expenditures in accordance with the matching requirements of this manual.
   b. Required Supporting Documentation. The following must be uploaded with each applicable Reimbursement Claim in OGX:
      - ESG General Ledger: A general ledger showing total expenditures for applicable ESG activity, including Administration, HMIS, Street Outreach, Emergency Shelter, RRH and/or HP.
      - ESG Detailed General Ledger: A detailed general ledger showing individual ESG expenditures; and
      - Program Progress Report (CAPER Report): Applicable HMIS-generated or comparable database reports for VSPs, showing activity for Street Outreach, Emergency Shelter, RRH and/or HP.
   c. Budget Revisions are done only when necessary and must be submitted through OGX. Instructions for submitting a budget revision are available on ODOC's OGX Resource Page.
   d. Program Reporting. In addition to the financial reporting requirements described above, subrecipients must submit all required ESG program reports during the grant period, including:
      - Monthly program progress reports (CAPER reports);
      - Semi-Annual Reports; and
      - The Closeout Performance Report.
      - See Requirement 710 — Reporting Requirements for applicable reporting procedures, due dates and required documentation.
   e. Returned Submissions to Subrecipients. ODOC will return submissions containing errors or requiring corrections to the Subrecipient through OGX. Such submission may include reimbursement claims, budget revisions and other applicable documents. The

Subrecipient shall correct all identified errors and resubmit the documents through OGX within ten (10) business days of the date the submission was returned by ODOC. If the corrected submission is not received within the ten (10) business day period, ODOC will cancel the submission. The Subrecipient will then be required to initiate a new submission through OGX, as applicable.

5) Property Controls. [2 CFR 200.312 AND 2 CFR 200.313] Subrecipients must maintain adequate control over equipment and other property acquired as a whole or in part when such purchases are made with ESG funds. Property must be properly recorded, safeguarded, maintained and used only for authorized purposes.
   a. Property Management. Subrecipients must maintain property management procedures that address the acquisition, use, safeguarding, maintenance, inventory and disposition of property acquired with ESG funds.
   b. Inventoriable ESG Property records must include records for all property valued at over $500 and all computer equipment purchased with ESG funds, regardless of value. Property records must include, as applicable:
      - A description of the property and serial number or other identifying number;
      - Source of funding, including the Federal Award Identification Number (FAIN);
      - Entity holding the title;
      - Acquisition date and cost;
      - Federal share of the acquisition cost;
      - Location, use and condition of the property; and
      - Disposition information, including the date and method of disposition and applicable sale proceeds.
      - A physical inventory must be conducted and reconciled with property records at least once every two years.
      - Subrecipients must maintain controls to prevent loss, damage, theft, or unauthorized use of property. Any loss, damage, or theft must be investigated and documented.
      - Property must be adequately maintained and kept in good condition.
   c. Subrecipients must obtain written disposition instructions from ODOC before disposing of vehicles, equipment or supplies purchased with ESG funds when ODOC approval or Federal disposition requirements apply.
   d. Use of ESG-Funded Equipment. Equipment acquired with ESG funds must be used for the ESG program or activity for which it was acquired for as long as the equipment is needed for that purpose. When the equipment is no longer needed for its original purpose, it may be used for other eligible Federally supported activities in accordance with 2 CFR § 200.313.
   e. Vehicle Usage. Subrecipients that purchase a vehicle with ESG funds must maintain documentation demonstrating that the vehicle is used for authorized purposes. Subrecipients must use the ODOC Agency Vehicle Tracking Spreadsheet to document vehicle use.
   f. Disposition of ESG-Funded Equipment (2 CFR § 200.313(e)). When equipment acquired in whole or in part with ESG funds is no longer needed for its original purpose or other Federally supported activities, the subrecipient must follow applicable Federal and ODOC disposition requirements, which include:

- Equipment with a current per-unit fair market value of $10,000 or less may be retained, sold or otherwise disposed of with no further Federal responsibility, unless otherwise required by ODOC or the terms and conditions of the award.
- Equipment with a current per-unit fair market value greater than $10,000, the subrecipient must request disposition instructions from ODOC before disposing of the equipment.
- Subrecipients must follow any disposition instructions provided by ODOC and maintain documentation of the final disposition.
- Property and equipment records must be updated to reflect the disposition.

g. Record Retention. Records for real property and equipment acquired with Federal funds must be retained for three years after final disposition, in accordance with 2 CFR § 200.334(c).

6) Mileage Reimbursement Rate
   a. Mileage costs charged to ESG must not exceed the current IRS standard mileage rate for business use.
7) Personnel Record Keeping Requirements This section applies when ESG funds or ESG matching funds are used to pay any portion of an employee's personnel costs. Subrecipients must maintain personnel and payroll records sufficient to support all personnel costs charged to ESG or reported to ESG as match. Applicable records must include:
   - Time and Effort Records. Timesheets or other records documenting time worked and identifying the time attributable to the ESG Programs and applicable ESG activities.
   - Leave Records. Records documenting employee leave and other absences. Electronically maintained records must be made available to ODOC upon request.
   - Personnel File Documentation. Personnel files must include applicable employee documentation including the employee's current job description, employment application, and documentation of pay rates and adjustments.
   - Job Descriptions. Job descriptions must accurately describe the employee's actual duties and responsibilities. General descriptions such as "case management" are not sufficient when additional detail is necessary to demonstrate the employee's ESG-related responsibilities.
   - Acknowledgement of Requirements. Employees must acknowledge receipt of applicable agency policies and program requirements related to their assigned responsibilities.
   - Employee Evaluations. Documentation of required employee performance evaluation must be maintained in accordance with the subrecipients personnel policies.
   - Subrecipients must maintain written personnel policies and procedures addressing, as applicable, travel, employee evaluations, job descriptions, grievance procedures, leave, fringe benefits, employee conduct and general personnel and office procedures.
8) Leave
   a. When personnel costs, including paid leave, are charged to ESG or reported as ESG match, the subrecipient must maintain established written leave policies. Leave costs must be allocated and documented in accordance with the subrecipient's established policies and applicable Federal cost principles, including 2 CFR § 200.431. That regulation requires allowable paid leave to be provided under established written leave policies and allocated equitably to applicable activities, including Federal awards.

b. Inclement Weather and Safety. Subrecipients must follow their established personnel policies and procedures when determining employee leave, work status or other personnel actions resulting from inclement weather or safety conditions.

9) Hotel/Motel Vouchers Hotel or motel vouchers may be provided under 24 CFR § 576.102(a)(3) when no appropriate emergency shelter is available to the program participant.
   a. Documentation. The subrecipient must maintain documentation in the program participant's client file demonstrating that no appropriate emergency shelter was available at the time the hotel or motel voucher was provided. Fiscal records must support the related ESG expenditure.
   b. Policies and Procedures. Subrecipients providing hotel or motel vouchers must maintain written policies and procedures describing how eligibility for hotel or motel assistance is determined, documented, approved and provided.
10) Memorandum of Understanding (MOU) and Subcontract agreements
   a. Subrecipients must maintain written policies and procedures describing when Memoranda of Understanding (MOUs) and subcontract agreements are used in carrying out the ESG program.
   b. Memoranda of Understanding. An MOU may be used to document the roles, responsibilities, coordination, or services agreed upon between the subrecipient and another organization or entity.
   c. Subcontract Agreements. A subcontract agreement is a written agreement under which another organization or individual performs specified services or activities on behalf of the ESG subrecipient.
11) Subcontracting. ESG-funded work or services may be subcontracted only with prior written approval from ODOC. The ESG subrecipient remains responsible for ensuring that the subcontracted activities comply with applicable ESG requirements and the terms and conditions of the ESG contract. At a minimum, subcontract agreements must include:
   - Effective dates of the agreement;
   - Legal names and contact information of the parties'
   - Description and scope of the agreement;
   - Roles and responsibilities of each party;
   - Description of services or activities to be performed;
   - Compensation or fees, including a statement when no compensation or fees will be paid;
   - Applicable ESG and other compliance requirements;
   - Applicable recordkeeping and documentation requirements;
   - Performance timelines and applicable due dates; and
   - Names, signatures, titles, and dates of the authorized representatives of each party.
12) Audits Subrecipients must comply with the applicable audit requirements established by the ODOC Audit Policies and Procedure Manual, Oklahoma law, and 2 CFR Part 200, Subpart F, as applicable.
   a. Audit requirements are as follows:
      - Private Nonprofit Organizations. Private nonprofit subrecipients must comply with applicable ODOC and Oklahoma audit requirements. When an audit is required and the organization receives funds administered by ODOC, the required audit report must be submitted to ODOC.

- Federal Single Audit. A subrecipient that expends $1,000,000 or more in Federal awards during its fiscal year must obtain a Single Audit or program-specific audit, as applicable, in accordance with 2 CFR Part 200, Subpart F.
- Units of General Local Government. UGLGs must comply with applicable Oklahoma statutory audit requirements and the ODOC Audit Policies and Procedures Manual.

b. Submission of audit reports. Required audit reports must be submitted to ODOC within the timeframe established by applicable Federal and State requirements and the ODOC Audit Policies and Procedures Manual. For audits subject to 2 CFR Part 200, Subpart F, the applicable reporting package must be submitted within the earlier of 30 calendar days after receipt of the auditor's report or nine months after the end of the audit period.

c. Late or outstanding audits. When the required audit is late, the subrecipient must notify ODOC and provide documentation explaining the reason for the delay and the anticipated date of completion. ODOC may require additional documentation, technical assistance, corrective action or compliance plan, or special contract conditions when an audit is late or remains unresolved. Late or unresolved audits may result in ODOC withholding or restricting reimbursement or access to ESG funds, consistent with applicable requirements and the terms and conditions of the award.

13) ESG Matching funds.
   a. ESG matching funds are a contractual requirement and must be appropriately reflected and supported in the subrecipient's financial records and audit documentation, as applicable.

14) ODOC Spending Requirements
   a. In addition to the federal expenditure requirements applicable under 24 CFR § 576.203, ODOC requires subrecipients to meet the following State program expenditure milestones:
   b. At least 50% of the ESG award must be expended within the first six months of the contract period.
   c. At least 75% of the ESG award must be expended within the first nine months of the contract period.
   d. 100% of the ESG award must be expended by the end of the 12-month contract period.
   e. Failure to meet the required spending milestones may result in the recapture and redistribution of ESG funds in accordance with ODOC requirements. Matching funds are not included when calculating compliance with these spending requirements.

15) Recapture and Redistribution
   a. ODOC may recapture ESG funds when a subrecipient does not meet applicable spending, obligation, programmatic, financial or other ESG requirements. Recaptured funds may be redistributed within the applicable CoC service area based on the capacity of other eligible subrecipients to use the funds, serve the applicable service area, and meet ESG programmatic and financial requirements.
   b. Recapture of Unobligated Funds. ESG funds may be subject to recapture and redistribution when unobligated funds exceed 20% of the amount distributed to the subrecipient during the contract year.
   c. Documentation of Obligated Funds. For purposes of determining whether ESG funds are obligated, the subrecipient must maintain documentation demonstrating a commitment of funds for an eligible ESG cost. Documentation may include, as applicable:
      - Memoranda of Understanding or other written agreements;

- Service contracts;
- Purchase or service orders;
- Written agreements or commitments for eligible rent or utility assistance;
- Signed agreements documenting approved financial assistance for eligible program participants; and
- Documented personnel costs budgeted to the ESG award.

d. Recapture for Noncompliance. If ODOC determines that a subrecipient is not complying with its ESG contract, this Implementation Manual, or other applicable requirements, ODOC may take appropriate action, including:
   - Issuing written notice of the noncompliance and required corrective action;
   - Directing the subrecipient to stop incurring additional costs against the ESG award;
   - Withholding or restricting reimbursement, as applicable; or
   - Recapturing some or all ESG funds.

e. Redistribution of Recaptured Funds. When ESG funds are recaptured, ODOC may make the funds available to other eligible subrecipients within the applicable Continuum of Care service area. Redistribution will be based on factors including the subrecipient's ability to use the additional funds within the grant period, serve the applicable service area, and meet ESG programmatic and financial requirements.

16) SAM.GOV – Suspension and Debarment (2 CFR § 200.214; 2 CFR Part 180)
   a. Subrecipients must not use ESG funds for covered transactions with parties that are suspended, debarred, or otherwise excluded from participation in applicable Federal programs or activities.
   b. Verification. Before entering into an applicable contract or other covered transaction, the subrecipient must verify that the proposed contractor or other party is not excluded from participation in Federal programs. Verification may be completed by searching for the party's exclusion status in SAM.gov using identifying information such as the entity's legal business name or Unique Entity Identifier (UEI), as applicable. SAM.gov maintains Federal entity and exclusion information.
   c. Documentation. The subrecipient must maintain documentation demonstrating that the required exclusion verification was completed before entering the covered transaction. Documentation must be made available to ODOC upon request and will be reviewed as applicable during monitoring.

Requirement 706
Procurement Requirements
Effective October 1, 2026

Requirement

Subrecipients must follow their established procurement policies and procedures and comply with all applicable Federal, State and ODOC procurement requirements, including 2 CFR Part 200, as applicable. When multiple procurement requirements apply, the subrecipient must comply with all applicable requirements.

ODOC requires a competitive procurement process for purchases made with ESG funds, regardless of the dollar amount. Subrecipients must follow the applicable procurement method and documentation requirements established in this section.

Procedures

1) Suspension and Debarment (SAM.gov)
   a) Subrecipients must ensure that contractors and vendors used in applicable ESG-funded transactions are not suspended, debarred or otherwise excluded from participation in Federal programs or activities, in accordance with applicable Federal requirements, including 2 CFR Part 180.
      i) ESG Applicants. All ESG applicants must maintain an active SAM.gov registration and must not be suspended, debarred, or otherwise excluded from participating in Federal programs. As part of the ESG application, applicants must submit the SAM.gov downloadable PDF Search Verification of Non-Debarred Status.
      ii) Contractors and Vendors. Subrecipients must verify that contractors and vendors used in applicable ESG-funded transactions are not suspended, debarred or otherwise excluded from participation in Federal programs or activities. This information will be verified at monitoring.
2) Procurement Methods and Purchase Thresholds
   a) Subrecipients must use the applicable procurement method based on the total cost of the purchase and must maintain documentation supporting the procurement and vendor selection.
      i) Small Purchase Procedures. For purchases of less than $10,000, subrecipients must obtain and document price or rate comparisons as follows:
         - $1000 or less: Informal price comparison.
         - $1001 through $2500: Obtain at least three price quotations. Quotes may be obtained verbally, by telephone, by email, or from a vendor's website and must be documented in the procurement file.
         - $2500 through $9,999: Obtain at least three documented price quotations. Quotations may be obtained in writing, by email, or from a vendor's publicly available website. Documentation must identify the vendor, quoted price, applicable specifications, and the date the quote was obtained.
3) Procurement documentation must identify the vendors contacted, prices or rates quoted, applicable specifications or scope of the purchase, and the basis for vendor selection.

a) Vendor Selection. Subrecipients must document the basis for selecting the successful vendor. When the lowest responsive quote or bid is not selected, the procurement file must document the reason for selecting another vendor.
b) Insufficient Competition. If only one responsive quote or bid is received when competition is required, the subrecipient should make reasonable additional efforts to obtain competition. If adequate competition cannot be obtained, the subrecipient must obtain written approval from ODOC before proceeding with the single responsive quote or bid. The request to ODOC must describe the procurement, efforts made to obtain competition, results of those efforts, and the reason the subrecipient is requesting approval to proceed.
c) Other deviations from the procurement requirements established in this section require prior written approval from ODOC.
d) Advertised/Public Solicitation Procedure. For purchases of $10,000 or more, subrecipients must publicly solicit competitive bids. Solicitations must adequately describe the goods or services being procured, applicable specifications, the deadline and procedures for submitting bids, and how potential bidders may obtain additional information. Public solicitation may be conducted through a newspaper of general circulation, publicly accessible websites, listservs, electronic procurement platforms, or other methods reasonably designed to reach potential vendors. Subrecipients may also directly notify known potential vendors to encourage adequate competition.
e) Public Improvements. Rehabilitation, renovation, or other applicable improvements to real property owned by a unit of local government must comply with the Oklahoma Public Competitive Bidding Act of 1974, 61 O.S. §§ 101–153, as applicable.

4) Purchases must not be divided into smaller transactions for the purpose of avoiding an applicable procurement threshold.

Requirement No. 707
Other Federal Requirements
Effective October 1, 2026

Requirement

Subrecipients must comply with all applicable Federal requirements identified in the ESG contract and in this Requirement.

Subrecipients must also ensure that applicable Federal requirements are incorporated into agreements with subcontractors, as appropriate, including the following:

1) Subrecipients must comply with applicable Section 3 requirements under 12 U.S.C. §
2) 1701u and 24 CFR Part 75.
3) Davis-Bacon – The Davis-Bacon Act does not apply to the ESG Program pursuant to 24 CFR § 576.407(e).
4) Procurement of Recovered Materials – Subrecipients and contractors must comply with applicable recovered-material procurement requirements under 24 CFR § 576.407(f), Section 6002 of the Solid Waste Disposal Act, and 40 CFR Part 247.

Procedures

1) Lobbying and Disclosure Requirements
   a) Subrecipients must comply with the Federal lobbying restrictions in 31 U.S.C. § 1352 and 24 CFR Part 87.
   b) All ESG applicants are required to submit the ODOC Anti-Lobbying Certification as part of the ESG application. The certification provides that federally appropriated funds will not be used to influence or attempt to influence Federal officials in connection with the awarding, continuation, renewal, amendment, or modification of a federal award.
   c) If funds other than Federal appropriated funds have been or will be used for lobbying activities covered by these requirements, the applicant or subrecipients must complete and submit Standard Form LLL (SF-LLL), Disclosure of Lobbying Activities, as applicable.
   d) Subrecipients must also include the applicable lobbying certification and disclosure requirements in covered subawards, subcontracts, and other agreements, as required by Federal law.
2) Conflicts of Interest [24 CFR § 576.404(a), (c)]
   a) Subrecipients must maintain and follow written standards of conduct governing conflicts of interest in accordance with applicable Federal requirements.
   b) An employee, agent, consultant, officer or elected or appointed official who exercises responsibilities related to ESG-funded activities, participates in ESG decision-making, or has access to inside information regarding those activities must not obtain a personal or financial interest or benefit from an ESG-assisted activity.
   c) These individuals must not have a financial interest in an ESG-related contract, subcontract, agreement or the proceeds of such an agreement for themselves or for persons with whom they have family or business ties. This restriction applies during the individual's tenure and for one year afterward.
3) Drug-and Alcohol-Free Facilities and Drug-Free Workplace

a) Subrecipients must administer, in good faith, a policy designed to ensure that ESG-assisted homeless facilities are free from the illegal use, possession, or distribution of drugs or alcohol by program participants.
b) Subrecipients must also comply with applicable Federal Drug-Free Workplace requirements. All ESG applicants are required to submit the ODOC Drug-Free Workplace Certification as part of the ESG application.
c) Subrecipients must maintain and implement the drug-free workplace requirements certified in the application throughout the ESG grant period, including required employee notifications, drug-free workplace awareness activities, and applicable reporting and response requirements related to employee convictions.
d) Subrecipients must follow the notification and response requirements established in the ODOC Drug-Free Workplace Certification, including the applicable 5-calendar-day employee notification, 10-calendar-day notification to ODOC, and 30-calendar-day employer response requirements.

4) Uniform Administrative Requirements
a) Subrecipients must comply with 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, as applicable to the ESG award.

5) Nondiscrimination and Equal Opportunity Requirements
a) Subrecipients must comply with all applicable Federal fair housing, civil rights, nondiscrimination, and equal opportunity requirements, including the requirements referenced in 24 CFR § 5.105(a). Subrecipients must:
b) Ensure that ESG assistance, services and programming information are provided in accordance with applicable Federal nondiscrimination requirements;
c) Make information about the availability of ESG assistance and services accessible to eligible persons without discrimination; and
d) Take reasonable steps to provide meaningful access to ESG programs and services for persons with limited English proficiency (LEP).

6) Lead-Based Paint
a) Subrecipients must comply with applicable Federal lead-based paint requirements including the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35, as applicable to ESG assisted housing.
b) Lead Screening and Visual Assessment. For ESG-assisted housing constructed before 1978, subrecipients must determine whether Federal lead-based paint requirements apply. When required, a visual assessment must be completed before ESG assistance is required.
c) Identified Deteriorated Paint. When deteriorated paint is identified, required corrective actions must be completed before the unit is approved for ESG assistance. Depending on the extent of the deteriorated paint, Federal requirements may include lead-safe work practices, stabilization, clearance and notification to occupants.
d) Ongoing Compliance. Subrecipients must complete any required ongoing or periodic lead-based paint inspections and maintain documentation demonstrating continued compliance for as long as the applicable requirements remain in effect.
e) Required Information. When applicable, occupants must receive the EPA/HUD pamphlet Protect Your Family from Lead in Your Home and any notices required by 24 CFR Part 35.

7) Affirmatively Furthering Fair Housing
    a) Subrecipients must administer ESG-funded programs and activities in a manner that affirmatively furthers fair housing and complies with applicable Federal fair housing and civil rights requirements. Subrecipients must take appropriate actions to promote fair housing and equal access to ESG-assisted housing and services. Actions may include:
    b) Conducting outreach and making program information available to eligible persons, including persons with disabilities and persons with limited English proficiency;
    c) Providing accessible facilities, communications, and reasonable accommodation or modifications, as applicable;
    d) Providing information about fair housing rights and how to file a housing discrimination complaint, or referring program participants to appropriate fair housing sources;
    e) Recruiting landlords and housing providers in a manner that expands housing choices for ESG program participants.
8) Consolidated Plan and Consistency
    a) ESG funded activities must be consistent with the current HUD-approved Consolidated Plan applicable to the ESG program. All ESG applicants must submit the required HUD-2991, Certificate of Consistency with the Consolidated Plan, as part of the ESG application.
9) Confidentiality [24 CFR § 576.500(x)]
    a) Subrecipients must develop, implement and maintain written confidentiality procedures that ensure:
    b) Records containing personally identifying information (PII), as identified in Requirement 702 of this Manual, for any individual or family who applies for or receives ESG assistance are kept secure and confidential.
    c) The address or location of an ESG-assisted shelter serving victims of domestic violence, dating violence, sexual assault, or stalking is not made public, except with written authorization from the person responsible for operating the shelter.
    d) The address or location of a program participant's housing is not made public, except as permitted under a preexisting privacy policy of the recipient or subrecipient and consistent with applicable State and local privacy and confidentiality requirements.
    e) PII must not be included in documents submitted to ODOC unless specifically requested or required. When documentation is submitted to ODOC, unnecessary PII must be removed or redacted.
10) Discharge Policy
    a) Subrecipients must develop and implement, to the maximum extent practicable, appropriate policies and protocols to prevent persons being discharged from the subrecipients' shelter or housing program from immediately experiencing homelessness.
    b) Subrecipients must also coordinate, as appropriate, with the CoC, partner agencies, and publicly funded institutions or systems of care—such as health care facilities, foster care and other youth facilities, and correctional programs and institutions—to support efforts to prevent discharge into homelessness.
    c) A subrecipients discharge policy must be included in ESG Policies and Procedures.
11) HMIS
    a) Subrecipients must comply with applicable HUD HMIS requirements for participation, data collection, data quality, privacy, security and reporting.

b) Victim Service Providers must use a comparable database that meets applicable HUD requirements and must not enter or provide any client PII to HMIS.
c) See Requirement 703, Eligible Program Activities, for additional HMIS and comparable database requirements and eligible costs.

12) Shelter and Housing Standards [24 CFR § 576.403]
a) ESG-assisted emergency shelters and permanent housing must meet the applicable Federal, State, local and ODOC shelter and housing standards.
b) Lead-Based Paint. Subrecipients must comply with applicable Federal lead-based paint requirements. See Requirement 707.F., Lead-Based Paint, of this Manual.
c) Emergency Shelter Standards. ODOC does not allow ESG funds to be used for the conversion, major rehabilitation or renovations of emergency shelters.
d) Emergency shelters receiving ESG assistance for shelter operations must meet the applicable minimum safety, sanitation, and privacy standards established in 24 CFR § 576.403(b), including standards related to:
   - Structure and materials;
   - Accessibility;
   - Space and security;
   - Interior air quality;
   - Water supply;
   - Sanitary facilities (toilets and hygiene facilities);
   - Thermal environment;
   - Illumination and electricity;
   - Food preparation;
   - Overall sanitary conditions; and
   - Fire safety.
e) Subrecipients must document compliance using the ODOC-required Shelter Standards Checklist.
f) c) Permanent Housing Standards and NSPIRE. When ESG funds are used for permanent housing under 24 CFR §§ 576.105 or 576.106, the housing must meet the applicable physical condition standards established in 24 CFR § 576.403(c). These requirements incorporate HUD's National Standards for the Physical Inspection of Real Estate (NSPIRE) requirements applicable to ESG-assisted permanent housing.
g) Subrecipients must comply with applicable HUD NSPIRE requirements and with additional inspection procedures, documentation requirements, and guidance issued by ODOC.
h) Before ESG funds are used to assist a program participant to remain in or move into specific housing, the subrecipient must inspect the housing and document that the applicable standards are met, except as specifically permitted for certain Homelessness Prevention services during the first 30 days of assistance.
i) Housing assisted with ESG funds must be reinspected at least once every 12 months during the period of assistance to confirm continued compliance with the applicable standards.
j) If an inspection identifies a deficiency that prevents the housing from meeting the applicable standards, ESG funds must not be used for that housing unless the owner corrects the deficiency within 30 days of the initial inspection and the subrecipient verifies that all identified deficiencies have been corrected.

k) Housing for which ESG funds are used solely to pay rental arrears is subject to these housing standards only when the program participant is seeking to remain in that housing.
l) Subrecipients must use the ODOC-required inspection form or checklist and maintain completed inspection documentation in the program participant's file.

13) Equal Participation of Faith-Based Organizations [24 CFR §§ 5.109 and 576.406]
a) Faith-based organizations are eligible to participate in the ESG program on the same basis as other eligible organizations. An organization must not be favored or discriminated against because of its religious character, affiliation, or lack thereof.
b) ESG-Funded Activities. Faith-based organizations receiving direct ESG assistance must not use ESG funds to support or engage in explicitly religious activities, such as worship, religious instruction, or proselytization, except as otherwise permitted by Federal law. When an organization conducts explicitly religious activities, those activities must be separated from ESG-funded activities and participation must be voluntary.
c) Organizational Independence. A faith-based organization receiving ESG funds retains its independence and may continue to carry out its religious mission. The organization is not required to remove religious art, symbols, scriptures, or other religious materials from facilities in which ESG services are provided and may retain its religious identity and internal governance, consistent with applicable Federal requirements.
d) Nondiscrimination. ESG-funded services must not be denied to a program participant or prospective program participant based on religious belief, refusal to hold a religious belief, or refusal to participate in a religious practice.
e) Notice to Program Participants. The recipient or subrecipient responsible for determining ESG eligibility must provide program participants and prospective program participants with the written beneficiary notice required by 24 CFR § 5.109. The notice must generally be provided before enrollment or receipt of services. When an emergency or other exigent circumstance makes advance notice impracticable, the notice must be provided at the earliest available opportunity.
f) Commingled Funds. When State or local funds are commingled with direct Federal ESG funds, the requirements of 24 CFR § 5.109 apply to the commingled funds as provided by that regulation.
g) Documentation. Subrecipients must maintain documentation demonstrating compliance with the requirements applicable to faith-based activities.

14) Relocation and Displacement [24 CFR § 576.408]
a) Subrecipients must take all reasonable steps to minimize the displacement of persons, families, individuals, nonprofit organizations, and farms because of ESG activities.
b) If an ESG-funded activity may result in temporary or permanent displacement or relocation, the subrecipient must contact ODOC before taking action to determine the applicable Federal relocation, notification, and assistance requirements.

15) Termination of Assistance [24 CFR § 576.402]
a) Subrecipients must establish and follow a written procedure for terminating ESG assistance to a program participant. The procedure must be included in the subrecipient's ESG Policies and Procedures. When ESG assistance is terminated, the subrecipient must provide the program participant with:
- Written Notice. Written notice clearly stating the reason(s) for termination;

- Review of the Decision. An opportunity to present written or oral objections to a person other than the individual who made or approved the termination decision, or that individual's subordinate; and
- Final Decision. Prompt written notice of the final decision.

b) Documentation of the termination process, including the notices, and review, must be maintained in the program participant's file. Termination of ESG assistance does not prohibit a program participant from receiving ESG assistance later if the individual or family is otherwise eligible.

16) Participation of Homeless or Formerly Homeless Individuals [24 CFR § 576.405]
   a) To the maximum extent practicable, ESG subrecipients must involve individuals and families experiencing homelessness in carrying out ESG-assisted facilities and services, including through employment, volunteer services, consultation, or other meaningful participation, consistent with 24 CFR § 576.405(c).
   b) Alternative Requirement. If a subrecipient is unable to meet this requirement, the subrecipient must develop and implement a written plan to consult with individuals who are homeless or formerly homeless when considering and making policies and decisions regarding ESG-funded facilities, services, or assistance.
   c) The subrecipient's compliance with this requirement, including the consultation process when applicable, must be addressed in its ESG Policies and Procedures. See Requirement 708, Part II.A.14 for the required Policies and Procedures provisions.
17) Executive Order and Federal Grant Policy Requirements
   a) Subrecipients must comply with applicable Executive Order and Federal policy requirements incorporated into ODOC's HUD ESG Grant Agreement, as applicable to the ESG award. Requirements are subject to applicable Federal law, HUD guidance, grant terms and conditions, and any subsequent Federal directives or legal requirements communicated by ODOC.
18) Immigration and Public Benefit Eligibility Requirements.
   a) Subrecipients must administer ESG assistance in accordance with applicable Federal requirements governing eligibility for Federal public benefits, including the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), 8 U.S.C. §§ 1601–1646, as applicable.
   b) Eligibility Determination. Immigration status requirements do not apply in the same manner to every ESG-funded activity or every type of subrecipient. Subrecipients must determine whether the specific ESG assistance being provided is subject to Federal immigration-status eligibility requirements.
   c) Verification. When Federal law requires verification of immigration status for the assistance being provided, the subrecipient must follow applicable Federal verification requirements and ODOC procedures. SAVE must be used where required and applicable.
   d) Exceptions. Certain ESG-funded services may be exempt from immigration-status restrictions or verification requirements under Federal law. In addition, nonprofit charitable organizations are not required by PRWORA to verify an applicant's immigration status, although other Federal requirements may apply.
   e) Subrecipients should contact ODOC when there is a question regarding whether immigration-status eligibility or verification requirements apply to a particular ESG activity or program participant.

19) Build America, Buy America (BABA) [2 CFR Part 184]
    a) Subrecipients must comply with applicable Build America, Buy America Act (BABA) requirements when ESG funds are used for a covered infrastructure project.
    b) ODOC does not allow ESG funds to be used for conversion, major rehabilitation, or renovation of emergency shelters. Therefore, BABA requirements generally are not expected to apply to activities funded under the ODOC ESG program. If a subrecipient believes an ESG-funded activity may involve construction, alteration, maintenance, or repair of infrastructure that could be subject to BABA, the subrecipient must contact ODOC before incurring the cost to determine whether BABA requirements apply.
20) Fraud, Waste, Abuse and Whistleblower Protections
    a) Subrecipients must maintain appropriate procedures for identifying, reporting and responding to suspected fraud, waste, abuse, and other misconduct involving ESG funds.
    b) Mandatory Disclosures. In accordance with 2 CFR § 200.113, a subrecipient must promptly disclose in writing any credible evidence of a violation of Federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations, or a violation of the civil False Claims Act that could potentially affect the ESG award. Required disclosures must be made to ODOC, HUD, and the HUD Office of Inspector General (OIG), as applicable.
    c) Suspected fraud, waste, abuse, or mismanagement involving HUD programs may also be reported to the HUD OIG Hotline at 1-800-347-3735 or through the HUD OIG online reporting system.
    d) Whistleblower Protections [41 U.S.C. § 4712]. Subrecipients must protect employees from retaliation for making disclosures protected under Federal law. An employee must not be discharged, demoted, or otherwise discriminated against for making a protected disclosure concerning:
        - Gross mismanagement of a federal grant or contract;
        - Gross waste of Federal funds;
        - Abuse of authority relating to a federal grant or contract;
        - A substantial and specific danger to public health or safety; or
        - A violation of law, rule, or regulation related to a federal grant or contract.
    e) Employee Notification. Subrecipients must inform employees in writing, in the predominant language of the w41 U.S.C. § 4712.orkforce, of their whistleblower rights and remedies under
    f) Subawards and Contracts. Subrecipients must include applicable fraud, waste, abuse, mandatory disclosure and whistleblower requirements in subaward and contracts as required by Federal law and the terms and conditions of the ESG award.
21) Youth Eligibility Flexibility
    a) Youth age 24 and under seeking ESG assistance, including shelter, services or rental assistance, must not be required to provide third-party documentation of homeless status as a condition of receiving assistance.
    b) Youth Living in Unsafe Situations. Unaccompanied youth age 24 and under, and families headed by youth age 24 and under, who have an unsafe primary nighttime residence and no safe alternative to that residence may be considered homeless for purposes of assistance provided by a private nonprofit organization whose primary mission is service youth age 24 and under and families headed by youth age 24 and under.

c) Implementation. Subrecipients must ensure that staff responsible for eligibility determinations understand and follow these requirements. Eligible youth must not be denied ESG assistance solely because third-party documentation of homeless status is unavailable.
d) Subrecipients must document eligibility in accordance with applicable ESG recordkeeping requirements; however, third-party documentation must not be required when prohibited by this section.

Requirement No. 708
Written Standards and Procedures
Effective October 1, 2026

Requirement

ESG Written Standards and Policies and Procedures [24 CFR § 576.400]. Subrecipients must establish and maintain written standards for providing ESG assistance and must apply those standards consistently throughout the ESG program.

Procedure

The required written standards must be incorporated in the subrecipient's ESG Policies and Procedures.

1. Annual Review and Approval. Subrecipients must review their ESG Policies and Procedures at least annually and update them as necessary. The annual review must include review by appropriate program staff and approval by the subrecipient's Board of Directors, or equivalent governing body.
2. New Subrecipients. New subrecipients must develop, obtain board approval of, and submit complete ESG Policies and Procedures to ODOC within 90 days of the ESG award letter, unless otherwise directed by ODOC.
3. Sponsored Entities. A sponsored entity's Board of Directors must review and approve its ESG Policies and Procedures annually. Following approval by the sponsored entity's Board, the Sponsor's Board of Directors must also review and approve the sponsored entity's ESG Policies and Procedures.
4. Documentation of Board approval. Subrecipients must maintain and submit documentation demonstrating the required Board review and approval. Documentation must include:
   - The Board meeting agency identifying the ESG Policies and Procedures as an agenda item;
   - Signed Board meeting minutes documenting the Board's review and approval; and
   - The subrecipient's ESG Policies and Procedures.
5. ODOC Review. ODOC will verify compliance with these requirements during monitoring.

Required ESG Written Standards and Procedures

The subrecipient's ESG Policies and Procedures must include written standards and procedures addressing the requirements identified below. These standards and procedures must be applied consistently to all applicable ESG program participants in accordance with 24 CFR Part 576, Subpart E**.**

1. Eligibility Evaluation and Re-Evaluation. The subrecipient's ESG Policies and Procedures must describe:
   a) Initial Eligibility Evaluation. The process used to conduct and document the initial evaluation of each individual or family's eligibility for ESG assistance.
   b) Coordinated Entry. The process for coordinating eligibility evaluation and participant access with the applicable Continuum of Care's Coordinated Entry system, as required. Victim Service Providers must follow applicable requirements for Victim

Service Providers and are not required to use a Coordinated Entry process that would require disclosure of prohibited client-level information.

c) Documentation of Homeless Status. The process used to obtain and document evidence of homeless status in accordance with applicable ESG recordkeeping requirements, including the applicable order of priority for documentation.

2. Lack of third-party documentation must not prevent an individual or family from immediately accessing emergency shelter or Street Outreach services or from receiving immediate shelter or services from a victim service provider when otherwise eligible.
    a) Case Management. The process for providing required case management to program participants receiving Homelessness Prevention or Rapid Re-Housing assistance, including applicable frequency requirements and exceptions permitted by Federal law.
    b) Housing Stability Planning. The process used to assist Homelessness Prevention and Rapid Re-Housing program participants in developing a plan for maintaining permanent housing after ESG assistance ends, taking into consideration income, expenses, available public or private assistance, and housing affordability.
    c) Eligibility Re-evaluation. The process used to re-evaluate continued eligibility and the type and amount of assistance needed:
        - At least once every three months for HP; and
        - At least once annually for RRH.
    d) Changes in Income or Circumstance. The process by which program participants' receiving Homelessness Prevention or Rapid Re-Housing assistance report changes in income or other circumstances that may affect their need for assistance and the process used by the subrecipient to re-evaluate assistance when changes occur. When income must be determined for ESG eligibility or re-evaluation, the subrecipient must calculate annual income in accordance with 24 CFR § 5.609 and applicable HUD and ODOC requirements.
3. Coordination of Services and Assistance. The subrecipient's ESG Policies and Procedures must describe how the subrecipient coordinates ESG-funded activities, to the maximum extent practicable, with other homeless assistance and mainstream service and housing resources available within the applicable Continuum of Care or service area. Coordination should include, as applicable:
    - Emergency shelter and other homeless assistance providers;
    - Street Outreach, Homelessness Prevention and Rapid Re-Housing providers;
    - Health, behavioral health and substance abuse treatment services
    - Services for children and youth;
    - Domestic violence and Victim Service Providers;
    - Veteran's housing and supportive service programs;
    - Public housing and other Federal, State, and local housing assistance;
    - Employment, education, income, and mainstream benefit programs; and
    - Other community resources that can assist program participants in obtaining or maintaining housing stability.
    - The written procedures must describe how the subrecipient coordinates referrals, services, and assistance with applicable community partners and the Continuum of Care.

4. Coordination with Mainstream Resources. The subrecipient's ESG Policies and Procedures must describe how ESG-funded activities are coordinated and integrated, to the maximum extent practicable, with mainstream housing, health, social service, employment, education, income, benefit, and youth programs for which ESG program participants may be eligible. Written procedures must describe how program participants are connected or referred to applicable mainstream resources and how the subrecipient coordinates with those programs, as appropriate.
5. Equal Access and Nondiscrimination. The subrecipient's ESG Policies and Procedures must describe how equal access to ESG-funded programs, facilities, benefits, accommodations, and services is provided in accordance with applicable Federal nondiscrimination and equal access requirements. The written procedures must address:
    a) Equal Access. How the subrecipient ensures that eligible individuals and families are provided equal access to ESG-funded programs, shelters, housing facilities, benefits, accommodations, and services in accordance with applicable Federal requirements.
    b) Admissions and Program Operations. How admissions, eligibility, occupancy, privacy, health, safety, security and other program operating practices are administered in a nondiscriminatory manner.
    c) Family Composition. How eligibility and services are provided without imposing prohibited restrictions based on family composition or marital status. For the definition of Family, see Requirement 702, Part I.A.18.
    d) Compliance and Documentation. How the subrecipient documents compliance with applicable Federal nondiscrimination, equal opportunity, equal access and affirmative outreach requirements.
    e) See Requirement 707, Other Federal Requirements, for additional nondiscrimination, equal opportunity, and affirmatively further fair housing requirements.
6. Street Outreach. The subrecipient's ESG Policies and Procedures must describe how Street Outreach essential services are targeted and provided to unsheltered individuals and families experiencing homelessness in accordance with 24 CFR § 576.101. If the subrecipient does not provide ESG-funded Street Outreach, the ESG Policies and Procedures must clearly state that Street Outreach is not provided under the subrecipient's ESG program.
7. Emergency Shelter Admission, Diversion, Referral and Discharge. The subrecipient's ESG Policies and Procedures must describe the processes used for admission, diversion, referral and discharge from ESG-assisted emergency shelter. The written procedures must be addressed at a minimum:
    a) Length of Stay. Any limitation on the length of time a program participant may remain in the emergency shelter, if applicable.
    b) Safety Shelter Needs. Safeguards used to address the safety and shelter needs of program participants, including:
        - Survivors of domestic violence, dating violence, sexual assault, and stalking; and
        - Individuals or families with significant barriers to housing, including those likely to experience longer periods of homelessness.
    c) See Requirement 707.J, Discharge Policy, for additional requirements related to discharge from ESG-assisted programs.

8. Emergency Shelter Essential Services. The subrecipient's ESG policies and Procedures must describe the process used to assess, prioritize, and reassess the essential service needs of individuals and families receiving emergency shelter assistance.
9. Homelessness Prevention and Rapid Re-Housing Prioritization. The subrecipient's ESG Policies and Procedures must describe the process used to determine and prioritize which eligible individuals and families receive Homelessness Prevention assistance and which receive Rapid Re-Housing assistance.
10. Program Participant Share of Rent and Utilities. The subrecipient's ESG Policies and Procedures must describe how the subrecipient determines the amount, if any, that a program participant receiving Homelessness Prevention or Rapid Re-Housing assistance is required to contribute toward rent and utility costs.
11. Duration and Amount of Rental Assistance. The subrecipient's ESG Policies and Procedures must describe how the subrecipient determines the duration and amount of rental assistance provided to a program participant, including whether and how the amount of assistance may be adjusted over time.
12. Housing Relocation and Stabilization Services. The subrecipient's ESG Policies and Procedures must describe how the subrecipient determines the type, amount, and duration of Housing Relocation and Stabilization Services provided to program participants receiving Homelessness Prevention or Rapid Re-Housing assistance. The written procedures must identify any limits established by the subrecipient on the assistance a program participant may receive including, as applicable:
    - Maximum amount of assistance;
    - Maximum duration of assistance; and
    - Maximum number of times a program participant may receive assistance.
13. Violence Against Women Act (VAWA) Protections. The subrecipient's ESG Policies and Procedures must describe how the subrecipient complies with applicable Violence Against Women Act (VAWA) requirements under 24 CFR Part 5, Subpart L and 24 CFR § 576.409. The written procedures must address, as applicable:
    a) Protection from Denial or Termination of Assistance. ESG assistance, shelter or housing must not be denied or terminated solely because an applicant or program participant is or has been a survivor of domestic violence, dating violence, sexual assault or stalking.
    b) Required VAWA Notices and Documentation. Subrecipients administering ESG rental assistance must establish procedures for providing required VAWA notices and forms, including HUD-5380, Notice of Occupancy Rights Under the Violence Against Women Act, and HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and Alternate Documentation, at the times required by HUD.
    c) Emergency Transfers. Subrecipients administering ESG rental assistance must develop and implement a VAWA-compliant Emergency Transfer Plan and establish procedures for receiving, evaluating, documenting, and responding to emergency transfer requests. HUD-5381 may be used as the model Emergency Transfer Plan.
    d) Family Separation and Continued Assistance. Procedures must address continuation of applicable ESG rental and utility assistance when a household is separated as a result of VAWA protections.

e) Emergency Shelters. An otherwise eligible individual or family must not be denied admission to or removed from an ESG-funded emergency shelter because the individual or family is or has been a survivor of domestic violence, dating violence, sexual assault, or stalking.
f) Confidentiality. Information related to an individual's VAWA status, documentation, or request for VAWA protections must be maintained confidentially and disclosed only as permitted by applicable Federal requirements.
g) Retaliation and Right to Seek Assistance. Written procedures must protect applicable VAWA rights, including protections against retaliation, coercion, intimidation, or interference and the right to seek law enforcement or emergency assistance without prohibited penalties.
h) Subrecipients must maintain documentation demonstrating compliance with applicable VAWA requirements.

14. Conflict of Interest [24 CFR § 576.404]. Subrecipient's ESG Policies and Procedures must include written conflict-of-interest standards and procedures that address organizational, individual and procurement conflicts of interest applicable to ESG-funded activities.
    a) Organizational Conflicts of Interest. ESG assistance must not be conditioned on an individual or family's acceptance or occupancy of emergency shelter or housing owned by the subrecipient or by a parent or subsidiary of the subrecipient. A subrecipient must not conduct the initial ESG eligibility evaluation or administer Homelessness Prevention assistance for an individual or family occupying housing owned by the subrecipient or by a parent or subsidiary of the subrecipient.
    b) Individual Conflicts of Interest. The written procedures must prohibit employees, agents, consultants, officers, and elected or appointed officials who exercise ESG responsibilities, participate in ESG decision-making, or have access to inside information concerning ESG-funded activities from obtaining prohibited financial interest or benefit from an ESG-assisted activity. This restriction applies during the individual's tenure and for one year afterward, as provided in 24 CFR § 576.404.
    c) Procurement Conflicts of Interest. Conflicts of interest involving the procurement of goods and services must be addressed in accordance with 2 CFR § 200.318 and Requirement 706, Procurement Requirements.
    d) Contractors. Contractors must comply with applicable conflict-of-interest requirements under 24 CFR § 576.404.
    e) Requests for Exceptions. A subrecipient must not independently approve an exception to the ESG conflict-of-interest requirements. If a subrecipient believes an exception may be warranted under 24 CFR § 576.404, the subrecipient must contact ODOC and obtain instructions before proceeding with the affected transaction or activity.
    f) The subrecipient must provide ODOC with documentation requested to evaluate and submit the exception request, including the nature of the conflict and any required public disclosure or other supporting documentation. Only HUD may grant an exception when permitted under 24 CFR § 576.404.
    g) Confidentiality. When a conflict-of-interest matter involves information protected by VAWA or other applicable confidentiality requirements, the subrecipient must

protect that information throughout the disclosure and exception process. See Requirement 707.I, Confidentiality, and Requirement 708.A.12, VAWA Protections.

15. Termination of Assistance [24 CFR § 576.402]. The subrecipient's ESG Policies and Procedures must describe the process for terminating ESG assistance when a program participant violates program requirements. Termination must be based on a formal process that recognizes the rights of the program participant. The subrecipient must consider the circumstances of each case and terminate assistance only in the most severe cases. At a minimum, the termination process must include:
    a) Written Notice. Written notice to the program participant clearly stating the reason(s) for termination;
    b) Review of the Decision. An opportunity for the program participant to present written or oral objections before a person other than the person who made or approved the termination decision, or a subordinate of that person; and
    c) Final Decision. Prompt written notice to the program participant of the final decision.
16. Applicant Appeals Procedure. The subrecipient's ESG Policies and Procedures must include a written process that allows an applicant to appeal a decision regarding eligibility for ESG assistance. At a minimum, the appeals procedure must provide that:
    a) Notice of Appeal Rights. Application forms used to determine eligibility for ESG assistance must include notice of the applicant's right to appeal and information on how to make a request and appeal.
    b) Timely Appeal Process. Upon an applicant's request for an appeal, the subrecipient must initiate the appeals process within ten (10) days.
    c) Applicant Rights. The appeals procedure must provide the applicant with:
        - The right to submit a formal application for ESG assistance;
        - Privacy and confidentiality throughout the application and appeals process;
        - Timely notice of the approval or denial of the application;
        - Written information explaining the appeals process;
        - A reasonable opportunity for a fair hearing or review of the decision;
        - Access by the applicant, or the applicant's authorized representative, to records relevant to the appeal, subject to applicable confidentiality and privacy requirements; and
        - Timely determination of the appeal and prompt written notice of the final decision.
    d) Appeal to ODOC. After the subrecipient's local appeals procedures have been exhausted, the applicant may appeal the subrecipient's decision to ODOC. The subrecipient and the applicant must provide ODOC with the documentation necessary to review the appeal.
17. Participation of Individuals Experiencing or Formerly Experiencing Homelessness [24 CFR § 576.405]. The subrecipient's ESG Policies and Procedures must describe how individuals experiencing or formerly experiencing homelessness participate in considering and making policies and decisions regarding ESG-funded facilities, services or other assistance.
    a) Participation in Policymaking. To the maximum extent practicable, the subrecipient must provide for the participation of at least one individual experiencing or formerly experiencing homelessness on its Board of Directors, or other equivalent

policymaking entity when that entity considers and makes policies or decisions regarding ESG-funded facilities, services, or other assistance.

b) Alternative Consultation Process. If the subrecipient is unable to meet the participation requirement above, it must develop and implement a plan to consult with individuals experiencing or formerly experiencing homelessness when considering and making policies and decisions regarding ESG-funded facilities, services or other assistance. The subrecipient's written procedures must describe:
   - How feedback is obtained from individuals experiencing or formerly experiencing homelessness;
   - How that feedback is provided to the Board of Directors or other applicable policymaking entity; and
   - How the organization considers and incorporates that feedback, as appropriate, into its ESG policies, procedures, services and program operations.

18. Duplication of Benefits (DoB). The subrecipient's ESG Policies and Procedures must include procedures to prevent duplication of benefits. ESG assistance must not be provided for the same cost, for the same purpose and period, when that cost has already been paid or will be paid by another source. At a minimum, the procedures must describe how the subrecipient:
    a) Determines whether other financial assistance is available or has been provided for the same cost, purpose and period;
    b) Documents the review for potential duplication of benefits in the program participant's file;
    c) Coordinates ESG assistance with other available resources, as applicable; and
    d) Prevents ESG assistance, when combined with assistance from other resources, from exceeding the program participant's eligible need.
19. Provision of Supportive Services. The subrecipient's ESG Policies and Procedures must describe how supportive services are offered and provided to program participants, as appropriate to their individual needs. Program participants must not be required to participate in treatment or other supportive services as a condition of receiving ESG-funded shelter, housing, or other assistance, except when participation is specifically required by applicable ESG regulations.
20. Supportive services are offered according to need; participation is not a condition of ESG assistance unless ESG, or another applicable federal requirement specifically makes it one.
21. Housing Stability Case Management. Program participants receiving HP or RRH assistance must meet with a case manager at least once per month and participate in the development of a housing stability plan, as required by 24 CFR § 576.401(e), subject to the exceptions provided under that section.
22. PRWORA and Federal Eligibility Requirements. The subrecipient's ESG Policies and Procedures must describe how the subrecipient complies with applicable Federal requirements concerning eligibility for ESG-funded assistance, including the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), when applicable. At a minimum, the procedures must address:
    a) Applicability. How the subrecipient determines whether PRWORA eligibility and verification requirements apply to the specific ESG-funded assistance being provided;

b) Verification. When verification is required, how the subrecipient verifies eligibility in accordance with applicable Federal requirements and current HUD, USCIS, and ODOC guidance;
c) SAVE. Use of the Systematic Alien Verification for Entitlements (SAVE) program when SAVE verification is required and applicable to the ESG-funded assistance being provided; and
d) Documentation. How the subrecipient documents compliance with the applicable eligibility and verification requirements.
e) Subrecipients must not impose citizenship or immigration-status verification requirements when verification is not required or authorized for the ESG-funded assistance being provided.

23. Reporting Fraud, Waste and Abuse; Whistleblower Protections. The subrecipient's ESG Policies and Procedures must include procedures for reporting suspected fraud, waste, abuse, and other wrongdoing involving ESG funds and for protecting employees who make protected disclosures.
    a) Reporting Fraud, Waste and Abuse. The procedures must describe how employees, contractors and other persons may report suspected fraud, waste, abuse, mismanagement, or other wrongdoing involving ESG or other HUD-funded activities to appropriate officials, including ODOC and the HUD Office of Inspector General (OIG). Reports to HUD OIG may be made through the HUD OIG Hotline at 1-800-347-3735 or through the HUD OIG online reporting system.
    b) Mandatory Disclosures. In accordance with 2 CFR § 200.113, the subrecipient must promptly disclose in writing credible evidence of violations requiring disclosure under that section to HUD, HUD OIG and ODOC as the pass-through entity, as applicable.
    c) Whistleblower Protections [41 U.S.C. § 4712]. The subrecipient must:
        - Notify employees in writing of applicable Federal whistleblower rights and remedies in the predominant native language of the workforce;
        - Protect employees from reprisal for making disclosures protected under Federal law;
        - Maintain procedures for receiving and addressing allegations of prohibited retaliation; and
        - Contractors and Other Agreements. The subrecipients must ensure that applicable fraud-reporting, mandatory disclosure, and whistleblower requirements are included in contracts, subawards, and other agreements when required by Federal law, or the terms and conditions of the ESG award.

Requirement No. 709
Treatment of Assets
Effective October 1, 2026

Requirement

ODOC requires individuals and families applying for ESG Homelessness Prevention assistance to disclose household assets as part of the eligibility determination process. Countable household assets must not exceed $5000 at the time eligibility is determined.

Asset disclosures must be checked at re-evaluations for both HP and RRH, as applicable.

Procedure

1. Asset Determination. ODOC requires household asset eligibility determination must be made:
    - At initial eligibility check for households apply for HP assistance; and
    - At re-evaluation for program participants receiving HP and RRH assistance
2. Asset Limit. Countable household assets must not exceed $5000 at the time of the applicable eligibility determination or re-evaluation.
3. Countable and Excluded Assets. For purposes of the ODOC ESG asset requirement, subrecipients must determine the value of countable household assets available to the household. Examples of countable assets may include:
    - Cash held in checking or savings accounts;
    - Stocks, bonds, certificates of deposit, and other investments;
    - Real property with cash value;
    - Trust funds that are accessible to the household; and
    - Lump-sum cash receipts or other assets available to the household.
4. Excluded assets include:
    - Retirement accounts and pensions, including applicable retirement savings accounts; and
    - One primary vehicle that is reasonable and appropriate for the household's transportation needs.
5. Valuation of Assets:
    - For purposes of the ODOC ESG asset limit, countable assets must be valued at their current cash value at the time of the applicable eligibility determination or re-evaluation.
    - Current cash value is the amount the household could reasonably receive from the asset if it were converted to cash, less reasonable costs or amounts necessary to convert the asset to cash.
    - For cash accounts, such as checking and savings accounts, the value is the amount available to the household at the time of the asset determination.
    - Subrecipients must use reasonable and consistent methods to determine and document the value of countable assets.

Requirement No. 710
Reporting Requirements
Effective October 1, 2026

Requirement

ESG subrecipients must collect and report program and participant data in accordance with applicable HUD HMIS Data Standards, ESG reporting requirements, and ODOC requirements.

Procedure

1) HMIS and Comparable Databases
   a) ESG subrecipients must ensure that data on persons served and ESG-assisted activities are entered into the applicable community-wide HMIS, as required by 24 CFR § 576.400(f).
   b) VSPs and legal services providers must use a comparable database that collects client-level data over time and generates unduplicated aggregate reports. Client-level information entered in a comparable database must not be entered into or provided directly to HMIS.
   c) Subrecipients must maintain documentation of participation in HMIS or an applicable comparable database in accordance with 24 CFR § 576.500(n).
   d) Sage. SAGE is HUD's reporting system for ESG Consolidated Annual Performance and Evaluation Report (CAPER) data. Subrecipients must generate the required ESG CAPER CSV files from HMIS or an applicable comparable database and upload the files to SAGE when requested by ODOC. VSPs are not exempt from ESG aggregate reporting requirements. Their comparable databases must be capable of generating the required ESG CAPER reporting data without disclosing protected client-level information to HMIS.
   e) Non-VSP. ODOC's contracted HMIS provider generates the required ESG CAPER CSV files for subrecipients participating in HMIS and uploads the files to SAGE for the applicable reporting periods. Subrecipients must provide ODOC with the requested CAPER reports for each ESG-funded project so that ODOC can coordinate the SAGE reporting process with the HMIS provider.
   f) VSP. VSPs must generate the required ESG CAPER CSV files from their comparable databases and upload the files directly to SAGE when instructed by ODOC. VSPs must ensure that their comparable databases are capable of generating the required ESG CAPER reporting files.
   g) Reporting Periods and Instructions. Subrecipients must follow the reporting periods, deadlines, and submission instructions provided by ODOC for each SAGE reporting cycle
2) Monthly Program Reporting. For each ESG-funded project, subrecipients must generate the applicable ESG CAPER report from HMIS or a comparable database for the reporting month. The CAPER report must be saved in PDF format and uploaded in OGX with the monthly ESG Reimbursement Claim Form. Monthly reports are due by the 20th day of the following month.
3) Semiannual Reporting. Subrecipients must provide ODOC with an ESG CAPER report for each ESG-funded project for the reporting period requested by ODOC. CAPER reports must be generated from HMIS, or for VSPs, from the applicable comparable database.

Requirement No. 711
Recordkeeping Documentation
Effective October 1, 2026

Requirement

Subrecipients must establish, maintain, and implement written policies and procedures sufficient to ensure that ESG funds are used in accordance with applicable Federal, State, and ODOC requirements. Required ESG written standards and procedures are addressed in Requirement 708 of this manual.

Procedures

1) Standardized ESG Client File Documents
   a) ESG subrecipients must verify and document applicant eligibility before providing ESG assistance and must maintain sufficient documentation in each program participant's file to demonstrate compliance with applicable ESG requirements.
   b) Subrecipients must use the standardized ESG client file forms required by ODOC and available on the ODOC ESG website. Subrecipients must also maintain written policies and procedures describing how required eligibility, assistance, services, and other program documentation is obtained, completed, maintained and protected.
   c) Client files must contain sufficient documentation to demonstrate compliance with applicable ESG eligibility and program requirements, including 24 CFR §§ 576.400, 576.401, and 576.500.
2) Language Access
   a) ESG subrecipients must provide meaningful access to ESG programs, services, and information for persons with limited English proficiency (LEP) in accordance with applicable Federal requirements and the current ODOC Language Access Plan (LAP).
   b) Subrecipients must take reasonable steps to identify and address language-access needs and must provide appropriate language assistance when necessary to ensure meaningful access to ESG-funded programs and services.
   c) Vital Documents. Subrecipients must make translated ESG vital documents available in the languages required by the current ODOC LAP. Vital documents include documents that are necessary for an applicant or program participant to apply for, qualify for, receive or maintain ESG assistance or services.
   d) ODOC-provided translations of standardized ESG vital documents are available on the ODOC ESG website. Subrecipients must use the applicable translated documents when required and must provide additional language assistance when necessary to ensure meaningful access.
3) Homeless Status.
   a) Subrecipients must maintain and follow written intake procedures for determining and documenting homeless status in accordance with the applicable category of the homeless definition in 24 CFR § 576.2 and the recordkeeping requirements of 24 CFR § 576.500(b).
   b) Documentation must be obtained and maintained in the program participant's file and must support the specific category of homelessness under which the individual or family qualifies.

c) Lack of third-party documentation must not prevent an individual or family from immediately receiving Street Outreach services, being admitted to Emergency shelter, or receiving applicable shelter or services from a VSP.
d) Category 1 – Literally Homeless. The participant file must contain documentation supporting eligibility under Category 1, which may include outreach-worker observation, referral or documentation from another housing or service provider, institutional discharge documentation when applicable, or participant certification when permitted under 24 CFR § 576.500(b).
e) Category 2 – Imminent Risk of Homelessness. The participant file must document that the individual or family will lose their primary nighttime residence within the period established by the Federal homeless definition, has no subsequent residence identified, and lacks the resources or support networks necessary to obtain other permanent housing. Documentation must meet the applicable requirements of 24 CFR § 576.500(b).
f) Category 3 – Homeless Under Other Federal Statutes. When assistance under Category 3 is permitted, the participant file must contain documentation sufficient to establish eligibility under the applicable Federal requirements.
g) Category 4 – Fleeing or Attempting to Flee Domestic Violence or Other Dangerous or Life-Threatening Conditions. The participant file must document eligibility in accordance with 24 CFR § 576.500(b), using only the minimum information necessary and protecting the safety and confidentiality of the individual or family.
h) Youth Documentation Flexibility. When applicable HUD grant conditions or other Federal requirements provide additional documentation flexibility for youth aged 24 and under, subrecipients must apply those requirements and must not deny otherwise eligible youth assistance solely because prohibited third-party documentation is unavailable.
i) Order of Documentation. Except when otherwise permitted by applicable Federal requirements, subrecipients must obtain evidence in the following order of priority:
    - Third-party documentation;
    - Intake worker observation; and
    - Certification by the individual or head of household seeking assistance.

4) At Risk of Homelessness Status.
a) For each individual or family receiving ESG HP assistance based on "at risk of homelessness" status, the subrecipient must maintain documentation establishing eligibility in accordance with the definition at 24 CFR § 576.2 and the recordkeeping requirements at 24 CFR § 576.500(c). The program participant's file must include the required intake and eligibility documentation and sufficient evidence to establish each applicable element of the "at risk of homelessness" definition.
b) At Risk of Homelessness – Category 1. When eligibility is established under paragraph (1) of the "at risk of homelessness" definition, the file must contain:
    - Annual household income in accordance with applicable ESG requirements;
    - That the individual or family has insufficient financial resources and support networks immediately available to attain housing stability; and
    - At least one of the conditions required under paragraph (1)(iii) of the "at risk of homelessness" definition.
c) Subrecipients must obtain the most reliable evidence available to document eligibility. Documentation may include source documents, third-party written or oral verification

documented by intake staff, or when other documentation cannot be obtained, documentation by intake staff of the efforts made to obtain the required evidence, as permitted by 24 CFR § 576.500(c).

d) At Risk of Homelessness – Categories 2 and 3. When eligibility is established under paragraph (2) or (3) of the "at risk of homelessness" definition, the file must contain the required certification of the child's or youth's homeless status from the applicable agency or organization identified in 24 CFR § 576.500(c).

5) Determinations of Ineligibility
   a) For each individual or family determined ineligible for ESG assistance, the subrecipient must maintain documentation in the applicant file that clearly identifies the reason for the determination of ineligibility.
6) Annual Income
   a) For each program participant receiving HP assistance and each program participant receiving RRH assistance who is required to have an annual income evaluation, the subrecipient must maintain documentation supporting the household's annual income determination. The program participant's file must include:
      - The required income evaluation form, completed by the subrecipient; and
      - Documentation supporting income determination, using the following order of priority:
        - Source Documentation, such as wage statements, public benefit statements, unemployment compensation statements, bank statements or other applicable records.
        - Third-party verification, when source documentation cannot be obtained, including written verification or intake staff documentation of oral verification from the appropriate third-party; or
        - Program participant certification, when source documentation and third-party verification cannot be obtained, documenting the income received for the most recent representative period and reasonably expected income for the following three-month period.
   b) The subrecipient must document efforts to obtain the applicable income information and maintain the supporting documentation in the program participant's file.
7) Program Participant Records [24 CFR § 576.500(f)].
   a) In addition to documentation establishing homelessness status, as applicable, the subrecipient must maintain a program participant file that documents the ESG services and assistance provided and demonstrates compliance with applicable ESG requirements. At a minimum, the file must document:
      i) Services and Assistance Provided. The type and amount of ESG-funded services and assistance provided to the program participants, including, as applicable, rental assistance, securing deposits, utility assistance and other financial assistance;
      ii) Program Compliance. Compliance with the requirements applicable to the ESG component and assistance provided, including eligibility, determination of the amount and type of assistance and applicable case management and housing stability requirements; and

b) Termination of Assistance. When applicable, documentation demonstrating compliance with the termination procedures required by 24 CFR § 576.402 and Requirement 708 – Written Standards and Procedures.

8) Housing and Rental Assistance Records 24 CFR § 576.500(h)–(j)]
   a) Subrecipients must maintain, as applicable:
      - Copies of leases and required Rental Assistance Agreements;
      - Documentation supporting rental assistance payments, including applicable dates of occupancy;
      - Documentation of utility allowances used in determining compliance with applicable rent requirements; and
      - Documentation demonstrating compliance with applicable shelter and housing standards, including required inspection records.
9) Emergency Shelter and ESG Services Records [24 CFR § 576.500(k)–(l)]
   a) Subrecipients must maintain records documenting the ESG-funded emergency shelters, services, and assistance provided and the amount of ESG funds expended for each applicable activity. UGLGs must also maintain documentation necessary to demonstrate compliance with any applicable maintenance-of-effort requirements.
10) Program Coordination and HMIS Records [24 CFR § 576.500(m)–(n)]
   a) Subrecipients must maintain documentation demonstrating:
      - Required participation and coordination with the applicable Continuum of Care and coordination with other homeless assistance and mainstream resources; and
      - Participation in HMIS or when applicable use of a comparable database.
11) ESG Match and Financial Records [§576.500(o) and (u)]
   a) Subrecipients must maintain sufficient financial records to document:
      - The source and use of ESG matching contributions, including the applicable grant year and the basis used to value noncash contributions;
      - All costs charged to ESG and supporting documentation demonstration that expenditures were allowable;
      - Receipt and use of program income, when applicable; and
      - Compliance with applicable ESG expenditure limits and ODOC spending requirements.
      - See Requirement 705 – Financial Management Standards of this Manual.
12) Compliance Records [§576.500(p)–(t)]
   a) Subrecipients must maintain sufficient documentation to demonstrate compliance with applicable ESG and Federal requirements, including, as applicable:
      - Conflict-of-interest requirements and approved exceptions;
      - Participation of individuals experiencing or formerly experiencing homelessness;
      - Faith-based organization requirements;
      - Nondiscrimination, equal opportunity, and affirmative outreach requirements
      - Uniform administrative requirements;
      - Environmental review requirements;
      - Lobbying and disclosure requirements;
      - VAWA requirements, including applicable emergency transfer records; and
      - Displacement, relocation and acquisition requirements.
      - See Requirements 707 – Other Federal Requirements and, 708, Written Standards and Procedures of this Manual.

13) Contracts and Procurement Records [§576.500(v)]
    a) Subrecipients must retain copies of procurement contracts and sufficient documentation to demonstrate compliance with applicable procurement requirements. See Requirement 706 – Procurement Requirements of this Manual.
14) Confidentiality and Record Security [§576.500(x)]
    a) Subrecipients must maintain written procedures to protect the security and confidentiality of records containing Personally Identifiable Information (PII). Records must be stored and shared in a manner that prevents unauthorized access or disclosure. The location of shelters serving survivors of domestic violence, dating violence, sexual assault, or stalking and the addresses of program participant housing must be protected in accordance with §576.500(x) and applicable privacy and confidentiality requirements. See Requirement 707, Other Federal Requirements, Confidentiality.
15) Record Retention and Access [§576.500(y)–(z)]
    a) ESG records must be retained for at least five years after expenditure of all funds from the grant to which the records relate, or longer when required by applicable Federal, State, ODOC, litigation, audit, or other record-retention requirements.
    b) Subrecipients must provide HUD, ODOC, authorized auditors, and other authorized governmental representatives with access to ESG records as required by applicable law and Federal award requirements. Access to records must be provided in a manner consistent with applicable privacy and confidentiality requirements.

Requirement No. 712
Environmental Review
Effective October 1, 2026

Requirement

ESG activities are subject to environmental review by HUD under 24 CFR Part 50 and 24 CFR § 576.407(d). Subrecipients must provide ODOC with all information necessary for the applicable HUD environmental review and must not take prohibited property-related action or commit or expend HUD or local funds for an affected activity until HUD has completed the required environmental review and the applicable approval has been received.

Procedure

1) Environmental Review Documentation
   a) Subrecipients must complete and submit the environmental review documentation required by ODOC for the proposed ESG activities. Based on the activities funded through the State ESG Program, projects will generally qualify as Exempt. ODOC will review the submitted environmental review documentation and determine whether additional environmental review requirements apply.
2) Prohibition on Choice-Limiting Actions
   a) Subrecipients must not commit or expend ESG funds or take other prohibited choice-limiting actions before completion of the applicable environmental review process and receipt of ODOC authorization to proceed, when required. Costs incurred or commitments made in violation of environmental review requirements may be determined ineligible for ESG reimbursement.
3) Activities Requiring Additional Environmental Review
   a) ODOC does not fund rehabilitation, renovation, conversion, or project-based rental assistance under the State ESG Program. If a proposed activity or circumstance may require environmental review beyond the Exempt or CENST level, the subrecipient must contact ODOC before committing funds or taking action related to the activity.
4) ODOC Authorization
5) ODOC will notify the subrecipient when the applicable environmental review requirements have been completed and ESG funds may be used for the approved activities. Subrecipients must retain applicable environmental review documentation and ODOC authorization in their ESG records.

Requirement No. 713
Training and Technical Assistance
Effective October 1, 2026

Requirement

ODOC provides training and technical assistance to support subrecipient compliance with ESG requirements and effective administration of the ESG program.

Subrecipients must ensure that appropriate staff participate in training or technical assistance when attendance is required by ODOC.

Procedure

1) Training
   a) ODOC may provide training on ESG program requirements, program administration, financial management, reporting, monitoring, other topics necessary for effective implementation of the ESG program. Training may be provided in person, virtually, through written guidance, or by other appropriate methods.
2) Technical Assistance
   a) ODOC may provide technical assistance to address specific compliance, programmatic, financial, reporting, or administrative questions or concerns. Technical assistance may be initiated at the request of a subrecipient, or by ODOC when a need is identified.
3) Requests for Assistance
   a) Subrecipients are encouraged to contact their ODOC liaison when training, technical assistance, clarification, or additional guidance is needed. Requests should include sufficient information for ODOC to understand the question or issue and identify the appropriate assistance.
4) Required Training or Technical Assistance
   a) ODOC may require a subrecipient or appropriate staff to participate in training or technical assistance when necessary to address identified compliance concerns, monitoring results, program performance, or other ESG requirements.

Requirement No. 714
Monitoring and Oversight
Effective October 1, 2026

Requirement

ODOC is responsible for monitoring ESG subrecipients to ensure compliance with applicable Federal and State requirements, the ESG Grant Agreement, this Implementation Manual, approved program activities and budgets, and other applicable ODOC requirements.

Subrecipients must cooperate with ODOC monitoring activities and provide timely access to requested records, documentation, staff, and other information necessary to evaluate ESG program and fiscal compliance. Monitoring may include desktop, virtual, onsite, fiscal, programmatic, or other reviews determined necessary by ODOC.

Procedures

1) Monitoring Approach
   a) ODOC conducts ESG monitoring using applicable HUD Community Planning and Development (CPD) Monitoring Exhibits and guidance, ODOC monitoring tools and procedures, the ESG Grant Agreement, this Implementation Manual, and other applicable Federal and State requirements.
   b) The specific exhibits, monitoring areas, and procedures used may vary based on the scope of the review, activities funded, risk, prior monitoring results, and other relevant factors.
   c) ODOC begins monitoring ESG contracts after the first six (6) months of the contract, however the ESG liaisons can initiate monitoring scheduling as early as January. Subrecipients are encouraged to respond early, as scheduling is on a first-come, first-served basis. Due to liaisons tight monitoring schedules, once scheduled, rescheduling monitoring will only occur in extreme emergency situations. Two types of monitoring exist for ODOC's ESG contracts, Fiscal and Comprehensive:
   d) ESG Fiscal Monitoring: Focuses on the financial aspect of the subrecipient's ESG contract.
   e) ESG Comprehensive Monitoring: Focuses on all aspects of the agency's ESG contract, inclusive of appropriate client files.
   f) The monitoring type that an ESG subrecipient will receive is determined by their HUD Required ESG Risk Assessment results, with one exception: New subrecipients will always have comprehensive monitoring for their first ESG grant year.
   g) Monitorings may involve an on-site visit. On site visits are done for subrecipients at least every three years, as are comprehensive monitorings.
2) Monitoring Notification and Documentation
   a) Subrecipients will be formally notified in writing, of monitoring no later than 30-45 days prior to the monitoring date. The formal notice will identify the scope of the review, monitoring period, and documentation or information that must be provided, and any pertinent due dates. The notification will also describe where in OGX documents are to be submitted.
   b) Subrecipients must submit requested documentation by deadlines established by ODOC, which is given in the formal monitoring notification, and must make additional records or

information available when requested during the monitoring. Documentation requested for monitoring may include, but is not limited to:

- ESG Policies and Procedures;
- Program participant files and eligibility documentation;
- General ledgers, financial records, claims, and supporting documentation;
- Match records;
- Procurement records and contracts;
- Personnel, payroll, and time-and-effort documentation;
- HMIS or comparable database reports and related reporting documentation;
- Performance Measure records;
- Rental assistance, lease, housing inspection, and other housing-related records;
- Shelter and program records;
- Board documentation and required certifications;
- Internal controls and fiscal policies; and
- Other records necessary to determine compliance with ESG requirements.

3) Access to Records and Confidentiality
   a) Subrecipients must provide ODOC access to records necessary to conduct monitoring and determine compliance with ESG requirements.
   b) Program participant records and other information containing Personally Identifiable Information (PII) must be handled in accordance with applicable privacy and confidentiality requirements. Subrecipients should not transmit unnecessary PII to ODOC and must redact PII when the information is not necessary for the monitoring purpose.
   c) Monitoring of victim service providers and other records subject to heightened confidentiality protections will be conducted in accordance with applicable Federal confidentiality requirements and ODOC procedures.
4) Monitoring Review
   a) ODOC may review programmatic, fiscal, administrative, and performance requirements applicable to the subrecipient and the ESG activities being conducted. Monitoring may include review of documentation, interviews with appropriate staff, observation of program operations or facilities, verification of information reported to ODOC, and other procedures necessary to evaluate compliance. The scope and method of each monitoring may vary based on the activities funded, identified risk, prior monitoring results, program performance, and other relevant circumstances.
5) Monitoring Results
   a) Following completion of the monitoring review, ODOC will provide the subrecipient written notification of the monitoring results. Monitoring results may include:
      - Problems or Corrective Actions requiring the subrecipient to correct identified noncompliance;
      - Concerns or Recommendations identifying areas in which improvements should be made; and
      - Technical Assistance provided or recommended to improve compliance, program administration, or performance.
      - When corrective action is required, ODOC will identify the required action and the deadline for completion.
6) Corrective Action and Follow-Up

a) Corrective actions will be listed in the monitoring report, with instructions and timelines. Subrecipients must respond to required corrective actions within the timeframe established by ODOC and submit sufficient documentation to demonstrate that the identified issue has been corrected. ODOC will review submitted corrective-action documentation and may request additional information, provide technical assistance, or conduct follow-up monitoring when necessary. Corrective actions remain unresolved until ODOC determines that sufficient corrective action has been completed.

7) Monitoring Closure
   a) ODOC will close the monitoring after the monitoring review is complete and all required corrective actions, if any, have been satisfactorily resolved.
   b) When the monitoring is closed, ODOC will provide written notification to the subrecipient confirming closure of the monitoring.
   c) Recommendations or technical assistance that do not require corrective action do not prevent or delay monitoring closure unless otherwise specified by ODOC.
   d) Closure of an ESG monitoring does not prevent ODOC from reviewing the same or related requirements during future monitoring or from addressing subsequently identified compliance issues.
8) Failure to Correct Noncompliance
   a) Failure to correct identified noncompliance within the timeframe established by ODOC may result in additional monitoring, required technical assistance, special conditions, withholding or restriction of reimbursement, recapture of ESG funds, or other remedies available under applicable Federal or State requirements and the ESG Grant Agreement

Requirement No. 715
ESG 26 Policy Updates
Effective October 1, 2026

Requirement

ODOC is responsible for updating ESG Subrecipients on new HUD or ODOC ESG requirements or guidance as they become available. This section provides information on new HUD or ODOC ESG requirements

Subrecipients are required to update their ESG P & P accordingly.

Procedure

This requirement will list current required updates for ODOC's ESG Subrecipients to include in their ESG Policies and Procedures.

1) National Standards for the Physical Inspection of Real Estate (NSPIRE)
   a) Effective October 1, 2026, the National Standards for the Physical Inspection of Real Estate (NSPIRE) apply to the Emergency Solutions Grants (ESG) Program, pursuant to applicable HUD regulations, including 24 CFR Part 5, Subpart G, and 24 CFR § 576.403.
   b) ESG subrecipients must continue to ensure that housing units and emergency shelters meet applicable health and safety requirements and maintain documentation of required inspections and identified deficiencies.
   c) Additional HUD Guidance: As of the publication of this Manual, HUD has not issued final ESG-specific NSPIRE implementation guidance. ODOC will provide additional instructions regarding inspection procedures, documentation requirements, and any applicable program-specific standards as HUD guidance becomes available. Subrecipients are responsible for complying with applicable federal requirements and subsequent ODOC guidance.
   d) NSPIRE Resources: HUD has published NSPIRE inspection standards and supporting resources on its official website at https://www.hud.gov/reac/nspire-standards. Subrecipients are encouraged to review these standards in preparation for implementing applicable NSPIRE requirements. HUD has also published an inspection checklist for the Housing Choice Voucher and Project-Based Voucher programs; however, this checklist has not been designated as an ESG-specific inspection form. ODOC will provide additional guidance regarding required ESG inspection procedures and documentation as HUD issues program-specific instructions.
2) Requirements from HUD:
   a) Awards to Subrecipients made under, relating to or arising out of the Federal Award will not be used to engage in illegal racial discrimination, including racial preferences.
   b) Awards to Subrecipients made under, relating to, or arising out of the Federal Award will not be distributed in a way that violates or otherwise is used to interfere with constitutional protections guaranteed for speech and religious beliefs and the free exercise of religion.
   c) Awards made under, relating to, or arising out of the Federal Award will not be used to fund any project, service provider, or organization that operates illegal drug injection sites or "safe consumption sites" in violation of 21 U.S.C. § 856, knowingly permits the use or distribution of illicit drugs on property under their control in violation of 21 U.S.C. 856(a)(2),

or knowingly distributes drug paraphernalia in violation of 21 USC 863. This is not a requirement that program participants must be sober in order to receive assistance, participate in treatment in order to receive assistance, or be evicted or exited from assistance for a first-time violation of a drug-related program policy or lease requirement.

d) All agreements or contracts made under, relating to, or arising out of the Federal Award must contain the same terms and conditions as those in the grant agreement issued by HUD. Any conflicting terms and conditions must be approved by HUD.
e) Recipient shall comply with all applicable workforce management requirements, regulations and statutes, including, without limitation, Title VII of the Civil Rights Act of 1964, 8 U.S.C. § 1324a, the Copeland "Anti-Kickback" Act, and the Drug-Free Workplace Act of 1988, as they may apply.

3) Requirements from ODOC:
   a) Returned Submissions to Subrecipients. ODOC will return submissions containing errors or requiring corrections to the subrecipient through OGX. This includes reimbursement claims, budget revisions, and other applicable documents.
   b) Subrecipients must correct and resubmit returned submissions within 10 business days of the date ODOC returns the submission. If a corrected submission is not received within this timeframe, ODOC will cancel the submission. The subrecipient must then initiate a new submission in OGX, if applicable.
   c) Exception – ESG Applications: The 10-business-day correction and resubmission requirement also applies to ESG applications; however, applications will not be canceled solely for failure to meet this deadline. Applicants are nevertheless expected to make every effort to correct and resubmit their applications within the required timeframe.