

ESG NOFO Frequently Asked Questions

Q. Will the Technical Assistance meeting on 4/13 only be "in person" or will there also be a "virtual" meeting that can be attended?

A. We will do a hybrid meeting, virtual and in-person.

Q. Do you know when the virtual details will be available? I checked the website and I did not see it listed yet.

A. We have updated the website and it is now listed.

Q. On page 8 of the NOFO it indicates the Scope of Services, one of the items says "as well as administrative activities." I do not see anywhere else in the NOFO where it mentions administrative costs, other than the % the county will be using of the funds. In previous years administrative costs were not allowed, are they allowed this year as part of our funding request? If yes, is there a cap 10%/15%?

A. The following is from page 2 of the NOFO where it clearly articulates that the 7.5% of remaining funds (Admin) are for PBC's administrative costs:

Funding Available Funding availability for FY 2022-2023 has not yet been determined but is estimated to be \$546,649. All dollar amounts are subject to Federal budget approval. ESG recipients are required to consult with the local Continuum of Care (CoC) when determining how to allocate ESG funds. Palm Beach County's (PBC's) CoC, known as the Homeless and Housing Alliance (HHA), has allocated FY 2022-2023 ESG funds as follows:

- \$75,000 for PBC's CMIS activities;
- 7.5% of remaining funds (which is approximately \$40,998) for PBC's administrative costs;
- Of the remaining funds (which is approximately \$410,743)
 - 60% (\$258,391) for emergency shelter activities
 - ♣ Priority to be given to emergency shelter for homeless families with children
 - 40% (\$172, 260) for rapid re-housing for individuals and families

Q. I have just tried to mark the section *Site Control & Compliance with Zoning & Land Use* as complete because I uploaded my county-owned building letter. However, I received an error message stating I must upload something to the non-county-owned section (number 13). Please confirm what you would like me to do. To be clear, we are county-owned and I uploaded the appropriate letter for number 14 already.

A. We are looking into this and will upload an answer as soon as possible.

A. This issue has been resolved.

Q. We are applying for the NOFO for the ESG Program for our Western Shelter. One of the items the NOFO is asking for is the "Agency ESG Caper report." We ran the report, but it comes out as 40 separate excel spreadsheets (for each question). I don't think that can be what the NOFO is looking for as I don't think they will want reviewers to have to open 40 files to review the answer to each question. Is there some way that this "rolls-up" to an actual condensed report? Not sure if we are running it correctly.

A. You can change the workgroup in HMIS to HMIS: Admin and navigate to the reports workspace. Run your CAPER report utilizing the CSV – CAPER – 2022 option. Once your report is completed successfully, navigate to the APR/CAPER Review option under HMIS Exports. This will allow you to see your report and export to PDF.

Q. We cannot download the budget template in SAMIS. A window opens when the link is clicked, but nothing appears. Can you check that the document is linked?

A. This issue has been corrected in SAMIS.

Q. (Rapid Re-Housing Only) has a limit of 3,000 characters. Last year, the county expanded this limit to 7,000 characters (at our request) in order to accommodate a sufficient answer to all seven bullet points. We respectfully request that the character limit be expanded again this year, to at least 6,000 characters.

A. The character count for Question 3 on the ESG application has been expanded to 7000 characters.

Q. Within the "Internal Control Questionnaire", the fillable blocks do not line up. The download form in grant website is missing one of the questions under Property and Equipment. Question 8 is missing although it was included on the form in the paper application. Is it possible to reload the form in the online application? If not, can I manually add the question and the boxes?

A. There appears to have been a problem with the document within SAMIS that has been repaired. The fillable document is listed under the resources section.

Q. In last year's application we got an approval to allow 5000-word count for question 2 of the project narrative, is it possible again to get that approval or are we limited to 3000?

A. The character count for Question 2 of the project narrative on the ESG application has been expanded to 5000 characters.

What is the password to the TA ESG Workshop on 4/13/22?

The password to the TA ESG Workshop on 4/13/22 is Password: 2Knpu3mb

Any updates on the site control?

The site control has been fixed

I am reaching out to you concerning rental/utility assistance for those whose immigration status it's not USA citizens or residents. Would we be able to determine eligibility for those for the ESG Program?



August 16, 2016

The Personal Responsibility and Work Opportunity Act of 1996 and HUD's Homeless Assistance Programs

On August 11, 2016, the U.S. Department of Housing and Urban Development (HUD), the U.S. Department of Health and Human Services (HHS), and the U.S. Department of Justice (DOJ) issued a joint letter to remind recipients of federal financial assistance that they must not withhold certain services based on immigration status when the services are necessary to protect life or safety. This guidance provides additional information to recipients of funds under HUD's Homeless Assistance Programs – the Emergency Solutions Grants (ESG) and the Continuum of Care (CoC) Programs – about how this joint letter and the Personal Responsibility and Work Opportunity Act of 1996 ("the Act"), the Act on which this letter is based, applies to assistance funded through these programs. For more information about these programs, please see 24 CFR Part 576 and 24 CFR Part 578.

In the Act, Congress restricted immigrant access to certain federal public benefits but also recognized exceptions to protect life or safety, based on a 3-part test. There are certain types of federal assistance that are not subject to the Act's restriction on access to public benefits based on immigration status. This includes activities that: (1) deliver in-kind services at the community level, (2) are necessary for the protection of life or safety, and (3) do not condition the provision of assistance on the potential program participant's income or resources. The remainder of this document covers the types of assistance funded through the ESG and CoC Programs that are covered by this life or safety exception.

HUD has determined that the following forms of assistance meet this three-part test and, therefore, are not subject to the Act's immigration-based restrictions:

- Street Outreach Services
- Emergency Shelter
- Safe Haven
- Rapid Re-Housing

Transitional housing meets the 3-part test and falls within the exception for life or safety, and therefore must be provided to persons without regard to immigration status, when the recipient or subrecipient owns or leases the building used to provide transitional housing. However, in transitional housing programs where the recipient or subrecipient provides rental assistance payments on behalf of program participants, this type of program does not fall within the life or safety exemption because the rental assistance provided is required by regulation to be based on the program participant's income and, therefore, does not meet the 3-part test.

HUD reminds nonprofit organizations that are recipients of CoC or ESG Program funds that the Act does not require nonprofit charitable organizations to verify the immigration status of applicants for federal, state, or local public benefits.¹

¹ For more information about verification and the nonprofit exemption, see Department of Justice, Interim Guidance on Verification of Citizenship, Qualified Alien Status and Eligibility Under Title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, 62 Fed. Reg. 61344, 61345 (Nov. 17, 1997).

I would like to know if we can submit the grant application for two concepts of assistance. For example, one for the homelessness prevention and for the re-rapid housing component?

Please note, that agencies can only apply for one funding category.

Do I have to separate how we will assist the clients with each of the concepts in the narrative?

Only one concept is allowed per agency.