

Can you be more specific about the written service standards? Is there a template or could our CoC (Continuum of Care) borrow from other CoCs?

Developing and maintaining written service standards for program components is a HUD requirement for both ESG and HUD CoC Program funding. While the MSHDA [ESG Policy Manual](#) provides a foundation for ESG service standards, each CoC is responsible to outline expectations for service delivery by component type. Under ESG, these components are Street Outreach, Emergency Shelter, Homelessness Prevention, and Rapid Re-Housing. CoCs are encouraged to consider these written standards as guidance that exists separate from specific funding requirements (i.e. ESG or HUD CoC), but instead as a means to ensure that any agency completing this work is doing so in accordance with the agreed upon standards. Please see page 4 of the [ESG Action Plan Checklist](#) for additional guidance on written standards. CoCs can reference or replicate existing examples from other CoCs (both in Michigan and nationally). If CoCs are willing to share standards to aid other CoCs in developing their own, please notify the [assigned Homeless Assistance Specialist](#).

Can you clarify what you're looking for in the CoC Fair Housing Policy that would be different from the Anti-Discrimination Policy?

Each CoC must have both anti-discrimination and Fair Housing policies. These may exist within the same document or may be represented by two separate documents. However, it is important to note that anti-discrimination and Fair Housing are not interchangeable concepts and must be affirmed distinctly by each CoC. The federal Fair Housing Act, as well as Michigan's state laws, protect people from discrimination when renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in housing-related activities. Anti-discrimination policy expands on this by addressing the affirmation and implementation of items such as [HUD's Equal Access Rule](#), and highlighting the prevention of involuntary family separation and limited access to services based on participation in religious activities. CoCs can reference or replicate existing examples from other CoCs (both in Michigan and nationally). If CoCs are willing to share these policies to aid other CoCs in developing their own, please notify the [assigned Homeless Assistance Specialist](#).

Given Question 6, do you anticipate performance of HUD CoC Program grants will be scored in the ESG Exhibit 1?

No, the Exhibit 1 is not intended to review the performance of HUD CoC Program grants. Question 6, parts b and c, ask the CoC to detail how expenditure rates are tracked for HUD CoC Program funding and how much of the CoC's federal award was expended in the last completed fiscal year. These questions are intended to demonstrate efforts made by the CoC to effectively monitor and utilize its available federal resources. Additionally, the Exhibit 1 is not a scored document and does not impact the CoC's MSHDA ESG allocation.

For the Racial Demographics Report (Question 13), do you recommend that CoCs use other additional local data (i.e., United Way's ALICE report, Census data) to compliment this report?

CoCs are welcome to provide additional data sets or supplemental narrative regarding the Racial Demographics Report, but this is not a requirement.

In prior years, a MSHDA ESG MOU (Memorandum of Understanding) was also required with the Exhibit 1. Is an MOU not required this year? And what about other documents that were previously required for the Exhibit 1?

The MSHDA ESG MOU is still required but will be part of the MSHDA ESG application instead of the Exhibit 1. Other previously required documents, such as the Key Person Security Agreement and the HCV (Housing Choice Voucher) Lead Agency MOU, are currently under review and may also be required as part of the application. MSHDA ESG application documents will be released Friday, June 10.

In the past our CoC's ESG Fiduciary did not create an ESG contract with subgrantees and only depended on the MSHDA ESG MOU (Memorandum of Understanding). Is that sufficient?

No, MSHDA ESG Fiduciaries must complete agreements or contracts with each subgrantee. This diminishes risk on behalf of the Fiduciary and clearly outlines expectations to subgrantees for expenses and reporting. Fiduciaries are welcome to leverage language from the grant agreement they complete with MSHDA for these same funds.

Do you have an idea when we'll know what our ESG allocation will be?

MSHDA anticipates that ESG allocations by CoC (including local planning bodies within the Balance of State CoC) will be released in June. This is contingent upon HUD's notification of award and MSHDA's internal review of the formula for allocation.

Does MSHDA have plans to re-incorporate Pay for Performance in the future?

Pay for Performance is a historic practice where MSHDA provided an additional portion of ESG funds to CoCs (including local planning bodies within the Balance of State CoC) based on specific performance measures. This practice was temporarily suspended during the FY (fiscal year) 2020-2021 grant cycle due to the significant influx in COVID-19 funding and continued its suspension through this application round. MSHDA will revisit Pay for Performance ahead of the FY2023-2024 ESG application.

For the MSHDA ESG application, do you anticipate any changes in the list of required documents list for subgrantees?

MSHDA does not anticipate substantial changes to the list of required documents for each subgrantee. This information will be confirmed with the release of MSHDA ESG application documents on Friday, June 10.

For Question 2, can we list more than one agency in the space provided on the PDF, or do we need to attach more pages? For example, how can we list multiple PHAs?

Please provide additional pages to list all relevant CoC members.

Given Question 12, what is the relationship and authority between the Fiduciary and the CoC? Or is this the responsibility of the CoC to determine? Is the CoC responsible for ESG oversight?

The CoC (or local planning bodies of the Balance of State CoC) is responsible for ESG oversight, including the identification and confirmation of the agency that will act as Fiduciary for MSHDA ESG funding. The Fiduciary is responsible for specific activities of the CoC's grant allocation, such as routine financial status reports, reimbursements or advances to subgrantees, monitoring of subgrantees, etc. Additionally, the Fiduciary is responsible to relay grant status updates and subgrantee financial performance information to the CoC for discussion.

By moving the timeline for the Exhibit 1 prior to the local application process and NOFA release, is MSHDA treating the responses like the HUD CoC Program's collaborative application? Will our local allocations be based on our answers in the Exhibit 1?

The Exhibit 1 ensures that MSHDA ESG funding is leveraged in effective coordination with all other resources, such as HUD CoC Program funds, and enhances the strategic use of funding for identified needs and priorities. Some of the information is similar to what is found in the HUD CoC Program's collaborative application and this is intentional for overall alignment. However, the responses within the Exhibit 1 do not have any bearing on local allocation decisions as ESG funding is non-competitive and formula-based.