

Q: Are gas cards eligible as a transportation expense when no public transportation is available?

A: It's not likely that gas cards would be eligible per HUD but agencies can consider ride share account costs (eligible per waiver) or staff providing transportation directly (if allowed by agency).

Q: If you have both MSHDA and HUD direct allocation ESG-CV funding, is the material covered <u>in the</u> <u>webinar (3/1/22)</u> applicable to both or only MSHDA ESG-CV (ex. \$500 signing bonus cap)?

A: This presentation is specific to MSHDA ESG-CV but the waivers referenced are applicable to both MSHDA ESG-CV and direct ESG-CV allocations. Please check with your funder for further clarification on requirements and expectations.

Q: Can you clarify caps around Rental Assistance for MSHDA ESG-CV? Our understanding is that there is a cap of \$3,000 for 6 months of rent.

A: In general, monthly rental assistance is limited by FMR (Fair Market Rent) and rent reasonableness. MSHDA ESG-CV has a waiver that allows up to 120% of FMR but still requires rent reasonableness. There is no cap for total rental assistance under ESG-CV (either number of months or total costs). MSHDA's annual ESG is capped at 9 months of rental assistance but can be extended with MSHDA approval. Additionally, annual ESG rental assistance cannot exceed 24 months within a 3-year period. Rental arrears are capped at up to 6 months for both ESG and ESG-CV.

Q: Can hazard pay incentives be paid out as a bonus? Does this need to be approved by our fiduciary and/or MSHDA?

A: The method for hazard payment is determined by the agency's policy. Hazard pay can be added to an employee's base pay or given as a one-time bonus. Agencies can consider hazard pay and additional health and safety training for any staff working directly with community members to prevent or respond to the spread of COVID-19 among those who are experiencing homelessness or at risk of homelessness. Agencies must have a hazard pay policy (or amended Workers Compensation policy) that details the amount, length of time, eligibility, determination, and recordkeeping procedures for hazard pay. Any staff receiving hazard pay must have a position description that aligns with eligibility within the agency policy. Provision of hazard pay must be reasonable and equitable. Hazard pay policies should be submitted to MSHDA Homeless Assistance Specialist for review prior to agency reimbursement from MSHDA ESG-CV. Additional guidance can be found in <u>HUD's office hours</u> and examples of hazard pay policies can be found <u>here</u>.

Q: To clarify on the hazard pay, we could pay the maintenance staff out of ESG-CV monies, even if their salary is not billed to ESG-CV?

A: Staff do not have to be funded by ESG, ESG-CV, or HUD CoC funds to be eligible for ESG-CV hazard pay. However, staff must meet the requirements established by the agency's hazard pay policy. Additional guidance can be found in <u>HUD's office hours</u> and examples of hazard pay policies can be found <u>here</u>.

Q: If our budget includes landlord incentive, do we need to amend our budgets to include the landlord referral bonus?

A: No, budgets do not need to be amended if agencies have funding budgeted for landlord incentives. Please notify your assigned <u>Homeless Assistance Specialist</u> if including a landlord referral bonus as an incentive.



Q: Can you talk more about purchasing beds and linens if there are any creative ways to not get them back due to bed bugs etc.?

A: HUD has published <u>disposition and recordkeeping requirements</u> for ESG-CV furniture and household furnishing purchases. Please note that subrecipients must have policies and procedures in place to determine whether equipment purchased by the project (in this case, ESG-CV) is no longer needed. For example, agency policy could determine that furnishings such as mattresses or bed linens would not retain sufficient value to continue to be used for the original program for hygiene reasons.

Q: is it possible to get clarification on eligible cost for sublease/master lease arrangement? I am wondering what happens to the cost if a unit stays vacant for few weeks during turnover.

A: ESG subrecipients can contract directly with another nonprofit agency (making the nonprofit the sponsor) or with a landlord (making the subrecipient the sponsor). The sponsor holds the lease agreement with the landlord and then creates sub agreements with the tenants. The sponsor would cover 100% of the rental costs with the landlord and then, through the sub agreements, determine the tenant's share of the rent (for example, what percentage of their income would they be responsible to pay to the sponsor). Any vacancy created by unit turnover should be budgeted within the total rental assistance costs and would be eligible for reimbursement.

Q: Are vaccine incentives covered only under the shelter component or can it also be covered under RRH/Prevention service? If so under which sub-category?

A: Vaccine incentives are eligible under essential services for street outreach and emergency shelter, and they are eligible under housing relocation and stabilization services for rapid re-housing. This is included in the <u>MSHDA Policy and Procedure Waivers document</u> on the <u>MSHDA ESG website</u>.

Q: Can we pay vaccine incentives retroactively for folks that have chosen to get vaccinated?

A: No, HUD has clarified that vaccine incentives cannot be applied retroactively and can only be provided for folks who are currently unvaccinated.

Q: What would it look like to assist with credit repair?

A: Under the rapid re-housing essential services waiver, subgrantees can contract with credit repair professionals or those licensed in financial management to serve households seeking credit repair support as part of life skills support.

Q: Are clients that are receiving ESG assistance eligible for ESG-CV Moving Costs? Our understanding is not allowed as this would be "double dipping" (and that this would create complications for HMIS) but wanted to confirm as this would be helpful for our community.

A: Households who are eligible for both ESG and ESG-CV can receive services from both, so long as the services are not duplicated between sources. MSHDA and MCAH have collaborated to provide additional guidance for tracking these instances in HMIS, which will be released shortly. Please reference the full <u>MSHDA</u> <u>Policy and Procedure Waivers</u> document for additional opportunities.

Q: Regarding the essential services waiver for rapid re-housing households, is there a maximum amount for dental work?

A: HUD regulations do not outline a maximum amount allowed but due diligence is necessary to determine that the costs are reasonable. As MSHDA does not have explicit limitations on these costs at present, subgrantees are responsible to ensure that costs are reasonable and households meet eligibility to receive these services.



Q: Are you able to provide some clarity around ESG-CV expenses following 9/30/2022 (i.e. can eligible expenses be obligated but not fully allocated past 9/30/2022)? Should leases not extend past 9/30/22 if they are paid via ESG-CV? Also, HUD regulations allow for paying last month's rent. If the lease goes beyond 9/30/2022, can we pay and charge the last month's rent to the grant when client moves in before 9/30/2022?

A: HUD has provided <u>recent guidance</u> regarding continuation of services beyond ESG-CV, specifically for households engaged in rapid re-housing. Please review and submit any additional questions to your assigned <u>Homeless Assistance Specialist</u>.

