

2020

SUBRECIPIENT TRAINING

ESG COVID-19



Cobb County CDBG Program Office
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TRAINING AGENDA



- ESG CV Eligible Activities
- Monthly Reporting
- Environmental Review
- Income Limits: ESG-CV
- Recordkeeping
- Monitoring

- Reimbursements
- Repayments
- Coordinated Assessment Overview
- Q & A

ESG-CV Eligible Activities

Funds awarded under the ESG-CV Program **must be utilized to prevent, prepare for, and respond to the coronavirus.**

ESG Program recipients may use Street Outreach and Emergency Shelter funds for essential supplies and services to reduce the spread of infectious disease in their programs.

Emergency Shelter – Shelter Operations:	
Maintaining a sanitary shelter environment will help to keep staff and participants healthy. Listed below are supplies and equipment that are eligible Shelter Operations costs, which could be useful to	
Supplies	Cleaning supplies such as bleach, disinfectant wipes, scrubbers, mops
	Protective equipment such as masks, disposable gloves
	Program participant needs such as bed linens, towels, hand sanitizer, soap, tissue packets
Furnishings	Cots, room dividers
Equipment	Washers, dryers, portable handwashing stations
Transportation	Train or bus tokens, taxi or rideshare for program participant travel to and from medical care
Street Outreach	
Engagement – Urgent physical needs	Hand sanitizer, soap, tissue packets, masks
Engagement - Equipping staff	Masks, disposable gloves, hand sanitizer, other personal protective equipment
Case management – Referrals	Coordinating medical care
Transportation	Train or bus tokens, taxi or rideshare for program participant travel to and from medical care
Expanded Staffing	
Hiring additional staff to support infectious disease preparedness.	
<i>Note: Be sure to provide staff with training about precautions they can take to stay healthy, stop the spread of germs, and to stay home if they are feeling sick.</i>	

ESG-CV Eligible Activities

Homelessness Prevention	
To prevent an individual or family from becoming homeless or regain stability in current housing/permanent housing.	<p>Available to Persons: At-risk of becoming homeless and below 50% AMI</p> <p>Activities: Housing Relocation and Stabilization Services Short and Medium-Term Rental Assistance</p>
Rapid-Rehousing Activities	
To help a homeless individual or family move into permanent housing and achieve housing stability.	<p>Activities: Housing Relocation and Stabilization Services Short and Medium-Term Rental Assistance</p>

Re-Evaluation for Homeless Prevention assistance waiver:

The required frequency of re-evaluations for homelessness prevention assistance under section 576.401(b) is waived for up to 2-years as of March 31, 2020, but the Subrecipient must conduct the required re-evaluations not less than once every 6 months.

MONTHLY REPORTING: ESG-CV




ESG-CV reports are due by the **15th** of each month for services rendered the prior month.

- ❑ Reporting provides client-level data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness.
- ❑ Comparable databases for victim services providers.

Enrollment Demographics

3/1/2017 to 3/31/2017



Report Criteria:

Organizations: My Training Organization

Programs: My Training Org ESG - Shelter

Age Range: 0-17,18-45,46-62,63

	Unduplicated		Duplicated	
	#	%	#	%
<input type="checkbox"/> Race	29	100.000%	29	100.000%
American Indian or Alaska Native	4	13.793%	4	13.793%
Asian	2	6.897%	2	6.897%
Black or African American	4	13.793%	4	13.793%
Multi-Racial	9	31.034%	9	31.034%
White	10	34.483%	10	34.483%
<input type="checkbox"/> Ethnicity	29	100.000%	29	100.000%
<input type="checkbox"/> Gender	29	100.000%	29	100.000%
<input type="checkbox"/> Age Range	29	100.000%	29	100.000%
<input type="checkbox"/> Religion	29	100.000%	29	100.000%



ENVIRONMENTAL REVIEW

- ER Purpose: assess the environmental impact of activities.
- ER prepared by CDBG Program Office.
- ER required for HUD Programs **prior** to providing services.

REQUEST FOR ENVIRONMENTAL REVIEW

SUBRECIPEINT MAY NOT UNDERTAKE ANY ACTIVITY WITH HUD OR NON-HUD FUNDS WITHOUT A COMPLETED ENVIRONMENTAL REVIEW.

Date of Request:

Name and Agency:

Funding Source: ☐ CDBG ☐ HOME ☐ ESG

Property Address:

Project Description:

Project budget: \$

PROPOSED PROJECT DESCRIPTION:

☐ DPA ☐ TBRA ☐ Supportive Services ☐ Operating Costs ☐ Acquisition (Property)
☐ Demolition ☐ New Construction ☐ Rehabilitation

INCOME LIMITS: ESG-CV

2020 ESG-CV Income Limits

Household Size	30% Area Median Income	50% Area Median Income
1	\$17,400	\$28,950
2	\$19,850	\$33,100
3	\$22,350	\$37,250
4	\$24,800	\$41,350
5	\$26,800	\$44,700
6	\$28,800	\$48,000
7	\$30,800	\$51,300
8	\$32,750	\$54,600

INCOME VERIFICATION:

ESG-CV homeless prevention client's income should be verified prior to providing assistance.

Emergency Shelter and Street Outreach programs do not have specified income limits.

Subrecipients should use the current income limits at the time of verification.

Household income no greater than:

- 50% AMI (ESG-CV)
- 30% AMI (ESG)



RECORDKEEPING

Every Subrecipient is required to establish and maintain **at least three major categories** of records:

Documenting Eligibility – Subrecipient should establish a procedure for how eligibility will be documented for each client.

Case File Organization – Case file checklist, application for services, consent forms, proof of identification. Documents should be tabbed and placed in order of checklist.

Administrative Records - Files and records that apply to the overall administration of the Subrecipient's activities..

RECORDKEEPING: CLIENT FILE ORGANIZATION



Client files should contain the following:

- Client File Checklist
- Application for services (must include if the services are needed as a result of COVID-19)
- Consent Forms
- Proof of Identification
- Proof of Residence
- Income Verification Documents
- Income Limits
- Environmental Review
- Housing Eligibility Documentation
- Additional Services Documentation (lease and lease addendums, assistance contracts, HUD-1 statements, etc.)

PROGRAM MONITORING

The purpose of monitoring is:



To ensure the compliance with all regulations governing administrative, financial, and programmatic grant activities.

To ensure Subrecipients achieve performance objectives on schedule and within budget.

MONITORING: RISK ANALYSIS

At the beginning of each Program Year, risk analyses are conducted for all Subrecipients with active grant funding.

The Risk Analysis process is used to rank high and low risk Subrecipients in the following areas:

- Program size
- Program expenditures
- Number of employees
- Audit findings
- Programmatic compliance issues



FORMS OF MONITORING

Desk Review - in-house file review of previous documents submitted by the Subrecipient.

On-site Visit - review of the Subrecipient's programmatic, administrative, and financial records at an agency's service or administrative location.

Documents review can include: contractual agreement, progress reports, reimbursement requests, documentation of previous monitoring.

File reviews will be a random sample of client files.

PROGRAM MONITORING RESULTS

The framework for analyzing monitoring results are:

- **Finding** - areas of statutory or regulatory noncompliance that must be addressed immediately.
- **Concern** - issues that are not instances of statutory or regulatory noncompliance but may result in noncompliance if they are not addressed.
- **Corrective Action** - steps that must be taken to correct instances of noncompliance, poor management, or poor performance that are identified from the monitoring
- **Recommendation** - comments about areas where the funded entity can improve program performance.

SUBRECIPIENT AGREEMENTS



Subrecipients will be provided Agreements that provide guidance for funded activities. The agreement:

- Fulfills legal requirements by presenting the regulations of the grant program and the conditions under which funds are provided;
- Provides guidance for monitoring Subrecipient performance and;
- Provides an essential vehicle for training the Subrecipient's staff.

WHAT'S IN YOUR AGREEMENT?

- Duration of the Agreement
- Environmental Review Requirements
- Record Keeping/Reporting Requirements
- Program Income
- Reimbursement Process
- Repayments



- Certifications
- On-going Obligations
- Scope of Work
- Audits
- Project Budget
- Resources
- Match requirements

DURATION OF AGREEMENT

Subrecipient Agreements remain in effect during any period that the Subrecipient has control over any grant funds including Program Income (PI).

Agreement Effective Date	08/11/2020
Deadline for Expenditure of Funds	08/31/2021
Agreement Termination Date	07/31/2021
Deadline for Receipt of Final Reimbursement Request	08/31/2021

Note: Budget amendments may only be requested once per quarter.

ON-GOING OBLIGATIONS



Subrecipients must abide by the terms of the Agreement and regulations for all projects initiated until funds are expended.

Subrecipient Agreement will continue to govern the relationship between the Subrecipient and the County.

CERTIFICATIONS

Subrecipients must certify to abide applicable provisions, including:

- Conflict of Interest
- Debarment
- E-Verify
- Lobbying
- Hatch Act (*prohibits political activities*)
- Insurance
- SAM.gov Registration

SCOPE OF WORK

The Scope of Work defines the expectations of services through the Agreement and includes:

- Detailed description of the work to be performed
- Deadline for completion of the work
- Performance Outcomes
- Project Budget



REIMBURSEMENT PROCESS

Subrecipients are required to submit monthly bills together with proper support documentation.

Reimbursement payments will be processed using the County's 30-day payment schedule.

Subrecipients **cannot** hold request(s) for reimbursements for more than two months after service is provided.

Reimbursement requests should be submitted to:
cobbcdbgpayers@cobbcountycdbg.com

REIMBURSEMENT DOCUMENTATION

The following is a list of required reimbursement documentation:

- Monthly Expenditure Report signed by Executive Director/Lead Administrator/Supervisor
- Itemized list of program reimbursables and cost
- Supporting documentation (copies of checks, receipts, bills)
- Documentation which identifies payment was made in advance by the organization
- Verification of Client Eligibility

GRANT REPAYMENTS



Subrecipients must repay grant funds for activities:

- Applicable eligibility requirements
- Projects that are deemed ineligible
- Projects that are terminated before completion

Payment must be made to the County within **30 days** of notification of violation.

COORDINATED ASSESSMENT FOR ESG-CV PREVENTION ACTIVITIES

ESG regulations require subrecipients to work with the local Continuum of Care (CoC) entity to implement a system of coordinated assessment for all ESG funded programs.

- ***The purpose of a Coordinated Entry (CE) System*** is to provide the quickest access to the most appropriate housing to every household experiencing or at-risk of homelessness through a standardized assessment and referral process.
- The Marietta/Cobb Continuum of Care has implemented a coordinated assessment process for each ESG-CV funded prevention program. **This process is effective on October 1, 2020.**
- The ESG-CV prevention funded program must conduct an initial evaluation to determine each individual's or family's eligibility for housing assistance. These evaluations must be conducted in accordance with the coordinated assessment requirements.

STEPS FOR COORDINATED ENTRY

1. Individuals seeking housing resources will contact a Point of Entry organization: The Salvation Army, MUST Ministries, Zion Keepers, and Travelers Aid of Metropolitan.
2. Intake workers will utilize a pre-screening tool to determine if the applicant meets the broad criteria for prevention assistance.
3. If so, the Intake worker enters the Crisis Assessment in HMIS (Client Track).
4. Applicants will automatically be placed on a Prevention Prioritization List in Client Track.
5. The Coordinated Entry Specialist will contact each organization utilizing ESG Prevention funds weekly to determine the number of referrals they want for that week. The CE Specialist then selects the applicants with the highest rating on the Prioritization list that are appropriate for that organization's program, based on the qualifications provided by that organization. Referrals are made through Client Track.
6. The organization then contacts the client and conducts their organization's screening and intake. The organization determines if the applicant is eligible for their services and follow their organization's established procedures for assistance.

A CoC Coordinated Entry training will be held on September 30, 2020, from 1:00PM to 4:30PM. All ESG-CV prevention subrecipients are required to attend.

CDBG PROGRAM OFFICE CONTACT



CDBG Program Office

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