



Tehama County
Continuum of Care

Emergency Shelter Operations Manual

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I. Introduction

A. Overview

The Emergency Solutions Grant (ESG) Program is a federal program operated by the U.S. Department of Housing and Urban Development (HUD) to make grants to states, local governments, and territories for the purposes of funding activities that directly serve people experiencing homelessness, including people at risk of homelessness.

The California Department of Housing and Community Development (CA HCD) is a direct recipient of ESG from HUD. CA HCD administers an annual allocation of ESG and an additional one-time allocation of ESG made available under the CARES Act.

Service Providers located within the geographic area covered by the Tehama County Continuum of Care (Tehama CoC) may receive ESG funding either directly from CA HCD or as a subgrantee of Tehama CoC, through its designated Collaborative Applicant/Administrative Entity (CA/AE).

B. Applicability of this Operations Manual

This manual provides the structure under which ESG-funded Emergency Shelter (ES) projects operating within Tehama CoC's geographic area must be designed and implemented, and may be applicable, in whole or in part, to operations of ES or ES-comparable projects funded through other funding programs administered locally by Tehama CoC through its designated CA/AE.

C. Applicability of Federal Requirements

ESG-funded projects are required to adhere to all applicable federal laws, statutes, and regulations, which include but are not limited to the ESG Program Interim Rule ([24 CFR Part 576](#)) and the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ([2 CFR part 200](#)). Elements of these requirements are incorporated into this Manual; however, project operators are strongly encouraged to independently review all applicable requirements independent of this document.

D. Applicability of Other Regulations

Projects funded under other state or federal programs administered by Tehama CoC may be subject to other statutes and regulations. Project operators are responsible for independently reviewing all applicable requirements as described in the Standard Agreement executed with Tehama CoC's designated CA/AE.

II. Project Requirements

A. Overview

ES is an effective and efficient approach for moving people from homelessness to permanent and stable housing. The requirements in this Operations Manual are intended to ensure that subrecipients create ES projects that:

- Comply with all applicable federal laws, statutes, and regulations
- Provide assistance that is tailored to each participant's specific needs and housing barriers
- Implement human-centered best practices to providing services that are low barrier and reflect the Housing First approach. For more information on Housing First, see Tehama CoC's [Housing First Policy](#).

B. Written Policies and Procedures

Projects are required to develop and implement written Policies and Procedures (P&Ps) that fully detail their ES operations. At a minimum, they must include the following content pieces:

1. **Written Standards:** All elements of the P&P must be consistent with the ESG Written Standards implemented by CA HCD and Tehama CoC. ES projects must comply with Written Standards via both the P&P and project implementation. When a conflict occurs between ESG and CoC Written Standards documents, subrecipients must consult with Tehama CoC to resolve the conflict.
2. **Coordinated Entry integration.** The P&P must detail how the project participates in Tehama CoC's Coordinated Entry process to ensure that participants are connected quickly to the resources available via Coordinated Entry, including, but not limited to, ESG-funded permanent housing. For more information, refer to Section II.C, "Coordinated Entry."
3. **Participant eligibility.** The P&P must detail how the project establishes and documents participant eligibility. The P&P must also acknowledge that, as required by the ESG Program Interim Rule, lack of third-party documentation must not be a barrier to enrollment in ES projects. For more information, refer to Section III, "Participant Eligibility."
4. **Suite of services.** The P&P must define:

The full suite of services that will be provided by the project, which may only include activities eligible for ES projects as listed in Section IV, "Activity Eligibility."

The project's process for assessing each participant's individual strengths and housing barriers, then developing an individualized case management plan that incorporates those strengths and housing barriers to quickly return the participant to safe, stable permanent housing

5. **Staffing pattern.** The P&P must detail the project's staffing pattern, including:
 - a. Estimated caseloads for staff providing case management, which must be sufficient to meet any commitments or projections regarding

- the number of participants to be served by the project during a given period
- b. Other staff who are providing services funded by the project other than case management, including staff who are responsible for providing essential services like food services and staff who are responsible for maintaining the facility such as maintenance workers
 - c. A process for entering participant data into and maintaining participant data in the local Homeless Management Information System (HMIS) in an accurate and timely manner.
6. **Housing problem-solving.** The P&P must detail how the project will provide the following housing problem-solving (HPS) approaches. HPS, including standard interventions and recordkeeping requirements, is defined more fully in CA HCD's [ESG Housing Problem Solving Policy](#). ES projects are required to provide the following HPS services:
 - a. *Diversion:* the project must attempt to provide diversion services to all participants who request ESG-ES services at the time the participant initially requests services
 - b. *Rapid exit:* the project must offer rapid exit services to all participants enrolled in the project who are not already receiving rapid exit services from another project or provider. Note: the project should continue to attempt to provide rapid exit services to each participant until both project and participant mutually agree that the participant will no longer benefit from them
 7. **Termination and appeals.** The P&P must include a participant termination and appeals process. For more information, refer to Section II.F, "Termination and Appeals."
 8. **Other requirements.** The P&P must meet any other requirements in documents other than this Operations Manual. Other sources of requirements may include but are not limited to federal laws, statutes, and regulations, CA HCD policy regarding federal awards generally and the ESG Program specifically, and the Tehama CoC Policies and Procedures Manual.
 - a. In the event of a conflict between requirements in this Manual and another document, or between this Manual and another applicable body of policy, subrecipients must consult Tehama CoC to resolve the conflict.
 9. **General operations.** In addition to the other requirements in this Operations Manual, the P&P must provide sufficient information about the operations of the project that a person not familiar with the project could reasonably reconstruct it from the P&P.
 10. **Approval.** Projects are required to adhere to the following approvals for their P&Ps:
 - a. P&Ps must be submitted for approval to Tehama CoC and, where applicable, must also be submitted to CA HCD for approval.

- b. Projects are not required to have approved P&Ps before beginning to spend ES funds, but Tehama CoC and/or CA HCD may choose not to issue reimbursements to any project before its P&Ps are approved.
- c. Where applicable, CA HCD is the sole arbiter of whether P&Ps meet ESG requirements. Otherwise, Tehama CoC is the sole arbiter of whether P&Ps meet the requirements in this Manual and/or any other requirements to which an ES project is subject.
- d. P&Ps are not approved until the project receives written, signed approval from the relevant approving agency, either on the P&Ps or in a separate letter.
- e. Either approving agency may withdraw their approval at any time via a written, signed statement if it discovers that a project's implementation differs materially from its P&Ps.

C. Coordinated Entry

Coordinated Entry provides a critical path from homelessness to housing for many people experiencing sheltered homelessness. Projects are required to fully comply with Tehama CoC's Coordinated Entry Policies and Procedures and are expected to facilitate connections to Tehama CoC's Coordinated Entry System (Tehama CES) for all participants enrolled in ES projects, except where to do so would compromise a participant's safety. Projects are encouraged to consult with Tehama CoC's HMIS Lead Agency to develop procedures for ensuring that individuals and families who enter Tehama CES through other entry points can be connected to ES.

D. Termination and Appeals

Projects are required to develop a termination and appeals policy. This policy must comply with all requirements in [24 CFR 576.402](#), "Terminating Assistance," which includes but is not limited to a provision that participants' assistance be terminated only in the most severe cases.

Additionally, this policy must detail the steps the project will take to ensure that any participant who is terminated from the project does not return to an unsheltered location as a result of that termination.

This policy must also comply with any additional applicable requirements, which can most commonly be found in the following places:

1. The project's application to Tehama CoC or CA HCD and the grant award or contract/agreement for the project with the relevant funding agency
2. ESG Written Standards developed by CA HCD or Tehama CoC
3. Tehama CoC Written Standards insofar as they apply to ES projects

E. Length of Stay

No later than July 1, 2024, ES projects must do away with policies that impose either a minimum or maximum length of stay for participants. Existing ES projects that have previously imposed such limits should consult with Tehama CoC, and where directly

funded through CA HCD, with CA HCD to request technical assistance with transitioning between models.

F. Recordkeeping and Documentation

Projects are required to comply with the "Recordkeeping and Reporting Requirements" section of [24 CFR 576.500](#) as they apply to ES.

G. Tehama CoC Form Kits

To provide a **template for required Intake Procedures** and streamline projects' ability to maintain complete client files that comply with the documentation standards in [24 CFR 576.500](#), Tehama CoC has developed a series of Form Kits which are available on the [Provider Resources](#) page of the CoC's website.

ES Projects operating within Tehama CoC's geographic area are strongly encouraged to utilize Tehama CoC's [Emergency Shelter Form Kit](#).

Projects are expected to customize the forms in the following ways:

- a. All instructions shown in RED on Form Kit forms indicate customizations that must be made prior to form use.
- b. Specific project names and/or logos should be added wherever the text "[ES Project Name/Logo here]" is included on a form.

Additionally, projects may:

- a. Modify form layouts to be consistent with their organization's graphic standards or branding, and/or
- b. **Add** more detailed instructions to project staff as needed (i.e., which position is responsible for ensuring that a particular form or section is complete, project-specific file storage procedures, etc.)

Projects that opt not to utilize the [ES Form Kit](#), that choose to substitute one or more project-specific forms for Form Kit forms, or that make material changes to Form Kit forms for use in their project(s) are responsible for ensuring that their recordkeeping and documentation standards comply with [24 CFR 576.500](#) and all other applicable state and federal regulations. Proposed substitutions and/or modifications should be submitted for review by Tehama CoC's designated CA/AE prior to use to prevent issues that may arise from use of non-compliant practices and/or incomplete client files.

While the [ES Form Kit](#) is designed to guide staff through ES processes this guidance should not be considered a substitute in-person staff training. Tehama CoC's designated CA/AE is available to provide in-person staff training on compliant project operations, including Form Kit use. All projects funded by Tehama CoC through its designated CA/AE are required to complete this training at least once, and additional trainings should be requested by any project that experiences significant staff turnover. Tehama CoC's designated CA/AE may mandate refresher trainings for projects when significant issues have been identified as a result of an annual monitoring and/or ongoing compliance monitoring.

All forms listed throughout this Operations Manual are made available in Tehama CoC's [ES Form Kit](#).

H. Project Monitoring

All projects receiving funds directly from Tehama CoC through its designated CA/AE will undergo a full Monitoring, conducted by Tehama CoC's designated CA/AE at least annually and are subject to ongoing monitoring as part of the expenditure reimbursement and HMIS data quality processes. Projects receiving ESG funding directly from a state or federal agency are subject to monitoring by these funders.

The purpose of Monitoring is to identify deficiencies and/or non-compliant practices so that they can be remedied. Projects who receive monitoring findings will be given an opportunity to cure deficiencies and will be offered technical assistance as needed. More serious or repeat violations may result in more severe corrective actions up to and including the recapture of funds and may impact a project's or organization's eligibility for future funding.

III. Participant Eligibility

A. Overview

Participant eligibility requirements in this Operations Manual are derived from the ESG Program Interim Rule. Any changes to eligibility requirements based on updated HUD guidance or regulation, or based on federal statute, shall supersede this Operations Manual.

B. Eligibility Requirements

Participants must meet the criteria in this section to be eligible for assistance under any project covered by this Manual. Participants must meet either or both of the (1) or (2) below:

1. They are an individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - a. Has a primary nighttime residence that is a public or private place not meant for human habitation.
 - b. Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels/motels paid for by charitable organizations or by federal, state, and local government programs); or
 - c. Is exiting an institution where they have resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.
2. They are an individual or family who:
 - a. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, and/or human trafficking; and
 - b. Has no other residence; and
 - i. Lacks resources or support networks to obtain other permanent housing; and
 - ii. Lacks a fixed, regular, and adequate nighttime residence as described above in section III.B.1 of this Manual.

C. Documenting Participant Eligibility

Projects are required to include documentation of each participant's eligibility for ES services in the client file. Participant eligibility can be documented by completing the **Eligibility Determination** section of the Emergency Shelter (ES) Services and Client File Checklist (**Form 1A**), including completing and attaching ES Homelessness Status Worksheet (**Form 1B**), as well as one or more of Forms 1C-1E, as required and described in Form 1B, available in Tehama CoC's [ES Form Kit](#).

IV. Activity Eligibility

A. Overview

Eligible activities for ES projects are defined by the [ESG Program Interim Rule](#). Additional eligible activities specifically designed to prevent, prepare for, and respond to COVID-19 are defined in ESG-CV [Notice CPD-21-08](#) and other Notices related to the COVID-19 pandemic as applicable.

B. Eligible Activities

ES may be used for costs of providing essential services to homeless families and individuals in emergency shelters, renovating buildings to be used as emergency shelter for homeless families and individuals, and operating emergency shelters.

All activities not listed in this Policy either explicitly or by reference are ineligible.

Specific eligible activities:

1. Essential Services

ESG-ES may be used to provide essential services to eligible participants as follows:

Eligible Activity	Description
Case Management	<p>The cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the participant. Component services and activities consist of:</p> <ol style="list-style-type: none">i. Using the Coordinated Entry systemii. Conducting the initial evaluation required under 24 CFR 576.401 (a), including verifying and documenting eligibilityiii. Counselingiv. Developing, securing, and coordinating services and obtaining Federal, State, and local benefitsv. Monitoring and evaluating participant progressvi. Providing information and referrals to other providersvii. Providing ongoing risk assessment and safety planning with victims of domestic violence <i>(note: this activity is available to all ES providers; it is not limited to victim service providers)</i>viii. Developing an individualized housing and service plan, including planning a path to permanent housing stability

<p>Child care</p>	<p>The costs of child care for participants, including providing meals and snacks, and comprehensive and coordinated sets of appropriate developmental activities. Children must be under the age of 13 unless they are living with a disability, in which case they must be under the age of 18. Child care centers must be licensed by the jurisdictions in which they operate in order for its costs to be eligible.</p>
<p>Education services</p>	<p>When necessary for the participant to obtain and maintain housing: the costs of improving knowledge and basic educational skills.</p> <p>Services include:</p> <ol style="list-style-type: none"> 1. Instruction or training in consumer education 2. Health education 3. Substance abuse prevention 4. Literacy 5. English as a Second Language <p>General Education Development (GED) ii. Component services or activities are:</p> <ol style="list-style-type: none"> 1. Screening, assessment, and testing 2. Individual or group instruction 3. Tutoring 4. Provision of books, supplies, and instructional material 5. Counseling 6. Referral to community resources
<p>Employment assistance and job training</p>	<p>Employment assistance and job training programs, including the cost of providing reasonable stipends to participants in employment assistance and job training programs.</p> <ol style="list-style-type: none"> 1. Formats include: <ol style="list-style-type: none"> a. Classroom b. Online c. Computer instruction d. On-the-job instruction e. Services that assist people in securing employment, acquiring learning skills, and/or increasing earning potential ii. "Learning skills" include those skills that can be used to secure

	<p>and retain a job, including the acquisition of vocational licenses and/or certificates.</p> <ol style="list-style-type: none"> 2. "Services that assist individuals in securing employment" consist of: <ol style="list-style-type: none"> a. Employment screening, assessment, or testing b. Structured job skills and job-seeking skills c. Special training and tutoring, including literacy training and prevocational training d. Books and instructional material e. Counseling or job coaching f. Referral to community resources
<p>Outpatient health services</p>	<p>Direct outpatient treatment of medical conditions provided by licensed medical professionals. ESG funds may only be used for these services to the extent that other appropriate health services are available within the community. Eligible treatment consists of:</p> <ol style="list-style-type: none"> 1. Assessing a participant's health problems and developing a treatment plan 2. Assisting participants to understand their health needs 3. Providing directly or assisting participants to obtain appropriate medical treatment, preventive medical care, and health maintenance services, including emergency medical services 4. Providing medication and follow-up services 5. Providing preventive and noncosmetic dental care
<p>Legal services</p>	<p>The hourly fees for legal advice and representation by attorneys licensed and in good standing with the bar association of the State in which the services are provided and by people under the supervision of the licensed attorney regarding matters that interfere with the participant's capacity to obtain and retain housing. ESG may only be used for these services to the extent that other appropriate legal services are unavailable or inaccessible within the community. Fees based on actual service performed (i.e. fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees or other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the subrecipient's</p>

	<p>employees' salaries and other costs necessary to perform the services.</p> <ol style="list-style-type: none"> 1. Eligible subject matters are: <ol style="list-style-type: none"> a. Child support b. Guardianship c. Paternity d. Emancipation e. Orders of protection or other civil remedies for victims of domestic violence f. Appeal of veterans and public benefit claim denials g. Resolution of outstanding criminal warrants ii. Component services or activities may include: <ol style="list-style-type: none"> h. Client intake i. Preparation of cases for trial j. Provision of legal advice k. Representation at hearings l. Counseling 1. Explicitly ineligible activities are: <ol style="list-style-type: none"> a. Legal services for immigration and citizenship matters b. Issues relating to mortgages c. Retainer fee arrangements d. Contingency fee arrangements
<p>Life skills training.</p>	<p>Teaching critical life management skills that may never have been learned or that have been lost during the course of physical or mental illness, domestic violence, substance use, and homelessness. Services must be necessary to assist the participant to function independently in the community. Component life skills trainings are:</p> <ol style="list-style-type: none"> 1. Budgeting resources 2. Managing money 3. Managing a household 4. Resolving conflict 5. Shopping for food and needed items 6. Improving nutrition

	<ol style="list-style-type: none"> 7. Using public transportation 8. Parenting
Mental health services	<p>Direct outpatient treatment by licensed professionals of mental health conditions. ESG funds may only be used for these services to the extent that other appropriate mental health services are unavailable or inaccessible within the community. Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual family functioning or circumstances. Problem areas may include family and marital relationships, parent-child problems, or symptom management. Eligible treatment consists of:</p> <ol style="list-style-type: none"> 1. Crisis interventions <ol style="list-style-type: none"> a. Individual, family, or group therapy sessions b. Prescription of psychotropic medications or explanations about the use and management of medications c. Combinations of therapeutic approaches to address multiple problems
Substance abuse treatment services	<p>Services designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors that are provided by licensed or certified professionals. ESG funds may only be used for these services to the extent that other appropriate substance abuse treatment services are unavailable or inaccessible within the community.</p> <ol style="list-style-type: none"> 1. Eligible treatment consists of: <ol style="list-style-type: none"> a. Client intake and assessment b. Outpatient treatment for up to 30 days c. Group and individual counseling and drug testing 2. Explicitly ineligible activities are: <ol style="list-style-type: none"> a. Inpatient detoxification b. Other inpatient drug or alcohol treatment
Transportation	<p>Costs of a participant's travel to and from medical care, employment, child care, or other eligible essential services facilities.</p> <p>These costs include the following:</p>

	<ol style="list-style-type: none"> 1. The cost of a participant's travel on public transportation 2. If service workers use their own vehicles: mileage allowance for service workers to visit participants 3. The cost of purchasing or leasing a vehicle for the recipient or subrecipient in which staff transports participants and/or staff serving participants and the cost of gas, insurance, taxes, and maintenance for the vehicle 4. The travel costs of recipient or subrecipient staff to accompany or assist participants to use public transportation.
<p>Services for special populations</p>	<p>As listed in 24 CFR 576.102(1)(xi)</p>

2. Renovation

Under certain circumstances, ESG-ES may be used to pay for labor, materials, tools, and other costs for renovation, including major rehabilitation of an emergency shelter or conversion of a building into an emergency shelter. The emergency shelter must be owned by a government entity or private nonprofit organization.

Renovation costs are only eligible where such costs are explicitly described in a project's contract/agreement with the relevant funding agency. Even when explicitly described as eligible costs in a project's funding contract/agreement, projects seeking to use funds for Renovation costs must consult with the funding agency and complete all relevant environmental review requirements prior to incurring any such costs. Additionally, projects should be advised that ESG funds, as well as most funding available through Tehama CoC, are considered Public Funds and are subject to laws and regulations pertaining to Prevailing Wage and other laws and regulations, as applicable.

3. Shelter Operations

ESG-ES may be used to pay for maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter.

Where no appropriate emergency shelter is available for a given household, eligible costs may also include a hotel or motel voucher for that household.

4. Assistance Required Under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA)

ESG-ES may be used to pay for providing URA assistance as specified under 24 CFR 576.408, including relocation payments and other assistance to people displaced by a project assisted with ESG funds. People that receive URA assistance are not

considered “program participants” for the purposes of the ESG Program interim rule and relocation payments and other URA assistance are not considered “rental assistance” or “housing relocation and stabilization services” for the purposes of the ESG Program interim rule.

C. Minimum Periods of Use

1. Essential Services and Shelter Operations

Where the recipient or subrecipient uses ESG funds solely for essential services or shelter operations, the recipient or subrecipient must provide services or shelter to people experiencing homelessness at least for the period during which the grant funds are provided. The recipient or subrecipient does not need to limit these services or shelter to a particular site or structure so long as the site or structure serves the same population(s) originally served with the assistance (e.g. families with children, unaccompanied youth, people living with disabilities, victims of domestic violence) or serves people experiencing homelessness in the same geographic area where the recipient or subrecipient originally provided services or shelter.

2. Renovated Buildings

Each building renovated with ESG funds must be maintained as a shelter for people experiencing homelessness for not less than a period of 3 or 10 years depending on the type of renovation and the value of the building. The “value of the building” is the reasonable monetary value assigned to the building, such as the value assigned by an independent real estate appraiser. The minimum use period must begin on the date the building is first occupied by a person experiencing homelessness after the completed renovation. A minimum period of use of 10 years, required of major rehabilitation or conversion, must be enforced by a recorded deed or use restriction.

- a. **Major rehabilitation.** If the rehabilitation cost of an emergency shelter exceeds 75% of the value of the building before rehabilitation, the minimum period of use is 10 years.
- b. **Conversion.** If the cost to convert a building into an emergency shelter exceeds 75% of the value of the building after conversion, the minimum period of use is 10 years.
- c. **Renovation Other Than Major Rehabilitation or Conversion.** In all other cases, the minimum period of use is 3 years.

D. Additional Eligible Activities Under Notice CPD-21-08

Activities eligible under ESG-CV [Notice CPD-21-08](#), or any superseding notices, can be found on the [HUD Exchange website](#). Subrecipients should refer to this website for the latest information.

These activities are eligible for ESG-ES projects funded with annual ESG from Federal Fiscal Year 2020 or prior, when such funding is specifically used to prevent, prepare for, and respond to COVID-19. These activities are also eligible for ESG-ES projects funded with ESG-CV. CA HCD may, at its discretion, limit eligible activities via the subrecipient contract.

Note that eligibility of these activities will expire for annual ESG funding on September 30, 2022 and for ESG-CV funding on September 30, 2023 unless otherwise specified by HUD and/or CA HCD.

E. “Prevent, Prepare, and Respond” Tieback

Under this Manual, when ESG funds are used to prevent, prepare for, and respond to COVID19 (PPR), there are certain requirements related to documenting those activities' relationships to PPR at the activity level (but not the participant level) and in the Integrated Disbursement and Information System (IDIS). More information about those requirements, including sample text for IDIS, for many common activities, can be found in HUD's [“Homeless System Response: ESG-CV ‘Prevent, Prepare, and Respond’ Tieback Flexibilities Quick Guide.”](#)

F. Maintenance of Effort

The effort of maintenance requirements under 24 CFR 576.101(c), which apply to the use of ESG funds for essential services related to street outreach, also apply for the use of such funds for essential services related to emergency shelter.