



# ESG Client File Checklist

The Client File Checklist is intended to support ESG subrecipients in obtaining compliant client-level documentation for the Emergency Shelter (ES) component. Obtaining and maintaining full and complete documentation for each applicant is required for every entity that receives ESG funds. This checklist guides staff to ensure that each client file contains the required information for both California Department of Housing and Community Development (CA HCD) and the United States Department of Housing and Urban Development (HUD).

**Instructions:**

- Every client served by ESG must have a client file that contains all the relevant information below and includes this Client File Checklist.
- The Client File Checklist itself intended to serve as a means for documenting that ES is being provided consistent with the [CA HCD Emergency Shelter Policy](#).
- Update the fields below to show which documents are in the client file.
- Gather documents, complete calculations, and add documents and completed forms in the order of each section.

Case Information			
<b>Agency &amp; Program Name:</b>			
<b>Head of Household Client ID:</b>	<b>Application Date:</b>		
	<b>Program &amp; HMIS Entry Date:</b>		
<b>Client Status:</b>	<input type="checkbox"/> New to program <input type="checkbox"/> Continuing client <input type="checkbox"/> Ineligible client (see Eligibility Section)	<b>ESG Program:</b>	<input type="checkbox"/> Emergency Shelter
Household Information			
<b>Required Documentation</b>			<b>In File</b>
<input type="checkbox"/> HMIS ESG Intake Form ( <b>inclusive of all ESG-required HMIS data elements</b> ) <i>*Household information is entered in HMIS and should be printed and included in the case file</i>			
<input type="checkbox"/> HMIS Release of Information or equivalent form			
Further Information: <a href="#">ESG Program HMIS Manual</a>			
Documentation of screening or Intake Form for Coordinated Entry			
			<b>Date</b>



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Eligibility		
<b>Required Documentation</b>	<b>In File</b>	<b>Date</b>
<p><b>VERIFICATION OF HOMELESS STATUS</b></p> <p><b>For literally homeless (“Category 1”) clients</b>, a completed homeless verification should come from HMIS when a client enters the project. Staff should review for eligibility and compliance.</p> <p>Preferred Order for Literally Homeless Documentation (Category 1):</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Third Party Certification Written (including already available documents such as HMIS record) or Oral (case manager to write out oral statement, sign, and date), OR</li> <li><input type="checkbox"/> Staff Observations (must be written, signed, and dated by relevant staff), OR</li> <li><input type="checkbox"/> Self-Certification (must be written and dated)</li> </ul> <p>While third party certification is the preferred method of verification for ESG, lack of third-party certification <b>MUST NOT</b> be a barrier to emergency shelter services. Self-certification is acceptable and often the most feasible for emergency shelter projects.</p> <p><b>For clients fleeing domestic violence (“Category 4”)</b>, preferred documentation order differs to consider safety and emergency needs:</p> <p>Victim Service Provider Intake:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Oral statement which confirms they are fleeing, have no subsequent residence, and they lack resources. Documented by self-certification or intake worker certification.</li> </ul> <p>Non-Victim Service Provider Intake:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Oral statement which confirms they are fleeing. Documented by self-certification or intake worker (seek third-party verification only so long as doing so does not jeopardize the client’s safety); AND</li> <li><input type="checkbox"/> Certification that no subsequent residence has been identified; AND</li> <li><input type="checkbox"/> Self-Certification, or other written documentation, that household lacks financial resources and support networks to obtain other permanent housing.</li> </ul>		



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<p>Sample HUD Certification Form: <a href="#">HUD-5382 Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and Alternate Documentation</a></p> <p>Further Information: <a href="#">CA HCD Homelessness Eligibility and Documentation Policy</a>; <a href="#">At a Glance: Criteria and Recordkeeping Requirements for Definition of Homeless</a>; <a href="#">24 CFR §576.2 (under Homeless definition)</a>; <a href="#">CPD Notice 2021-08</a>, Sec. I.B.1(b) (clarifying that the 24 CFR 576.2 Homeless definition applies, except the time limitation is lengthened in paragraph 1(iii) for people previously homeless exiting an institution. They are literally homeless if they resided in the institution for 120 days or less.)</p>		
<p><b>Ineligibility</b> (as applicable)</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Determination</li> <li><input type="checkbox"/> Documentation of Reason</li> </ul> <p>Further Information: <a href="#">24 CFR 576.500(d)</a>: For each individual and family determined ineligible to receive ESG assistance, the record must include documentation of the reason for that determination.</p>		
<p><b>Need</b> (Intended compliance with <a href="#">24 CFR Sections 576.401(a) and (b)</a>)</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Determination</li> <li><input type="checkbox"/> Supporting Documentation</li> </ul> <p>Further Information: CA HCD's ESG Subrecipient Program Manual, Sec. VII.B (Evaluation of Program Participant Eligibility &amp; Needs) outlines requirements for initial evaluation of the amount and types of assistance the participant needs to regain stability in permanent housing, and the periodic re-evaluations required for Rapid Re-Housing (at least annually).</p>		
<p><b>Emergency Shelter Activities</b></p> <p>ESG clients cannot be required to receive treatment, or perform any other prerequisite activities as a condition of staying in any shelter or receiving services</p>		
<p><b>Shelter</b></p>	<p><b>In File</b></p>	<p><b>Date</b></p>
<p><b>Lead Based Paint Inspection</b></p> <p>Adopt and implement policy that child-occupied spaces will be lead safe.</p> <ul style="list-style-type: none"> <li>• Required: Non-congregate Shelter has units with 1 or more bedrooms, receives assistance for &gt; 100 days</li> <li>• Exempt but Recommended: Shelter has 0 bedroom units or receives assistance for &gt; 100 days</li> <li><input type="checkbox"/> Pamphlet: "<a href="#">Protect Your Family From Lead in Your Home</a>"</li> <li><input type="checkbox"/> <a href="#">Lead-based paint visual assessment</a> certification form</li> <li><input type="checkbox"/> Landlord/tenant lead-based paint required to be given to all clients for dwelling units constructed prior to 1978 (<a href="#">HUD LBP Acknowledgement Form</a>)</li> </ul>		



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<p>The process and form must be completed whether a household is remaining in an existing unit or moving to a new unit. Program staff should use formal public records, such as tax assessment records, to establish the age of a unit. Print out a copy of the age of the unit for the case file. Visual assessment is required for pre-1978 housing where children under age 6 or pregnant women reside, unless the housing meets one of five exemptions listed on the worksheet. The visual assessment must be completed prior to ESG assistance being provided.</p> <p>Further Information: <a href="#">HUD Lead Based Paint Trainings</a>, CA HCD <a href="#">ESG California Lead Base Paint Assessment - Worksheet</a>; <a href="#">Interpretive Guidance on HUD's Lead Safe Housing Rule: The HUD Regulation on Controlling Lead Based Paint Hazards in Housing Receiving Federal Assistance ....(24 CFR Part 35), Subpart K, question K1, p. 36</a> (explaining applicable requirements for emergency shelter)</p>		
<h2>Emergency Shelter Activities</h2>		
<p><b>Services &amp; Linkages Provided</b></p>		
<p> <input type="checkbox"/> Diversion and Rapid Exit  <input type="checkbox"/> Essential services  <input type="checkbox"/> Housing-focused services (e.g., Housing Search and Placement, Search Counseling)  <input type="checkbox"/> Housing stability plan / Case management notes  <input type="checkbox"/> Other relevant services  <input type="checkbox"/> Service documentation         </p> <p>Documentation should include:</p> <ul style="list-style-type: none"> <li>• Services provided to participants (must be recorded in HMIS), including loaning cell phones with wireless plans to participants, providing participants with personal protective equipment, paying rental application fees, and paying for hotel/motel vouchers (only when no appropriate emergency shelter is available)</li> <li>• Length of services provided to participants</li> <li>• Service location (in emergency shelter)</li> <li>• Proof showing participant linkage to other support and resources</li> </ul> <p>ESG clients cannot be required to participate in services to receive assistance.</p> <p>Further Information: <a href="#">24 CFR §576.401(e)(1)(ii)</a> (describes required Housing Stability Plan components); <a href="#">CA HCD Housing Problem-Solving Policy</a> (provides more detail on diversion and rapid exit services); HCD ESG Subrecipient Program Manual, Sec. VII.B (Evaluation of Program Participant Eligibility &amp; Needs), sub-parts (4) and (5)</p>		



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<b>Payments</b>		
<input type="checkbox"/> Amounts		
<input type="checkbox"/> Proof of payments made on behalf of participant, identifying payee		
<input type="checkbox"/> Payment description detail		
<input type="checkbox"/> Other supporting documentation as relevant		

<b>Termination of Assistance</b>		
<input type="checkbox"/> Notification of Termination of ESG Services		
<input type="checkbox"/> Termination of Assistance Appeal		
<input type="checkbox"/> Other Supporting Documentation of Compliance with Termination and Appeals Policies and Procedures		
<p>HCD ESG Subrecipients Manual: compliance with the termination of assistance requirement in § 576.402. Documentation of compliance should include written policies and procedures. Other documentation may include written participant rights handout, written termination notices and final decisions, and other evidence</p> <p>Further Information: <a href="#">CA HCD Emergency Shelter Policy Manual</a>, Sec. II(E)</p>		

Project Staff completing the form: \_\_\_\_\_ Date: \_\_\_\_\_

Supervisor/Manager Review: \_\_\_\_\_ Date: \_\_\_\_\_