



# ESG Client File Checklist

The Client File Checklist is intended to support ESGV subrecipients in obtaining compliant client-level documentation for the Homelessness Prevention (HP) 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 HP is being provided consistent with the [CA HCD Homelessness Prevention 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"/> Homelessness Prevention	
Household Information				
<b>Required Documentation</b>			<b>In File</b>	<b>Date</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				



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Eligibility		
<i>Required Documentation for <u>all</u> ESG participants regardless of assistance provided.</i>	In File	Date
<p><b>VERIFICATION OF HOMELESS / AT RISK OF BEING HOMELESS STATUS FOR <u>HOMELESSNESS PREVENTION</u></b></p> <p>Eligible <b>Homelessness Prevention</b> participants include clients with imminent risk of homelessness (“Category 2”) OR Fleeing Domestic Violence (“Category 4”) OR at risk of homelessness OR a special youth category described below. Participants may not exceed the applicable 30% AMI income limit (see Income and Rent Determination Section).</p> <p>Preferred Order for Documentation:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Third Party Certification Written (including already available documents such as a record from HMIS / comparable database for victim or legal services providers) 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>A completed At-Risk or Category 2 verification form should come from the Coordinated Entry System through HMIS when a client is referred to the project. Staff should review for eligibility and compliance.</p> <p>Required documentation – <b>At-Risk of Homelessness</b> Definition:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Income Verification (see Income and Rent Determination Section); AND</li> <li><input type="checkbox"/> Self-Certification (see Need, Duplication of Benefits, and Income and Rent Determination Section) AND evidence (if available) that client has insufficient financial resources and support networks to immediately prevent them from moving into an emergency shelter or described in <a href="#">“Category 1” (Literally Homeless)</a>; AND</li> <li><input type="checkbox"/> Documentation of <a href="#">one of the seven eligible conditions</a></li> </ul> <p>Required documentation – <b>Imminent Risk (“Category 2”)</b> Definition:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Income Verification (see Income and Rent Determination Section); AND</li> <li><input type="checkbox"/> Substantiation that the primary nighttime residence will be lost within 14 days of the date of application for homeless prevention assistance (E.g., court order resulting from an eviction action, see <a href="#">applicable criteria during eviction moratoria</a>, evidence/documented and verified oral statement that a household leaving a hotel/motel lacks the financial resources to stay); AND</li> <li><input type="checkbox"/> Certification (see Need Section) that no subsequent residence has been identified; AND</li> <li><input type="checkbox"/> Self-Certification (see Need, Duplication of Benefits, and the Income and Rent Determination Section) or other written documentation that the household lacks the resources and support networks to obtain permanent housing.</li> </ul>		



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<p>Required documentation – <b>Fleeing Domestic Violence (“Category 4”)</b> Definition:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Income Verification (see Income and Rent Determination Section); AND</li> </ul> <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 the resources/support networks necessary to obtain other housing. (See Need, Duplication of Benefits, and Income and Rent Determination Section). 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 (see Need, Duplication of Benefits) that no subsequent residence has been identified; AND</li> <li><input type="checkbox"/> Self-Certification, or other written documentation, (see Need, Duplication of Benefits, and Income and Rent Determination Section) that household lacks financial resources and support networks to obtain other permanent housing.</li> </ul> <p>Further Information: <a href="#">HCD ESG Homelessness Prevention Policy Manual</a>; <a href="#">At a Glance: Criteria and Recordkeeping Requirements for Definition of Homeless (“Category 2”)</a>, <a href="#">At a Glance: Criteria for Defining At Risk of Homelessness</a>; <a href="#">24 CFR §576.2</a> (homeless and at-risk definitions); <a href="#">HUD Homeless System Response: Eligibility During Eviction Moratoria</a>; <a href="#">HUD CPD Monitoring Handbook, Exhibit 36-4A</a></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></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>		



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<p><b>Duplication of Benefits Analysis</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> <a href="#">Duplication of Benefits Checklist</a></li> <li><input type="checkbox"/> <a href="#">Duplication of Benefits Worksheet</a></li> </ul> <p>Before a funding decision is made, document the following analysis using the checklist and worksheet above:</p> <ul style="list-style-type: none"> <li>- For each ESG-CV funded cost type (e.g., rental application fees, security deposits, last month’s rent, utility deposits, utility payments, moving costs, rental assistance) determine the total amount of financial assistance needed; AND</li> <li>- Determine the amount of funding that has or will be provided from all non-ESG-CV funding sources to pay for the cost(s); AND</li> <li>- Compare the amount of assistance (Step 2) to the total need (Step 1) to determine the maximum possible ESG-CV award; AND</li> <li>- Document steps 1-3 and ESG-CV award amount to verify that the amount of ESG-CV award is equal to or lower than the maximum level of award.</li> </ul> <p>Further information: <a href="#">CA HCD Duplication of Benefits Policies and Procedures Manual</a>, HUD Guidance: <a href="#">Duplication of Benefits Training</a>, <a href="#">Quick Guide</a>, <a href="#">Duplication of Benefits Webinar</a></p>		
<b>Housing Stability Plan and Services &amp; Linkages Provided</b>		
<ul style="list-style-type: none"> <li><input type="checkbox"/> Housing Stability Plan</li> <li><input type="checkbox"/> Related Case Management Documentation</li> <li><input type="checkbox"/> Prevention and Diversion Services Provided</li> <li><input type="checkbox"/> Other Relevant Service Documentation &amp; Amounts (except as already documented in this section’s Rental Assistance Agreement sub-section above; Payments sub-section below; and Financial Assistance in Section 6 below)</li> </ul> <p>Documentation should include:</p> <ul style="list-style-type: none"> <li>• Services and assistance provided to participants (must be recorded in HMIS), including furniture/household furnishings and personal protective equipment.</li> <li>• Length of housing stability case management/other services provided to participants.</li> <li>• Proof showing participant linkage to other support and resources.</li> </ul> <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> (to be integrated into housing stability case management, provides more details on prevention and</p>		



# ESG Client File Checklist

diversion services); HCD ESG Subrecipient Program Manual, Sec. VII.B (Evaluation of Program Participant Eligibility & Needs), sub-parts (4) and (5)		
<b>Income and Rent Determination</b> <b>Income determination required to determine initial eligibility and every 3 months following for Homelessness Prevention</b>		
<b>Required Documentation</b>	<b>In File</b>	<b>Date</b>
<p><b>Income Eligibility and Rent Determination</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Income evaluation form, AND</li> <li><input type="checkbox"/> Verification Documents:             <ul style="list-style-type: none"> <li><input type="checkbox"/> Source documents for assets and income received, OR</li> <li><input type="checkbox"/> WRITTEN third-party statement, OR</li> <li><input type="checkbox"/> WRITTEN certification by program intake staff of ORAL third-party verification, OR</li> <li><input type="checkbox"/> WRITTEN Self-Certification</li> </ul> </li> </ul> <p>For ESG-CV Homelessness Prevention income must be no more than 30% AMI            Examples of Written Third Party Documentation: pay stubs, tax returns, benefits notices, bank statements, other income statements.            Further information: HUD Resources: <a href="#">AMI Determination</a>, <a href="#">HUD Income Calculator</a> and <a href="#">User Manual</a></p>		
<b>Homelessness Prevention Activities</b>		
<b><i>If the participant moved into a unit, the following documentation is required.</i></b>	<b>In File</b>	<b>Date</b>
<p><b>Habitability Standards</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Housing <a href="#">Habitability Standards</a> inspection (see also <a href="#">HCD sample checklist</a>)</li> </ul> <p>This process and form must be completed whether a household is remaining in an existing unit or moving to a new unit.            Further Information: <a href="#">ESG minimum habitability standards and sample checklist</a>, <a href="#">CA HCD Minimum Habitability Standards for Shelter and Housing Policy</a></p>		
<p><b>Lead Based Paint</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Landlord/tenant lead-based paint disclosure required to be given to all clients for all units constructed prior to 1978 (<a href="#">HUD LBP Acknowledgement Form</a>)</li> <li><input type="checkbox"/> Pamphlet: “<a href="#">Protect Your Family From Lead in Your Home</a>” given to clients for all units constructed prior to 1978</li> <li><input type="checkbox"/> <a href="#">Lead-based paint visual assessment</a> certification form*</li> </ul> <p>The process and form must be completed whether a household is remaining in an existing unit or moving to a new unit.</p>		



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<p>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.</p> <p>*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></p>		
<b><i>If the participant received rental and/or financial assistance, the following is required.</i></b>		
<p><b>Residential Lease Agreement</b> between participant and landlord (or allowable and legal sublease agreement)</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Signed by participant and landlord (or relevant parties for sublease, but contact landlord for confirmation)</li> <li><input type="checkbox"/> Dated</li> <li><input type="checkbox"/> Addresses late payment requirements</li> </ul> <p>Types of rental assistance:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Tenant Based Rental Assistance: No minimum lease and rental assistance agreement requirement.</li> <li><input type="checkbox"/> Project Based Rental Assistance: Lease and rental assistance agreement must have an initial term of one year.</li> </ul> <p>HUD Resource: <a href="#">Requirements for Rental Assistance Agreements and Leases Under ESG (PDF)</a></p>		
<p><b>Payments</b> made on behalf of the participant.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Proof of rental assistance payments made to owners made on behalf of participant(s)</li> <li><input type="checkbox"/> Dates/term payments covered</li> <li><input type="checkbox"/> Dates of occupancy by program participants</li> <li><input type="checkbox"/> Other supporting documentation (leases, rental assistance agreements)</li> </ul> <p><a href="#">24 CFR §576.500(h)</a> requires documentation of payments made to owners for the provision of rental assistance and supporting documentation for these payments, including dates of occupancy by program participants</p>		
<b><i>If the participant received rental assistance, the following are required.</i></b>		
<p><b>Rental Assistance Agreement</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Signed and dated by landlord and agency</li> <li><input type="checkbox"/> Includes requirements outlined in 24 CFR 576.106(e)</li> <li><input type="checkbox"/> Consistency with lease: same payment due date, grace period, and late payment requirements.</li> <li><input type="checkbox"/> Amounts: agreement clarifies amount to be paid by program participant and amount to be paid by program.</li> </ul>		



# ESG Client File Checklist

<input type="checkbox"/> Executed <u>before</u> rental assistance payments made to owner. Further Information: <a href="#">Requirements for Rental Assistance Agreements and Leases Under ESG (PDF), 24 CFR §§576.106</a> and <a href="#">24 CFR §§576.500(h)</a>		
<b>Fair Market Rent and Rent Reasonableness Certification</b> <input type="checkbox"/> <a href="#">Fair Market Rent and Rent Reasonableness Certification Form</a>  File must document fair market rent and rent reasonableness, including dates of comparisons. Further Information: <a href="#">CA HCD Fair Market Rent and Rent Reasonableness Policy</a>		
<b>VAWA Documentation</b> <input type="checkbox"/> <a href="#">VAWA Lease Amendment</a> must be an addendum to the residential lease agreement <input type="checkbox"/> <a href="#">VAWA Notice of Occupancy Rights (HUD 5380)</a> <input type="checkbox"/> <a href="#">VAWA Victim Certification Form (HUD 5382)</a> <input type="checkbox"/> <a href="#">VAWA Emergency Transfer Request (HUD 5383)</a> (if applicable)  Further Information: HUD Resource: <a href="#">Requirements for Rental Assistance Agreements and Leases Under ESG (PDF)</a> , HCD Resource: <a href="#">VAWA Compliance Policy</a>		
<b>Financial Assistance</b>		
<input type="checkbox"/> Financial Assistance Tracking, including proof of payment and supporting documentation.  Ensure documentation in file shows the type(s) and amount(s) of financial assistance provided, to whom it was provided, and sufficient detail to describe the service costs the assistance covered, including: <ul style="list-style-type: none"> <li>• Moving and/or relocation costs</li> <li>• Exact language from lease/rental assistance agreement and related documentation, including (as applicable) info on rental housing application fees, security deposits, and last month's rent.</li> <li>• Utility account information, including name of account holder/proof of responsibility info, utility type(s), service dates, and arrears and current payment amounts.</li> </ul> <a href="#">24 CFR §576.105(a)</a> requires eligible Financial Assistance costs to be paid directly to a housing owner, utility company, or other third party (i.e., not directly to the program participant)		



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Re-evaluation		
<p>ESG review and re-evaluation to be completed no later than _____(date)</p> <p><input type="checkbox"/> Completed record review and re-evaluation _____(date)</p> <p>Include updates to:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Household Information</li> <li><input type="checkbox"/> Eligibility               <ul style="list-style-type: none"> <li><input type="checkbox"/> Annual income under 30% of AMI (see Income and Rent Determination section for documentation requirements)</li> <li><input type="checkbox"/> Participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance</li> </ul> </li> <li><input type="checkbox"/> Housing Stability Plan notes/updates</li> </ul> <p><b>Homelessness Prevention must be reviewed every 3 months for ESG after 3/31/2022.</b></p>		
Termination of Assistance		
<ul style="list-style-type: none"> <li><input type="checkbox"/> Written Notification of Termination of ESG Services</li> <li><input type="checkbox"/> Program participant’s appeal (if applicable)</li> <li><input type="checkbox"/> Prompt written notice of final decision to the program participant</li> <li><input type="checkbox"/> Other Supporting Documentation of Compliance with Termination and Appeals Policies and Procedures</li> </ul> <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, and other evidence. Further Information: <a href="#">CA HCD Homelessness Prevention Manual</a>, Sec. II(E).</p>		

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

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