



ESG-CV Client File Checklist

The Client File Checklist is intended to support ESG-CV subrecipients in obtaining compliant client-level documentation for the Rapid Re-Housing (RRH) component. Obtaining and maintaining full and complete documentation for each applicant is required for every entity that receives ESG-CV 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-CV 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 RRH is being provided consistent with the [CA HCD Rapid Re-Housing 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				
Agency & Program Name:				
Head of Household Client ID:		Application Date:		
		Program & HMIS Entry Date:		
Client Status:	<input type="checkbox"/> New to program <input type="checkbox"/> Continuing client <input type="checkbox"/> Ineligible client (see (see Eligibility Section)	ESG-CV Program:	<input type="checkbox"/> Rapid Re-Housing	
Household Information				
Required Documentation			In File	Date
<input type="checkbox"/> HMIS ESG-CV Intake Form (inclusive of all ESG-required HMIS data elements) <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: ESG Program HMIS Manual				
Documentation of screening or Intake Form for Coordinated Entry				



ESG-CV Client File Checklist

Eligibility		
<i>Required Documentation for <u>all</u> ESG-CV participants regardless of assistance provided.</i>	In File	Date
<p>Verification of homeless status for Rapid Re-housing</p> <p>For literally homeless (“Category 1”) clients entering the RRH project, a completed homeless verification 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>Preferred Order for Literally Homeless Documentation (Category 1):</p> <ul style="list-style-type: none"> <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 <input type="checkbox"/> Staff Observations (must be written, signed, and dated by relevant staff), OR <input type="checkbox"/> Self-Certification (must be written and dated). <p>Further Information: At a Glance: Criteria and Recordkeeping Requirements for Definition of Homeless, CA HCD Homelessness Eligibility and Documentation Policy, CA HCD Rapid Rehousing Manual, Sec. III(B); CPD Notice 2021-08, 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 still considered literally homeless if they resided in the institution for 120 days or less.)</p> <p>For clients fleeing domestic violence (“Category 4”) entering the RRH project, clients are only eligible under Category 4 if they are residing in a place described in Category 1 (Literally Homeless).</p> <p>Victim Service Provider Intake:</p> <ul style="list-style-type: none"> <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. <p>Non-Victim Service Provider Intake:</p> <ul style="list-style-type: none"> <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 <input type="checkbox"/> Certification that no subsequent residence has been identified; AND <input type="checkbox"/> Self-Certification, or other written documentation, that household lacks financial resources and support networks to obtain other permanent housing. <p>Further Information: Resources listed above and 24 CFR §576.2 (under Homeless definition, paragraph (4))</p>		



ESG-CV Client File Checklist

<p>Ineligibility</p> <ul style="list-style-type: none"> <input type="checkbox"/> Determination <input type="checkbox"/> Documentation of Reason <p>Further Information: 24 CFR 576.500(d): For each individual and family determined ineligible to receive ESG-CV assistance, the record must include documentation of the reason for that determination.</p>		
<p>Need (Intended compliance with 24 CFR Sections 576.401(a) and (b))</p> <ul style="list-style-type: none"> <input type="checkbox"/> Determination <input type="checkbox"/> Supporting Documentation <p>Further Information: CA HCD's ESG Subrecipient Program Manual, Sec. VII.B (Evaluation of Program Participant Eligibility & 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>Duplication of Benefits Analysis</p> <ul style="list-style-type: none"> <input type="checkbox"/> Duplication of Benefits Checklist <p>Before a funding decision is made, document the following analysis using the checklist and worksheet above:</p> <ul style="list-style-type: none"> - 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 - 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 - Compare the amount of assistance (Step 2) to the total need (Step 1) to determine the maximum possible ESG-CV award; AND - 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. <p>Further information: CA HCD Duplication of Benefits Policies and Procedures Manual, HUD Guidance: Duplication of Benefits Training, Quick Guide, Duplication of Benefits Webinar</p>		
Housing Stability Plan and Services & Linkages Provided		
<p>Required Documentation for <u>all</u> ESG-CV participants</p>	In File	Date
<ul style="list-style-type: none"> <input type="checkbox"/> Housing Stability Plan <input type="checkbox"/> Related Case Management Documentation <input type="checkbox"/> Rapid Exit Services Provided <input type="checkbox"/> Other Relevant Service Documentation & Amounts (except as already documented in this section's Rental Assistance Agreement sub-section above; Payments sub-section below; and Financial Assistance in Financial Assistance Section) 		



ESG-CV Client File Checklist

<p>Documentation should include:</p> <ul style="list-style-type: none"> • Services and assistance provided to participants (must be recorded in HMIS), including furniture/household furnishings and personal protective equipment. • Length of housing stability case management/other services provided to participants. • Proof showing participant linkage to other support and resources <p>ESG-CV clients cannot be required to participate in services to receive assistance. Monthly case management requirement is waived for ESG-CV.</p> <p>Further Information: 24 CFR §576.401(e)(1)(ii) (describes required Housing Stability Plan components); CA HCD Housing Problem-Solving Policy (to be integrated into housing stability case management, provides more details on rapid exit services); HCD ESG Subrecipient Program Manual, Sec. VII.B (Evaluation of Program Participant Eligibility & Needs), sub-parts (4) and (5)</p>		
<p>Income and Rent Determination</p> <p>Income determination required at least <u>annually</u> and upon notification of income/circumstances change affecting need for RRH</p>		
<p>Required Documentation</p>	<p>In File</p>	<p>Date</p>
<p>Income Eligibility and Rent Determination</p> <ul style="list-style-type: none"> <input type="checkbox"/> Income evaluation form, AND <input type="checkbox"/> Verification Documents: <ul style="list-style-type: none"> <input type="checkbox"/> Source documents for assets and income received, OR <input type="checkbox"/> WRITTEN third-party statement, OR <input type="checkbox"/> WRITTEN certification by program intake staff of ORAL third-party verification, OR <input type="checkbox"/> WRITTEN Self-Certification <p>For RRH <u>no income verification is needed for initial assistance under Rapid Re-Housing</u> – determination is for rent calculation and annual re-evaluation. Participant must have an annual income below 50% Area Median Income (AMI) limit to continue to receive RRH.</p> <p>Examples of Written Third Party Documentation: pay stubs, tax returns, benefits notices, bank statements, other income statements.</p> <p>Further information: HUD Resources: AMI Determination, HUD Income Calculator and User Manual</p>		



ESG-CV Client File Checklist

Rapid Re-Housing Activities		
<i>If the participant moved into a unit, the following documentation is required.</i>	In File	Date
<p>Habitability Standards</p> <ul style="list-style-type: none"> <input type="checkbox"/> Housing Habitability Standards inspection (see also HCD sample checklist); OR <input type="checkbox"/> Housing Quality Standards (HQS) Inspection <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: ESG minimum habitability standards and sample checklist, HQS Inspection Form and Inspection Checklist, CA HCD Minimum Habitability Standards for Shelter and Housing Policy</p>		
<p>Lead Based Paint</p> <ul style="list-style-type: none"> <input type="checkbox"/> Landlord/tenant lead-based paint disclosure required to be given to all clients for all units constructed prior to 1978 (HUD LBP Acknowledgement Form) <input type="checkbox"/> Pamphlet: “Protect Your Family From Lead in Your Home” given to clients for all units constructed prior to 1978 <input type="checkbox"/> Lead-based paint visual assessment certification form* <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: HUD Lead Based Paint Trainings, CA HCD ESG California Lead Base Paint Assessment - Worksheet</p>		
<p><i>If the participant received rental and/or financial assistance, the following is required.</i></p> <p>Residential Lease Agreement between participant and landlord (or allowable and legal sublease agreement)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Signed by participant and landlord (or relevant parties for sublease, but contact landlord for confirmation) <input type="checkbox"/> Dated <input type="checkbox"/> Addresses late payment requirements <p>Type of rental assistance:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Tenant Based Rental Assistance: No minimum lease and rental assistance agreement requirement. <input type="checkbox"/> Project Based Rental Assistance: Lease and rental assistance agreement must have an initial term of one year. 		



ESG-CV Client File Checklist

<p>HUD Resource: Requirements for Rental Assistance Agreements and Leases Under ESG (PDF)</p>		
<p>Payments made on behalf of the participant.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Proof of rental assistance payments made to owners made on behalf of participant(s) <input type="checkbox"/> Dates/term payments covered <input type="checkbox"/> Dates of occupancy by program participants <input type="checkbox"/> Other supporting documentation (leases, rental assistance agreements) <p>24 CFR §576.500(h) 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>		
<p><i>If the participant received rental assistance, the following are required.</i></p>		
<p>Rental Assistance Agreement</p> <ul style="list-style-type: none"> <input type="checkbox"/> Signed and dated by landlord and agency <input type="checkbox"/> Includes requirements outlined in 24 CFR 576.106(e) <input type="checkbox"/> Consistency with lease: same payment due date, grace period, and late payment requirements <input type="checkbox"/> Amounts: agreement clarifies amount to be paid by program participant and amount to be paid by program <input type="checkbox"/> Executed <u>before</u> rental assistance payments made to owner <p>Further Information: Requirements for Rental Assistance Agreements and Leases Under ESG (PDF), 24 CFR §§576.106 and 24 CFR §§576.500(h)</p>		
<p>Rent Reasonableness Certification</p> <ul style="list-style-type: none"> <input type="checkbox"/> Rent Reasonableness Certification Form <p>File must document rent reasonableness, including dates of comparisons.</p> <p>Further Information: CA HCD Fair Market Rent and Rent Reasonableness Policy</p>		
<p>VAWA Documentation</p> <ul style="list-style-type: none"> <input type="checkbox"/> VAWA Lease Amendment must be an addendum to the residential lease agreement <input type="checkbox"/> VAWA Notice of Occupancy Rights (HUD 5380) at required times outlined in 24 CFR 576.409(c) <input type="checkbox"/> VAWA Victim Certification Form (HUD 5382) (if applicable) <input type="checkbox"/> VAWA Emergency Transfer Request (HUD 5383) (if applicable) 		



ESG-CV Client File Checklist

<p>Further Information: HUD Resource: Requirements for Rental Assistance Agreements and Leases Under ESG (PDF), HCD Resource: VAWA Compliance Policy</p>		
<p>Landlord Incentive Agreement</p> <ul style="list-style-type: none"> <input type="checkbox"/> Landlord W-9 (may need for processing payments to landlord) <input type="checkbox"/> Complies with existing landlord incentive policy <input type="checkbox"/> Maximum: 3 months' rent <p>Further Information: COVID-19 Homeless System Response: Leveraging ESG-CV Landlord Financial Incentives to Expedite Engagement</p>		
Financial Assistance		
<ul style="list-style-type: none"> <input type="checkbox"/> Financial Assistance Tracking <p>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:</p> <ul style="list-style-type: none"> • Moving and/or relocation costs • 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. • Landlord Incentives • Utility account information, including name of account holder/proof of responsibility info, utility type(s), service dates, and arrears and current payment amounts. <p>24 CFR §576.105(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)</p>		



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Re-evaluation

ESG-CV review and re-evaluation to be completed no later than _____ (date)

Completed record review and re-evaluation _____ (date)

Included updates to the following:

- Household Information
- Eligibility
 - Annual income under 50% of AMI (see Income and Rent Determination section for documentation requirements)
 - Participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance
- Housing Stability Plan notes/updates

Rapid Re-Housing requires annual reviews and re-evaluations, as well as upon notification about participant's income or circumstances change that affects need for RRH

Further Information: [24 CFR §576.401\(b\)](#)



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Termination of Assistance		
<ul style="list-style-type: none"><input type="checkbox"/> Written Notification of Termination of ESG Services<input type="checkbox"/> Program participant's appeal (if applicable)<input type="checkbox"/> Prompt written notice of final decision to the program participant<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, and other evidence</p> <p>Further Information: CA HCD Rapid Re-Housing Manual, Sec. II(F)</p>		

Project Staff completing the form: _____ Date: _____

Supervisor/Manager Review: _____ Date: _____