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Sent: Wednesday, March 25, 2020 3:35 PM
To: Naomi Cantu <naomi.cantu@tdhca.state.tx.us>
Cc: Kali Adams <kali.adams@tdhca.state.tx.us>
Subject: ESG Subs - Reminders/Updates re: COVID-19

Good afternoon, ESG Subrecipients,

This email is to address some frequently asked questions we are getting at TDHCA regarding ESG policies, ESG eligible costs and COVID-19.

1. Question: Do Program Participants have to physically sign the intake form/Violence Against Women Act (HUD form 5382), and other required documentation?
 - a. Answer: Electronic signatures are allowed for Program Participant intake if you are using an official electronic signature program, such as Adobe fill and sign. However, if the form requires a notary, the signature has to be in person.
2. Question: Do we still have to perform habitability inspections?
 - a. Answer: We are working with HUD on alternatives to habitability inspections. Until we hear more from HUD, habitability inspections are still required. However, if your local health authority has stated that inspections are no longer allowed, you cannot perform those inspections until your health authority states that you can proceed. Note that the Texas Supreme Court has suspended eviction proceedings until April 19, 2020 (<https://gov.texas.gov/news/post/governor-abbott-issues-statement-on-texas-supreme-court-temporary-suspension-of-residential-eviction-proceedings>).
3. Question: Are hotel/motel vouchers for Program Participants allowed?
 - a. Answer: Hotel/motel vouchers are an eligible ESG cost through the emergency shelter component. Please keep in contact with your public health agency regarding isolation locations for persons who tested positive for COVID-19. The citation regarding hotel/motel vouchers cost eligibility is 24 CFR §576.102(a)(3): *"Shelter operations*. Eligible costs are the costs of 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 homeless family or individual, eligible costs may also include a hotel or motel voucher for that family or individual."
4. Question: How can we get more personal protective equipment, such as masks and gloves?
 - a. Answer: Personal protective equipment is an eligible ESG cost through the street outreach and emergency shelter component. If there is a shortage of personal protective equipment for purchase in your area, work with your local health authority to identify if there are additional resources the health authority can provide to help reach the vulnerable population you serve. The street outreach component citation related to personal protective equipment is 24 CFR §576.101(a)(1): *"Engagement*. The costs of activities to locate, identify, and build relationships with unsheltered homeless people and engage them for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs. These activities consist of making an initial assessment of needs and eligibility; providing crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; and actively connecting and providing information and referrals to programs targeted to homeless people and mainstream social services and housing programs, including emergency shelter, transitional housing,

community-based services, permanent supportive housing, and rapid re-housing programs. Eligible costs include the cell phone costs of outreach workers during the performance of these activities.” The emergency shelter citation related to personal protective equipment is 24 CFR §576.102(a)(3), listed under Answer 3.

5. Question: Is hazard/overtime pay allowable for staff?
 - a. Answer: If you have outlined policies for hazard and overtime pay in your employee handbook or budget, and these policies are communicated and applicable to all eligible employees, then these costs are allowable.

As a reminder, we have posted resources, including a HUD document on eligible ESG costs for infectious disease preparedness and a link to your local health entities, on our guidance page at <https://www.tdhca.state.tx.us/home-division/esgp/guidance-solutions.htm>. Please reach out to us if you have any questions or concerns regarding the COVID-19 situation.

Kind regards,

Naomi Cantu

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About TDHCA

The Texas Department of Housing and Community Affairs is committed to expanding fair housing choice and opportunities for Texans through the administration and funding of affordable housing and homeownership opportunities, weatherization, and community-based services with the help of for-profits, nonprofits, and local governments. For more information about fair housing, funding opportunities, or services in your area, please visit www.tdhca.state.tx.us or the [Learn about Fair Housing in Texas](#) page.