



— OFFICE *of* —  
**INSPECTOR GENERAL**  
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UNITED STATES DEPARTMENT OF  
HOUSING AND URBAN DEVELOPMENT

# Emergency Solutions Grants CARES Act Program

Office of Community Planning and Development,  
Washington, DC | 2022-LA-0002

August 17, 2022

Date: August 17, 2022

To: Marion McFadden  
Principal Deputy Assistant Secretary for Community Planning and Development, D

*//signed//*

From: Kilah S. White  
Assistant Inspector General for Audit, GA

Subject: Emergency Solutions Grants CARES Act Implementation Challenges

Attached are the U.S. Department of Housing and Urban Development (HUD), Office of Inspector General's (OIG) final results of our audit of HUD's Emergency Solutions Grants Coronavirus Aid, Relief, and Economic Security Act (CARES Act) program.

HUD Handbook 2000.06, REV-4, sets specific timeframes for management decisions on recommended corrective actions. For each recommendation without a management decision, please respond and provide status reports in accordance with the HUD Handbook. Please furnish us copies of any correspondence or directives issued because of the audit.

The Inspector General Act, Title 5 United States Code, appendix 8M, requires that OIG post its reports on the OIG website. Accordingly, this report will be posted at <https://www.hudoig.gov>.

If you have any questions or comments about this report, please do not hesitate to call Tanya Schulze, Audit Director, at (213) 534-2471.

## Highlights

### EMERGENCY SOLUTIONS GRANTS CARES ACT IMPLEMENTATION CHALLENGES | 2022-LA-0002

#### What We Audited and Why

We audited the U.S. Department of Housing and Urban Development's (HUD) Emergency Solutions Grants Coronavirus Aid, Relief, and Economic Security Act (CARES Act) (ESG-CV) program.

Our audit objective was to determine what challenges ESG-CV grant recipients faced in implementing the program and using grant funds. We used a survey questionnaire to gather feedback and insight directly from the 362 recipients of ESG-CV grants.

At the time we initiated this audit in July 2021, ESG-CV grant recipients had spent \$563,178,336 of available \$3.96 billion grant funds. We performed this audit to assist HUD's Office of Community Planning and Development in identifying opportunities to improve the timeliness and use of ESG-CV grant funds.

#### What We Found

Our survey questionnaire of the ESG-CV grant recipients found that they faced challenges in implementing the program and using grant funds. The grant recipients needed an extension beyond the spending deadline of September 30, 2022, to use a majority or all of their ESG-CV funds. HUD subsequently extended the spending deadline to help address this issue. The top challenges identified by the grant recipients included staff capacity and coordinating with other sources of pandemic related funding. In addition, a majority of the grant recipients that provided ESG-CV funds to subrecipients stated that the pandemic impacted their ability to effectively monitor their ESG-CV subrecipients. As a result, while HUD has taken action to help address the spending deadline concerns, the grantees' challenges with capacity, multiple funding sources, and monitoring their subgrantees may increase the risk of misuse of the funds. HUD can use the results of our survey questionnaire to potentially improve the continued implementation of the ESG-CV program and to inform its risk assessment of ESG-CV grantees.

#### What We Recommend

We recommend that the Principal Deputy Assistant Secretary for Community Planning and Development consider including grant recipients' challenges with capacity, multiple sources of funding, and subgrantee monitoring as part of CPD's risk assessments.

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## Background and Objective

Congress provided \$4 billion<sup>1</sup> in the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) for the Emergency Solutions Grants (ESG) program with two rounds of funding, referred to as “ESG-CV” grants, as follows:

1. Round 1. \$1 billion allocated under the annual ESG formula to grant recipients.
2. Round 2. \$2.96 billion allocated under a formula “for the benefit of unsheltered homeless, sheltered homeless, and those at risk of homelessness, to geographical areas with the greatest need based on factors to be determined by the [HUD] Secretary, such as risk of transmission of coronavirus, high numbers or rates of sheltered and unsheltered homeless, and economic and housing market conditions as determined by the Secretary.”

As of April 1, 2022, ESG-CV recipients had drawn nearly \$1.65 billion, or 42 percent, of the \$3.96 billion ESG-CV amount. Please refer to the table below.

ESG CARES funding	Total allocated <sup>2</sup> by HUD	Obligated <sup>3</sup> in IDIS <sup>4</sup>	Funded <sup>5</sup> activities	Drawn <sup>6</sup> amount
\$3,960,000,000	\$3,960,000,000	\$3,960,000,000	\$3,683,016,994	\$1,651,352,820

The CARES Act required that ESG-CV funds be used to prevent, prepare for, and respond to coronavirus among individuals and families who are homeless or receiving homeless assistance and to support additional homeless assistance and homelessness prevention activities to mitigate the impacts created by coronavirus. The CARES Act also authorized HUD to waive, or specify alternative requirements for, any provision of any statute or regulation that the Secretary administers in connection with the obligation by the Secretary or the use by the recipients of these amounts, except for requirements related to fair housing, nondiscrimination, labor standards, and the environment. The CARES Act also established that ESG-CV funds remain available until September 30, 2022. The ESG-CV funding represented a 1,379 percent increase to the regular 2020 annual ESG appropriation. To ensure that ESG-CV funds are spent quickly on eligible activities to address the public health and economic crises caused by coronavirus, HUD

<sup>1</sup> HUD committed \$40 million of the appropriated funds to technical assistance to recipients of ESG-CV to build capacity and facilitate speedy implementation.

<sup>2</sup> HUD awarded \$3.96 billion in funds to 362 grant recipients.

<sup>3</sup> HUD signed grant agreements and made funds available for disbursement.

<sup>4</sup> The Integrated Disbursement and Information System (IDIS) provides HUD with current information regarding the program activities underway across the Nation, including funding data. HUD uses this information to report to Congress and to monitor grant recipients.

<sup>5</sup> Grant recipients must fund a grant activity in IDIS before funds may be drawn.

<sup>6</sup> Grant recipients have drawn funds to pay for grant-specific activities.

published Office of Community Planning and Development (CPD) Notice CPD-20-08 and established progressive expenditure deadlines and recapture provisions as follows:

1. HUD may recapture up to 20 percent of a recipient's total award, including first and second allocation amounts, if the recipient has not spent at least 20 percent of that award by September 30, 2021.
2. HUD may recapture up to 80 percent of a recipient's total award, including first and second allocation amounts, if the recipient has not spent at least 80 percent of that award by March 31, 2022.
3. Before recapturing funds as described above, HUD will follow the enforcement process in 24 CFR (Code of Federal Regulations) 576.501 and provide the recipient with an opportunity to provide a spending plan demonstrating to HUD's satisfaction that all of the recipient's ESG-CV funds from the first and second allocations will be spent by September 30, 2022.

The ESG-CV funding provided through the CARES Act is expected to mitigate the health and economic impact of COVID-19 among some of the Nation's most vulnerable individuals and families. These funds will help communities implement infection control protocols to limit the spread of the virus among people experiencing homelessness, especially those in unsheltered and congregate shelter settings. The funds will also provide resources to housing programs that will most certainly see an increase in requests for assistance because of the economic downturn created by the pandemic response.

Eligible ESG recipients generally consist of States, metropolitan cities, urban counties, and territories, as defined in 24 CFR 576.2. ESG subrecipients may include units of general-purpose local government or private nonprofit organizations. Local governments (whether recipients or subrecipients) may also subgrant ESG funds to public housing agencies and local redevelopment authorities. HUD encourages eligible subrecipients to contact their local government for information about applying for ESG-CV funding.

Our audit objective was to determine what challenges ESG-CV grant recipients faced in implementing the program and using grant funds.

## Results of Audit

### FINDING: ESG-CV GRANT RECIPIENTS FACED CHALLENGES IN IMPLEMENTING THE PROGRAM AND USING GRANT FUNDS

ESG-CV grant recipients faced challenges in implementing the program and using grant funds. The survey questionnaire results<sup>7</sup> found that 39 percent of the grant recipients that responded may need an extension beyond the spending deadline of September 30, 2022, to use a majority or all of their ESG-CV funds.<sup>8</sup> The top two challenges experienced by the grant recipients as a result of the pandemic were staff capacity and coordinating with other sources of funds. Further, the majority of the grant recipients that provided ESG-CV funds to subrecipients stated that the pandemic impacted their ability to effectively monitor their ESG-CV subrecipients. We attribute that these conditions occurred because grant recipients were awarded large amounts of ESG-CV funding with the expectation it would be implemented and used quickly to address the needs of the homeless during an unprecedented pandemic. As a result, grantee recipients' challenges in (1) capacity, (2) multiple funding sources, and (3) monitoring their subgrantees may increase the risk of misuse of the funds.

### Grant Recipients' Ability to Meet the ESG-CV Spending Deadline

Most grant recipients<sup>9</sup> stated that they expect to use a majority or all of their ESG-CV funds by the spending deadline of September 30, 2022; however, 39 percent stated that an extension may be needed. Please refer to the table below for additional responses regarding the ability to spend by the spending deadline.

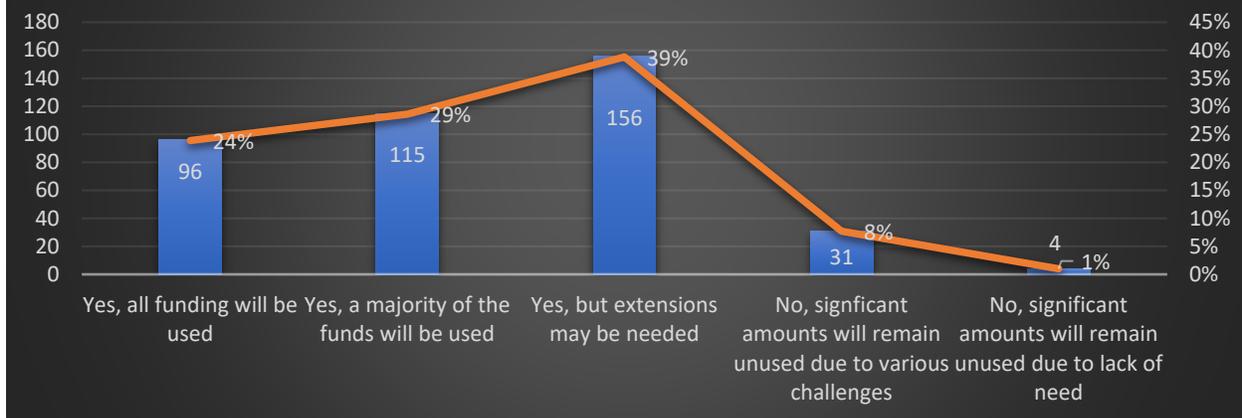
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<sup>7</sup> Eighty-six percent of the grant recipients responded to the survey questionnaire. Refer to Scope and Methodology section for survey questionnaire methodology and response rate information.

<sup>8</sup> Subsequent to our survey questionnaire, on April 18, 2022, HUD extended the spending deadline to September 30, 2023.

<sup>9</sup> Of the 362 ESG-CV grant recipients, 313 responded, and 49 did not. The survey questionnaire allowed the 313 respondents to check all that applied to them in regard to the spending deadline of September 30, 2022. As a result, there were 402 responses (See appendix B, question 16).

## Spending Deadline September 30, 2022



More than half of the respondents, 56 percent, found it challenging spending their agency’s allocated ESG-CV funds to prevent, prepare for, and respond to coronavirus compared to spending their regular annual ESG grant funds. (See appendix B, question 4.) In addition, 47 percent believed it was difficult to implement the ESG-CV program in comparison to the regular annual ESG program. (See appendix B, question 3.)

As of April 1, 2022, two years after the first tranche of grant funds were awarded, the grant recipients had drawn \$1.65 billion,<sup>10</sup> or 42 percent, of the \$3.96 billion in ESG-CV funds. Therefore, grant recipient concerns that they may not be able to fully spend the remaining \$2.31 billion by the September 30, 2022, spending deadline appear to be warranted.

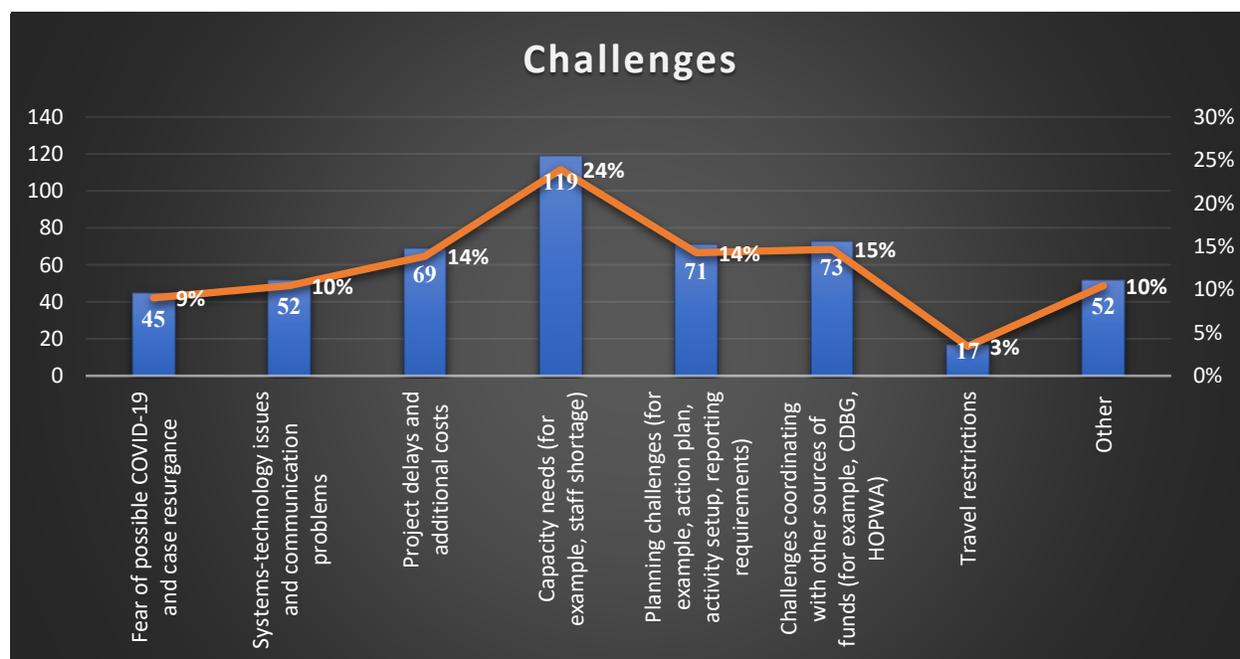
Subsequent to our questionnaire survey, on April 18, 2022, HUD issued Notice: CPD-22-06, Waivers and Alternative Requirements for the Emergency Solutions Grants Program Under the CARES Act (ESG-CV); Amendments and Clarifications. The Notice extended the overall deadline for expending ESG-CV funds. It stated that the recipients must expend all amounts through the first and second allocations of ESG-CV funds by September 30, 2023, except for administration and HMIS funds necessary for ESG-CV closeout, which must be expended by December 31, 2023. HUD determined that the new expenditure deadline was necessary because the pandemic lasted much longer than initially anticipated and “continues to cause significant risk to the public health and safety of the Nation.” HUD determined that ESG-CV activities will still be needed to prevent, prepare for, and respond to coronavirus after the original grant date of September 30, 2022. We believe the extension to the deadline will help alleviate the grant recipients concerns regarding spending<sup>11</sup> and ensure funds will continue to be made available to address pandemic related needs of the homeless.

<sup>10</sup> Specifically, \$1,651,352,820 drawn to pay for grant-specific activities, as of April 1, 2022.

<sup>11</sup> HUD extended the spending deadline after the survey questionnaire addressing the grantee recipients’ concerns; therefore, we have not included a recommendation on extensions.

## Top ESG-CV Challenges Identified by Grant Recipients

Nearly half of the grant recipients, 49 percent, experienced challenges as a result of the COVID-19 pandemic that prevented their agency from meeting the goals of the ESG-CV program; specifically, to prevent, prepare for, and respond to coronavirus to help individuals and families who are homeless. (See appendix B, question 5.) According to the survey questionnaire results, staff capacity and challenges coordinating with other sources of funds were among the top two challenges that prevented their agencies from meeting the ESG-CV objective.<sup>12</sup> (See appendix B, question 6.) Please refer to the Challenges table<sup>13</sup> below for the number of grant recipient responses to each of the challenges.



Forty two percent stated that they anticipated future challenges in administering the ESG-CV program. (See appendix B, question 10.) The grant recipients that anticipated future challenges specified that continued staff capacity was the highest anticipated challenge at 24 percent. (See appendix B, question 11).

Most grant recipients, 63 percent, stated they received other source(s) of non-HUD funding, such as Federal Emergency Management Agency, state, and local sources, to address homelessness. As detailed in the Impact of non-HUD funding table,<sup>14</sup> 64 percent,<sup>15</sup> of these grant recipients stated that the non-HUD funds have either moderately or significantly impacted their ESG-CV funds. (See appendix B,

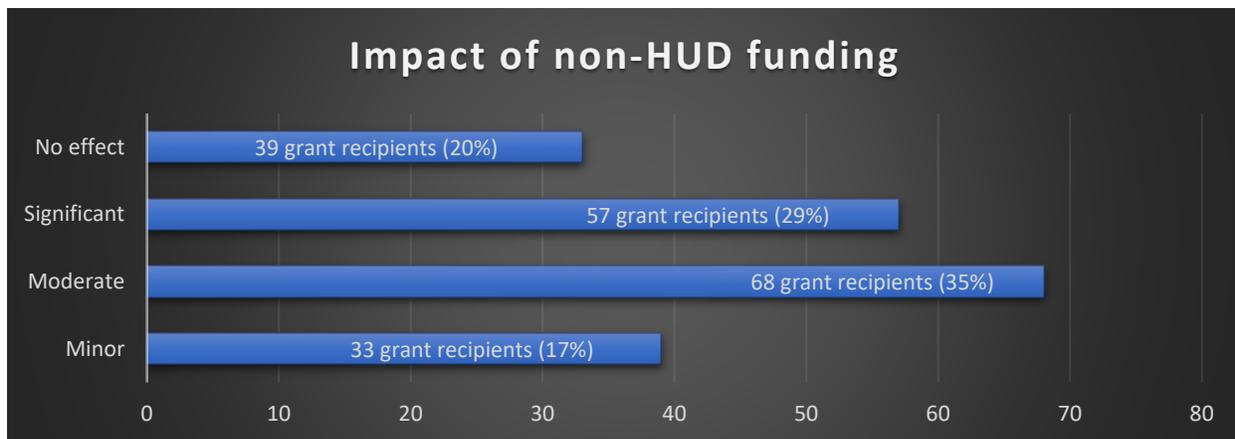
<sup>12</sup> We did not validate the grant recipients' concerns, as it was outside the scope of the audit. (See Scope and Methodology.)

<sup>13</sup> As noted in the table, CDBG is the Community Development Block Grant program and HOPWA is the Housing Opportunities for Persons with AIDS program. There was also a 1 percent difference in the table's combined total percentage due to rounding.

<sup>14</sup> There was a 1 percent difference in the table's combined total percentage due to rounding.

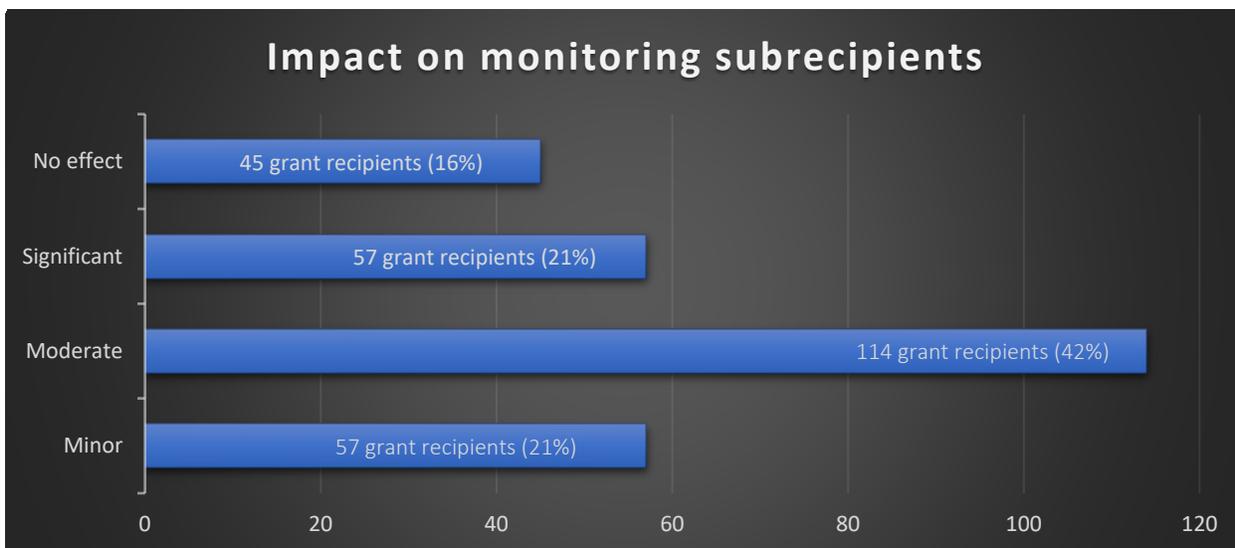
<sup>15</sup> We combined the 68 respondents, 35 percent, and 57 grant recipients, 29 percent, that stated moderate or significant impediment.

questions 12 and 13.) As noted in the chart above, the grant recipients as a whole identified coordinating with other sources of funds as the second highest challenges (15 percent). (See appendix B, question 11).



### Subrecipient Monitoring

The majority of grant recipients, 87 percent, stated they provided ESG-CV funds to subrecipients to administer. (See appendix B, questions 14 and 15.) As detailed in the chart below, 84 percent<sup>16</sup> of those grant recipients stated that the pandemic impacted their ability to effectively monitor subrecipients, and ultimately the program.<sup>17</sup>



<sup>16</sup> We combined the top three categories 1) 114 respondents, 42 percent, that stated moderate; 2) 57 grant recipients, 21 percent, that stated significant; and 3) 57 grant recipients, 21 percent that stated minor impact on monitoring subrecipients.

<sup>17</sup> We did not verify funds provided to subrecipients or the pandemic’s impact on monitoring as it was outside the scope of this audit. (See Scope and Methodology.)

HUD stated that it did not collect subrecipient contact information and subgrantee information would not necessarily be entered by the grant recipients into HUD's IDIS data system<sup>18</sup>. In addition, HUD relies on the grant recipients to monitor their own subrecipients; therefore, the risk to the program increases if the ESG-CV grant recipients ability to effectively monitor their subrecipients has been impacted by the pandemic.

## Conclusion

Many grant recipients have faced difficulty in spending a majority or all of their ESG-CV funds and needed an extension beyond the spending deadline of September 30, 2022. Subsequent to our survey questionnaire, HUD extended the spending deadline to September 30, 2023, which we believe will help alleviate the grant recipients concerns and allow the funding to remain available to address the pandemic related needs of the homeless. The top two challenges experienced by grant recipients due to the pandemic were staff capacity (24 percent) and coordinating with other sources of funds (15 percent). In addition, a majority of grant recipients that provided ESG-CV funds to subrecipients stated that the pandemic impacted their ability to effectively monitor their ESG-CV subrecipients. We attribute that these conditions occurred because grant recipients were awarded large amounts of ESG-CV funding with the expectation it would be implemented and used quickly to address the needs of the homeless during an unprecedented pandemic. As a result, the grant recipients' challenges with capacity, multiple funding sources, and monitoring may increase the risk of misuse of the funds.

## Recommendations

We recommend that the Principal Deputy Assistant Secretary for Community Planning and Development

- 1A. Consider grant recipients' feedback on challenges with (1) capacity, (2) multiple other sources of funding, and (3) subrecipient monitoring as part of CPD's risk assessments.

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<sup>18</sup> HUD's IDIS data system had information on ESG-CV subrecipient commitment and draw activity. However, there was no subrecipient contact or performance related information. We did not verify the accuracy or completeness of the subrecipient information as it was not within the audit's scope and objective.

## Scope and Methodology

We conducted the audit remotely from July 23 through October 18, 2021. Our audit covered the period March 27, 2020, to July 31, 2021. To accomplish our audit, we developed a questionnaire and sent it to all participating ESG-CV grant recipients.

The audit universe consisted of 362 grant recipients that received a combined total of \$3.96 billion for the first and second allocation of ESG-CV funds. We used Microsoft Forms to create the questionnaire for ESG-CV grant recipients to complete. HUD headquarters provided the contact information<sup>19</sup> generated from Sage<sup>20</sup>. We sent an email with a hyperlink for the ESG-CV recipients to access to our questionnaire online. During the 3-week response period,<sup>21</sup> we received 313 responses from the 362 ESG-CV grant recipients contacted, or an 86 percent (313 divided by 362) response rate. We included the survey questionnaire results<sup>22</sup> in appendix B for additional reference.

ESG-CV designated points of contact answered questions in the two categories: (1) the ESG-CV program focusing on general questions related to the implementation of the program and (2) ESG-CV program challenges and experiences. These questions were closed ended, and the questionnaire generally used a descriptive rating scale for tracking and evaluation purposes and optional comment boxes. We determined that a 100 percent selection method was appropriate since the online survey questionnaire is an effective and efficient method of data collection. Specifically, we relied on the information obtained through Microsoft Forms to collect responses from the designated points of contact. As a result, we determined that the information from the program was sufficient to meet the objective of our audit.

We conducted the audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our objective(s). We believe that the evidence obtained provides a reasonable basis for our conclusions based on our objective.

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<sup>19</sup> In instances such as when emails were undeliverable, we obtained alternate email addresses from field office directors and CPD staff emails or the IDIS PR 32 Grantee Contact Information Report.

<sup>20</sup> The Sage Homeless Management Information System (HMIS) Reporting Repository is a web-based reporting portal that allows ESG homeless assistance grant recipients to submit their ESG-Consolidated Annual Performance and Evaluation Report and ESG-CV Quarterly reports to HUD.

<sup>21</sup> We extended the survey questionnaire deadline an additional week, to October 5, 2021, to help meet the minimum 80 percent submission rate for the survey questionnaire.

<sup>22</sup> In addition to the results documented in appendix B, respondents had the opportunity to submit optional written comments as part of the survey questionnaire. Examples of the comments have been included in the applicable sections of the finding.

# Appendixes

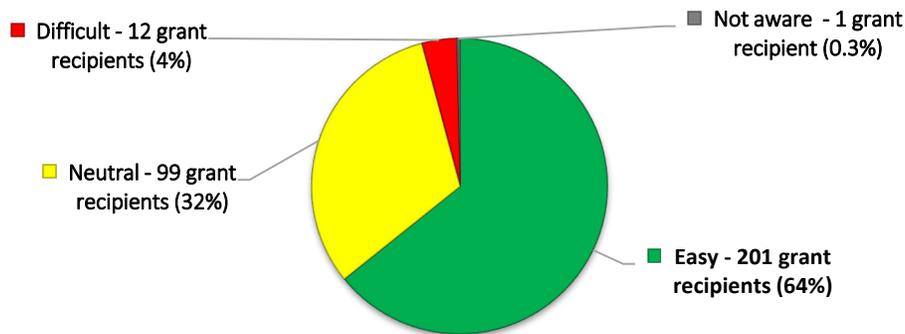
## APPENDIX A - AUDITEE COMMENTS AND OIG'S EVALUATION

CPD chose not to provide comments for inclusion in the final report.

## APPENDIX B - SURVEY QUESTIONNAIRE RESULTS

Questions and selection choices	Total	Percentage
<b>1. How would you rate how easy it was for your agency to find or be made aware when HUD issued its ESG-CV program notices guidance and waivers? For example: A notice was published on April 14, 2021: Notice CPD-21-05: Waiver and Alternative Requirements for the Emergency Solutions Grants (ESG) Program Under the CARES Act.</b>		
Easy	201	64%
Neutral	99	32%
Difficult	12	4%
Not aware of the program notices and waivers	1	0% <sup>23</sup>
<b>Total</b>	<b>313</b>	<b>100%</b>

### Ease of locating HUD-issued ESG-CV program notices, guidance, and waivers

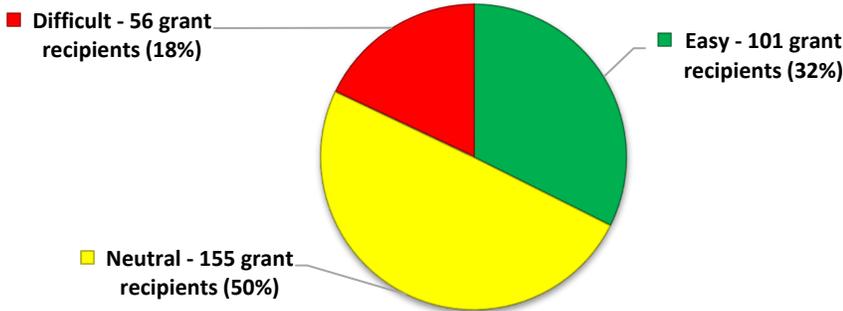


<b>2. How would you rate the ease in understanding program notices and waivers issued in response to the COVID-19 pandemic to help your agency meet the ESG-CV program's goals and objective?</b>		
Easy	101	32%
Neutral	155	50%

<sup>23</sup> Rounded down because number was less than a full percent. Specifically, it was 0.3 percent.

Questions and selection choices	Total	Percentage
Difficult	56	18%
<b>Total</b>	<b>312<sup>24</sup></b>	<b>100%</b>

**Ease in understanding HUD-issued ESG-CV program notices, guidance, and waivers**

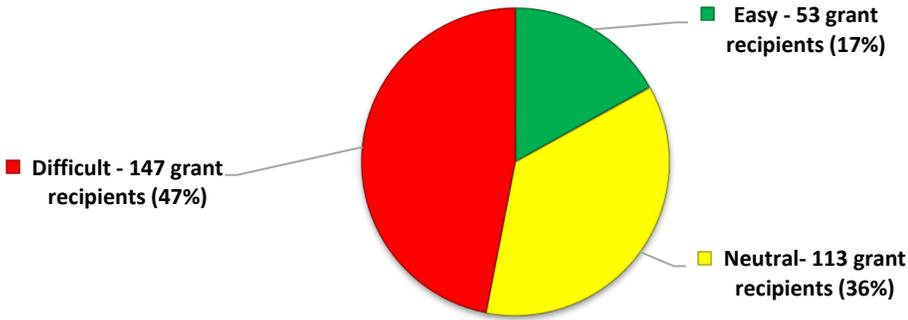


3. How would you rate the ease of implementing the ESG-CV program compared to your agency's regular annual ESG program?	Total	Percentage
Easy	53	17%
Neutral	113	36%
Difficult	147	47%
<b>Total</b>	<b>313</b>	<b>100%</b>

<sup>24</sup> A grant recipient indicated that it was not aware of the program notices and waivers. Therefore, the survey questionnaire did not branch out to this sub question for that particular respondent. As a result, there were only 312 respondents for this question.

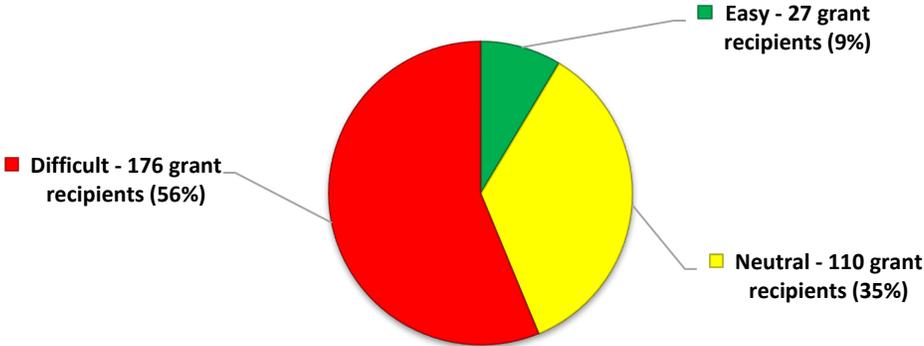
Questions and selection choices	Total	Percentage
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**Ease in implementing the ESG-CV program**



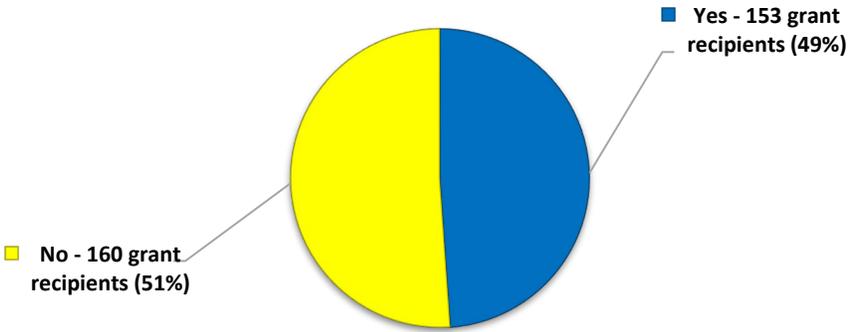
<b>4. How would you rate the challenge of spending your agency’s allocated ESG-CV funds to prevent, prepare for, and respond to coronavirus, compared to spending your regular annual ESG grant funds?</b>		
Easy	27	9%
Neutral	110	35%
Difficult	176	56%
<b>Total</b>	<b>313</b>	<b>100%</b>

**Challenge of spending allocated ESG-CV funds**



Questions and selection choices	Total	Percentage
<b>5. Has your agency experienced challenges as a result of the COVID-19 pandemic that have not allowed your agency to meet the goals of ESG-CV funds; specifically, to prevent, prepare for, and respond to coronavirus to help individuals and families who are homeless?</b>		
Yes	153	49%
No	160	51%
<b>Total</b>	<b>313</b>	<b>100%</b>

**Challenges as a result of the COVID-19 pandemic**



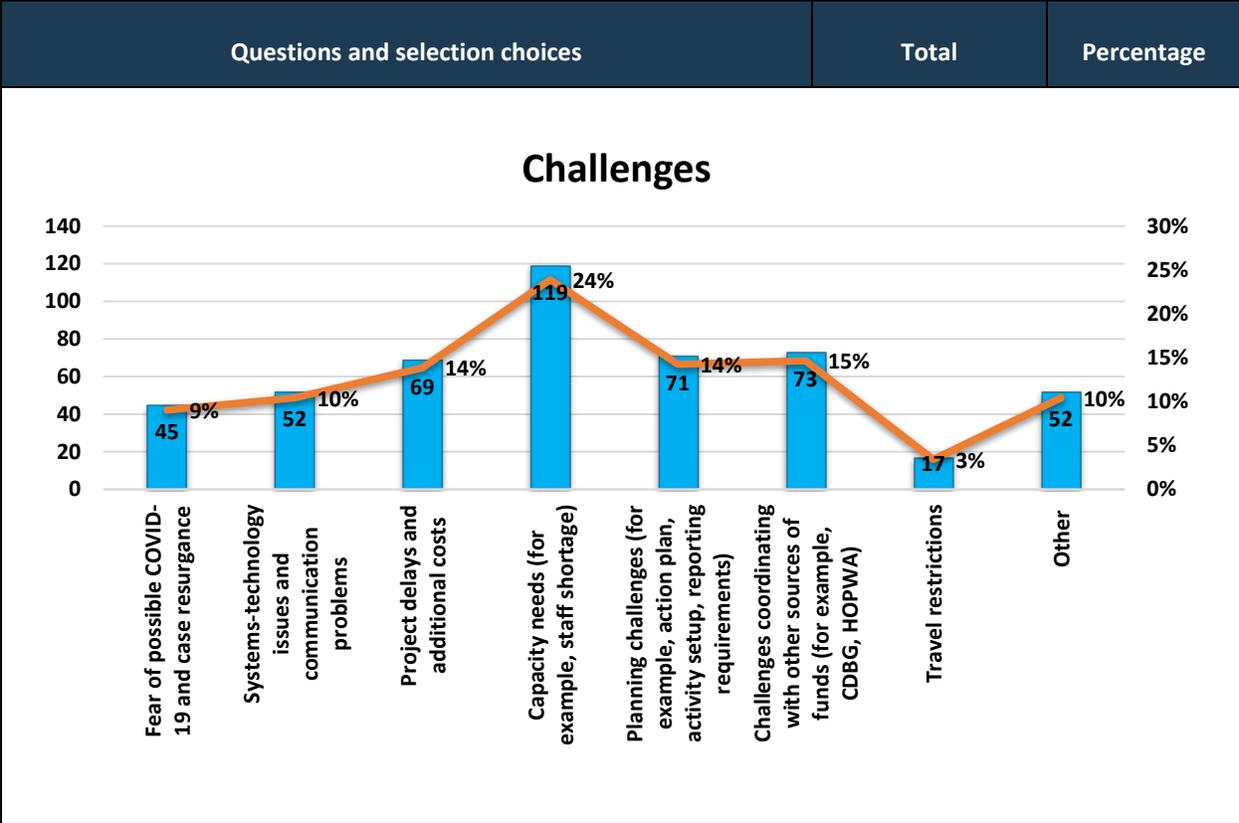
<b>6. If Yes, what are the specific challenges that are not allowing your agency to prevent, prepare for, and respond to coronavirus to help individuals and families who are homeless. Check all that apply.</b>		
Fear of possible COVID-19 and case resurgence	45	9%
Systems-technology issues and communication problems	52	10%
Project delays and additional costs	69	14%
Capacity needs (e.g. staff shortage)	119	24%
Planning challenges (e.g. action plan, activity setup, reporting requirements)	71	14%
Challenges coordinating with other sources of funds (e.g. CDBG, HOPWA)	73	15%

Questions and selection choices	Total	Percentage
Travel restrictions	17	3%
Other <sup>25</sup> : 1) Eviction moratorium/rent moratorium, 2) Shortage of housing, 3) Spending threshold deadlines, 4) IDIS and HMIS issues 5) Processing internal approvals, executing agreements and State Board of Accounts 6) Amount of funding sources of available, 7) Not having enough service providers with the capacity to utilize the funds, 8) Potential duplication of services and identifying more subrecipients willing to participate in the program, 9) COVID-19 infections in staff, 10) Inability to shelter individuals in congregate settings during the coldest months to avoid spreading coronavirus, 11) Lengthy environmental reviews, 12) Limited affordable housing inventory/resources, 13) Staff turnover and quarantine throughout the last fiscal year that's caused delays in our processes, 14) Issues related to land use issues in developing a shelter, 15) Increased bureaucracy, 16) Jurisdiction coordinating challenges, 17) Limited housing to place homeless under Rapid Rehousing, 18) Quarterly reporting, 19) Other funding available offering same service, 20) Income limits for homeless preventions are too low, 21) Earthquake sequence in the area, 22) Having to work remotely due to COVID-19, 23) Required to report through the Continuum of Care but not consult on activities, 24) Reluctance to do site-based reviews/monitoring, 25) Occupancy restrictions due to social distancing, 26) Guidelines around the use of Rapid Rehousing (RRH) and Housing Prevention	52	10%
<b>Total</b>	<b>498<sup>26</sup></b>	<b>100%<sup>27</sup></b>

<sup>25</sup> Listed by most to least common.

<sup>26</sup> The survey questionnaire allowed the 153 respondents that stated that they experienced challenges to check all of the challenges that applied to their agencies. As a result, there were 498 responses, as detailed in the Challenges table.

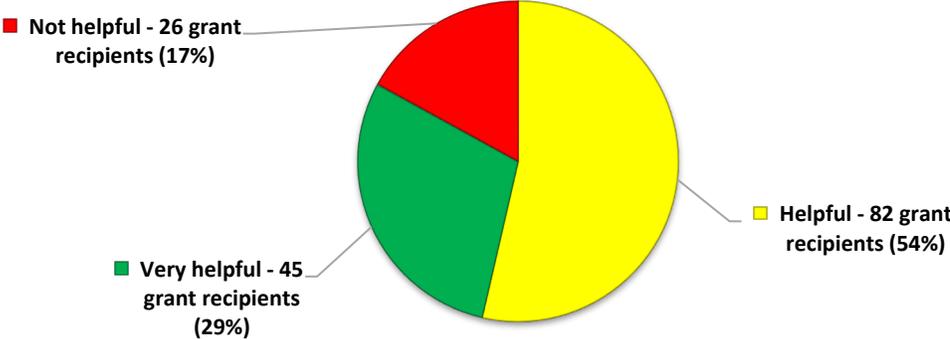
<sup>27</sup> There was a 1 percent difference due to rounding.



<p><b>7. If Yes, how would you rate HUD’s program notices and waivers intended to help address the challenges listed in the prior question? For instance, HUD waived the requirement of having to submit the Consolidated Annual Performance and Evaluation Report (CAPER) within 90 days and extended it to 180 days. Due to this waiver, it helped make it easier for your agency to be able to address one of its challenges if that challenge was capacity needs, because it allowed more time for your agency to complete the CAPER.</b></p>		
Very helpful	45	29%
Helpful	82	54%
Not helpful	26	17%
<b>Total</b>	<b>153</b>	<b>100%</b>

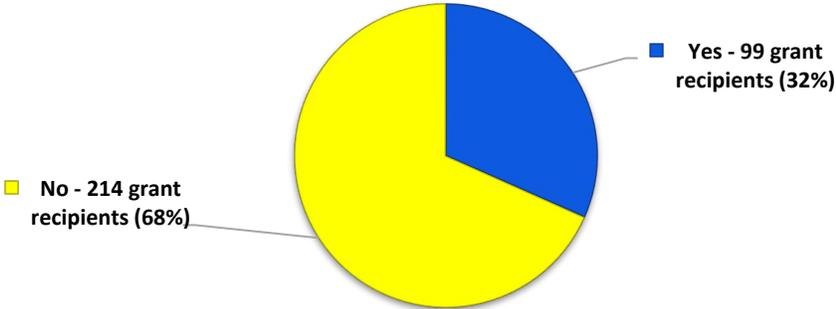
Questions and selection choices	Total	Percentage
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### HUD's program notices and waivers



<b>8. Does your agency need additional support from HUD to effectively administer the ESG-CV program during the COVID-19 pandemic?</b>		
Yes	99	32%
No	214	68%
<b>Total</b>	<b>313</b>	<b>100%</b>

### Additional support from HUD

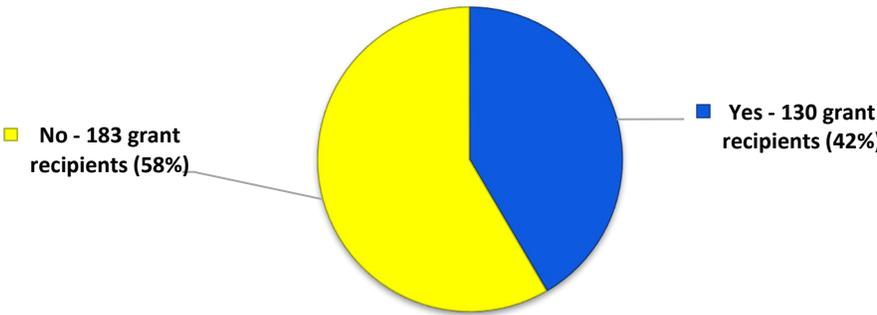


Questions and selection choices	Total	Percentage
<b>9. If Yes, what additional support is needed to effectively administer the ESG-CV program during the COVID-19 pandemic? Check all that apply.</b>		
More training	42	27%
More HUD assistance (such as HUD meetings to answer questions or concerns or providing remote technical assistance to address issues that were not anticipated from the pandemic)	60	39%
Other <sup>28</sup> : 1) More time to build subrecipients' capacity, 2) Maintain and more detailed HUD Technical Assistance, 3) More waivers, 4) Meeting quarterly reporting requirements and closer alignment with regular ESG reporting and tracking, 5) Make waivers and flexibilities automatic, 6) Continued evaluation of the ESG-CV program, 7) More training and detailed guidance, 8) Quicker response on AAQ and clear answers, 9) Waivers on the homeless definition, 10) Training that indicates how funds can be used in addition to rental payments, major renovation projects, 11) Less reporting via email, surveys, CAPER, IDIS, Sage, HMIS, and other mediums, 12) Direct assistance from HUD in explaining best practices and utilization of ESG-CV, 13) More time to spend funds and extend deadline, 14) A policy of some lenience in future monitoring during this time period, as long as agencies demonstrate good-faith and reasonable efforts to comply with rules	51	33%
<b>Total</b>	<b>153<sup>29</sup></b>	<b>100%<sup>30</sup></b>
<b>10. Does your agency anticipate future challenges in administering the ESG-CV program as a result of the COVID-19 pandemic and its impact on program operations?</b>		
Yes	130	42%
No	183	58%
<b>Total</b>	<b>313</b>	<b>100%</b>

<sup>28</sup> Listed by most to least common.

<sup>29</sup> The survey questionnaire allowed the 99 respondents that needed additional support from HUD to check all types of support needed. As a result, there were 153 responses.

<sup>30</sup> There was a 1 percent difference due to rounding.

Questions and selection choices	Total	Percentage									
<p style="text-align: center;"><b>Anticipating future challenges</b></p>  <p>A pie chart titled "Anticipating future challenges" is centered in the table. The chart is divided into two segments: a larger yellow segment representing "No" responses and a smaller blue segment representing "Yes" responses. Lines connect the labels to their respective segments.</p> <table border="1"> <thead> <tr> <th>Response</th> <th>Count</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>No</td> <td>183</td> <td>58%</td> </tr> <tr> <td>Yes</td> <td>130</td> <td>42%</td> </tr> </tbody> </table>			Response	Count	Percentage	No	183	58%	Yes	130	42%
Response	Count	Percentage									
No	183	58%									
Yes	130	42%									
<b>11. If Yes, what are the anticipated future challenges in administering the ESG-CV program that your agency anticipates as a result of the COVID-19 pandemic and its impact on program operations?</b>											
Continued fear of possible COVID-19 and case resurgence	48	12%									
Continued systems-technology issues and communication problems	24	6%									
Continued project delays and additional costs	59	15%									
Continued capacity needs (e.g. staff shortage)	95	24%									
Continued planning challenges (e.g. action plan, activity set up, reporting requirements)	59	15%									
Continued challenges coordinating with other sources of funds (e.g. CDBG, HOPWA)	59	15%									
Continued travel restrictions	10	2%									
Other <sup>31</sup> : 1) State of the housing market due to COVID-19 such as extension of eviction moratorium, eligibility tenant protections, landlord participation with Rapid Rehousing programs, building occupancy restrictions due to social-distancing, inspecting sites for rental activities, 2) Lack of affordable housing, 3) Expenditure deadline, 4) Coordination or competing with similar services of other funds such as FEMA funds, Treasury EGA funding,	48	12%									

<sup>31</sup> Listed by most to least common.

Questions and selection choices	Total	Percentage
duplication of benefits, 5) Capacity needs such as grantee and subrecipient staff time due to illness, 6) Stringent program notices and guidance needing revision and special permission from HUD on changes to scope outside amending the action plan and continue to commit funds, 7) Construction delays, 8) Continued grantee conclusion due to administrative changes and challenges that have put into place as well between ESG and ESG-CV identifying more subrecipients willing to participate in the program, 9) Continued challenges with affordable housing and needs after funding ends 2022, 10) Not being able to use relief dollars for marketing to “get the word out”, 11) Quarterly reporting		
<b>Total</b>	<b>402<sup>32</sup></b>	<b>100%<sup>33</sup></b>
<b>12. Did your agency receive other sources of non-HUD funding (e.g. Federal Emergency Management Agency, state, and local) to address homelessness?</b>		
Yes	197	63%
No	116	37%
<b>Total</b>	<b>313</b>	<b>100%</b>

### Non-HUD funding

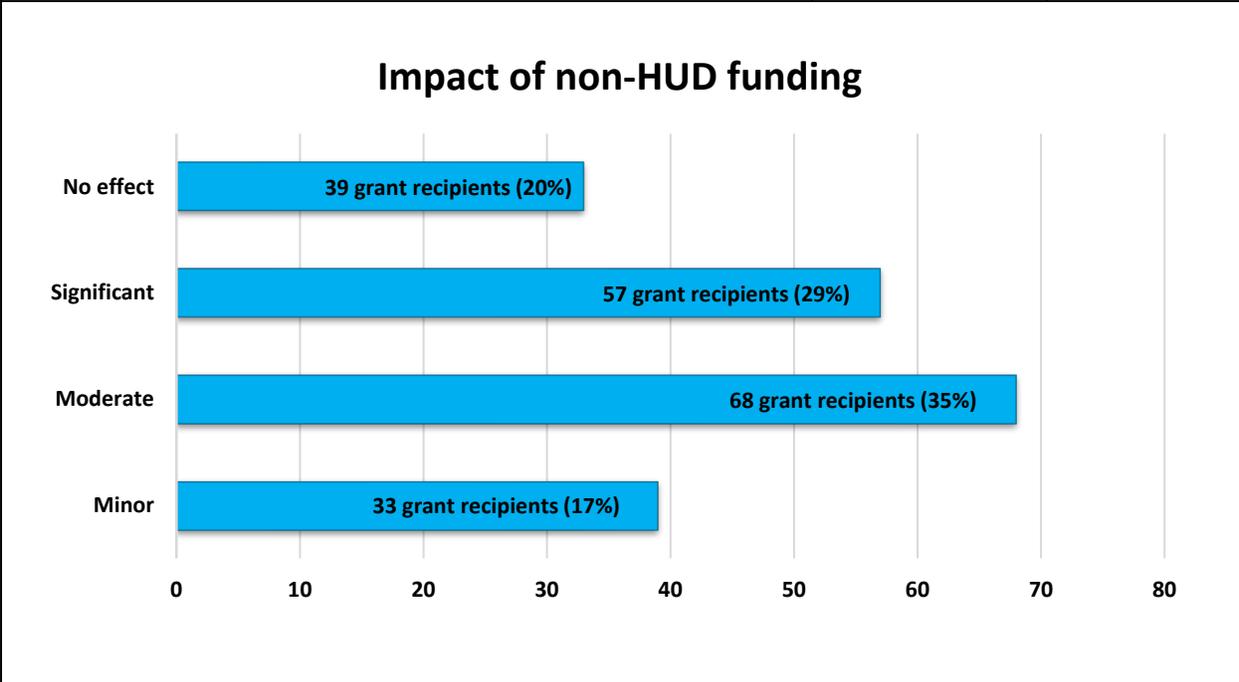
A pie chart titled "Non-HUD funding" showing the distribution of responses. The chart is divided into two segments: a larger blue segment representing "Yes - 197 grant recipients (63%)" and a smaller yellow segment representing "No - 116 grant recipients (37%)".

Response	Count	Percentage
Yes	197	63%
No	116	37%

<sup>32</sup> The survey questionnaire allowed the 130 respondents to check all the applicable anticipated future challenges in administering the ESG-CV program that their agency anticipated as a result of the COVID-19 pandemic and its impact on program operations. As a result, there were 402 responses.

<sup>33</sup> There was a 1 percent difference due to rounding.

Questions and selection choices	Total	Percentage
<b>13. If yes, to what extent has receiving other source of non-HUD funding impeded your spending of ESG-CV funds?</b>		
Minor	39	20%
Moderate	68	35%
Significant	57	29%
No effect	33	17%
<b>Total</b>	<b>197</b>	<b>100%<sup>34</sup></b>

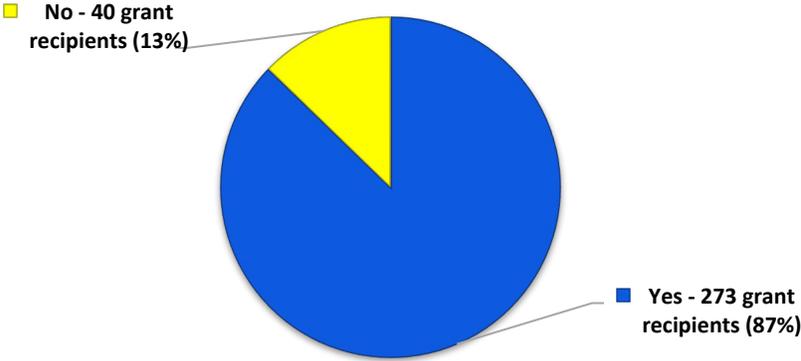


<b>14. Did your agency grant ESG-CV funds to subrecipients to administer?</b>		
Yes	273	87%
No	40	13%
<b>Total</b>	<b>313</b>	<b>100%</b>

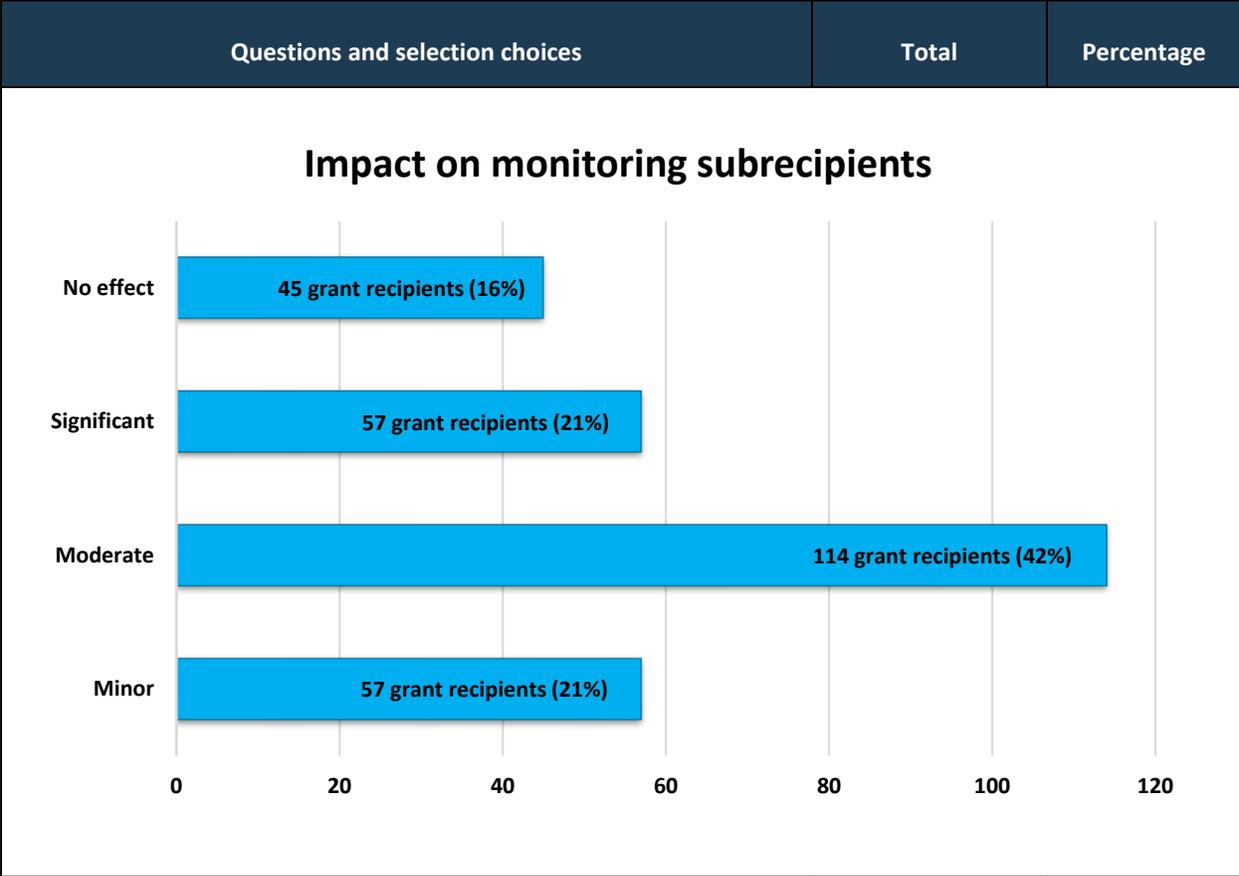
<sup>34</sup> There was a 1 percent difference due to rounding.

Questions and selection choices	Total	Percentage
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**Provided ESG-CV funds to subrecipients**



15. If Yes, to what extent has the COVID 19 pandemic impacted your agency's ability to effectively monitor the ESG-CV program being administered by subrecipient(s)?		
Minor	57	21%
Moderate	114	42%
Significant	57	21%
No effect	45	16%
<b>Total</b>	<b>273</b>	<b>100%</b>



16. Does your agency expect to use a majority or all of its ESG-CV funds by the spending deadline of September 30, 2022? Check all that apply.	Total	Percentage
Yes, all funding will be used	96	24%
Yes, a majority of the funds will be used	115	29%
Yes, but extensions may be needed	156	39%
No, significant amounts will remain unused due to various challenges	31	8%
No, significant amounts will remain unused due to lack of need	4	1%
<b>Total</b>	<b>402<sup>35</sup></b>	<b>100%<sup>36</sup></b>

<sup>35</sup> The survey questionnaire allowed the 130 respondents to check all applicable anticipated future challenges in administering the ESG-CV program that their agency anticipated as a result of the COVID-19 pandemic and its impact on program operations. As a result, there were 402 responses.

<sup>36</sup> There was a 1 percent difference due to rounding.

