

Texas Department of Housing and Community Affairs
Emergency Solutions Grants (ESG) Program
Guide on Level of Environmental Review Required for ESG Activities - (Rev. 08/23/12)

I. Street Outreach Activities

#	Activity	Specific Activity	Level of Environmental Review
1.	Engagement	Initial assessment of needs and eligibility	Exempt – 24 CFR 58.34 (a)(1) (4)
2.	Engagement	Providing crisis counseling	Exempt – 24 CFR 58.34 (a)(4)
3.	Engagement	Providing meals, blankets, clothes, toiletries & connecting/providing information	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(2)
4.	Engagement	Referrals to programs targeted to homeless people, mainstream social services, housing programs (emergency shelter, transitional, community-based services, permanent supportive housing, and rapid re-housing programs)	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(2)
5.	Case Management	Conducting the initial evaluation including verifying and documenting eligibility	Exempt – 24 CFR 58.34 (a)(1) (4)
6.	Case Management	Counseling	Exempt – 24 CFR 58.34 (a)(4)
7.	Case Management	Developing, securing & coordinating services	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(2)
8.	Case Management	Obtaining Federal, State, and local benefits	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(2)
9.	Case Management	Monitoring and evaluating program participant progress	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(2)
10.	Case Management	Providing information and referrals to other providers	Exempt – 24 CFR 58.34(a)(3)
11.	Case Management	Developing an individualized housing and service plan, including planning a path to permanent housing stability	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(2)
12.	Case Management	Developing an individualized housing and service plan, including planning a path to permanent housing stability	Exempt – 24 CFR 58.34 (1)

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#	Activity	Specific Activity	Level of Environmental Review
13.	Emergency Health Services	Assess participant's health issues & develop treatment plan	Exempt – 24 CFR 58.34 (a)(1) (4)
14.	Emergency Health Services	Assist participant in understanding health needs	Exempt – 24 CFR 58.34 (a)(4)
15.	Emergency Health Services	Provide directly or assist participant in obtaining emergency medical treatment	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(2)
16.	Emergency Health Services	Provide medication & follow-up services	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(2)
17.	Emergency Mental Health Services	Crisis interventions	Exempt – 24 CFR 58.34(a)(4)
18.	Emergency Mental Health Services	Prescription of psychotropic medications	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(2)
19.	Emergency Mental Health Services	Explanation about the use and management of medications	Exempt – 24 CFR 58.34(a)(4)
20.	Emergency Mental Health Services	Combinations of therapeutic approaches to address multiple problems	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(2)
21.	Transportation	Cost of a program participant's travel on public transportation	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(3)
22.	Transportation	Mileage allowance for service workers to visit program participants in POV	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(3)

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#	Activity	Specific Activity	Level of Environmental Review
23.	Transportation	Cost of purchasing/leasing a vehicle for staff to transport participants/staff serving program participants, and the cost of gas, insurance, taxes and maintenance for the vehicle	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(3)
24.	Transportation	The travel costs of recipient or sub-recipient staff to accompany or assist program participants to use public transportation.	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(3)
25.	Services for Special Populations	ESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are listed as eligible activities in this section.	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(2)

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II. Emergency Shelter Activities

#	Activity	Sub-Category	Specific Activity	Level of Environmental Review
1.	Essential Services	Case Management	Use centralized /coordinated assessment system	Exempt – 24 CFR 58.34(a)(2)
2.	Essential Services	Case Management	Conducting initial evaluation including verification & documentation of eligibility	Exempt – 24 CFR 58.34(a)(1)
3.	Essential Services	Case Management	Counseling	Exempt – 24 CFR 58.34(a)(4)
4.	Essential Services	Case Management	Developing, securing & coordinating services & obtaining Federal, State & local benefits	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(2)
5.	Essential Services	Case Management	Monitoring and evaluating program participant progress	Exempt – 24 CFR 58.34(a)(3)
6.	Essential Services	Case Management	Providing information and referrals to other providers	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(2)
7.	Essential Services	Case Management	Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking	Exempt – 24 CFR 58.34 (a)(4)

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#	Activity	Sub-Category	Specific Activity	Level of Environmental Review
8.	Essential Services	Case Management	Developing an individualized housing and service plan, including planning a path to permanent housing stability	Exempt – 24 CFR 58.34 (a)(1)
9.	Essential Services	Child Care	Costs of child care including meals, snacks, developmental activities	Exempt – 24 CFR 58.34(a)(4)
10.	Essential Services	Education Services	When necessary for participant to obtain & maintain housing, improving knowledge & basic educational skills	Exempt – 24 CFR 58.34(a)(4)
11.	Essential Services	Employment assistance and job training	Employment assistance and job training	Exempt – 24 CFR 58.34(a)(4)
12.	Essential Services	Outpatient health services	Outpatient health services	Exempt – 24 CFR 58.34(a)(4)
13.	Essential Services	Legal Services	Legal Services	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(2) or (b)(3)
14.	Essential Services	Life Skills Training	Life Skills Training	Exempt – 24 CFR 58.34 (a)(4)(9)

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#	Activity	Sub-Category	Specific Activity	Level of Environmental Review
15.	Essential Services	Mental Health Services Mental Health Services	Mental Health Services	Exempt – 24 CFR 58.34 (a)(4)
16.	Essential Services	Substance Abuse Treatment Services	Substance Abuse Treatment Services	Exempt – 24 CFR 58.34 (a)(4)
17.	Essential Services	Transportation	Transportation	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(3)
18.	Essential Services	Services for Special Populations	ESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are listed as eligible activities in this section.	The activities conducted for special populations must follow the same level of environmental review described above for the specific activity conducted
19.	Rehabilitation and Renovation	Rehabilitation and Renovation	Labor, materials, tools and other costs for renovation.	24 CFR 58.35 (a) Categorical exclusions subject to 58.5

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#	Activity	Sub-Category	Specific Activity	Level of Environmental Review
20.	Shelter Operations	Maintenance	Maintenance – Per HUD’s definition maintenance include activities such as cleaning, painting, replacement of appliances (free standing such as refrigerator), protective/preventative for example pest control.	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(3)
21.	Shelter Operations	Minor Repair	Minor repairs include the replacement of fixed appurtenances such as toilets or sinks, crown molding, drywall patching and roof repair.	Categorically Excluded Subject to 58.5 – 24 CFR 58.35(a)(5)
22.	Shelter Operations	Rent	Leasing office space - On-going rent payments for office space	Categorically Excluded <u>not</u> subject to 58.5 – 24 CFR 58.35 (b)(3)
23.	Shelter Operations	Rent	Leasing office space - New Lease	Categorically Excluded Subject to 58.5 – 24 CFR 58.35(a)(5)
24.	Shelter Operations	Rent	Leasing office space - Renewal of Lease	Categorically Excluded Subject to 58.5 – 24 CFR 58.35(a)(5)
25.	Shelter Operations	Maintenance	Security, Fuel, Equipment, Utilities, Food, Furnishings, Supplies necessary for the operation of the Emergency Shelter	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(3)
26.	Shelter Operations	Hotel/motel voucher	Hotel/motel voucher	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(1)

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#	Activity	Sub-Category	Specific Activity	Level of Environmental Review
27.	Costs of providing URA assistance	Costs of providing URA assistance	Costs of providing URA assistance - (relocation payments & other assistance to person displaced by projects assisted by ESG dollars). *Persons that receive URA assistance are not considered participants and assistance is not considered rental assistance nor is it housing relocation & stabilization services.	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(2)

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III. Homeless Prevention and Rapid Re-Housing Activities

(Since the cost allowed for Homelessness Prevention and Rapid Re-Housing are the same, it is the participant's eligibility conditions that distinguish them).

#	Activity	Subcategory	Specific Activity	Level of Environmental Review
1.	Housing Relocation & Stabilization Services	Financial Assistance Costs	Financial assistance costs: <ul style="list-style-type: none"> ▪ Last month's rent ▪ Rental application fees ▪ Security deposits ▪ Utility deposits ▪ Utility payments ▪ Moving costs 	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(2)
2.	Housing Relocation & Stabilization Services	Housing Services Costs - Housing search and placement	Assessment of housing barriers, needs & preferences	Exempt – 24 CFR 58.34 (a)(1)
3.	Housing Relocation & Stabilization Services	Housing Services Costs - Housing search and placement	Development of an action plan for locating housing	Exempt – 24 CFR 58.34 (a)(1)
4.	Housing Relocation & Stabilization Services	Housing Services Costs - Housing search and placement	Housing search	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(2)
5.	Housing Relocation & Stabilization Services	Housing Services Costs - Housing search and placement	Outreach to & negotiations with owners	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(2)

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#	Activity	Subcategory	Specific Activity	Level of Environmental Review
6.	Housing Relocation & Stabilization Services	Housing Services Costs - Housing search and placement	Assistance with submitting rental applications & understanding leases	Exempt - 24 CFR 58.34 (a)(4)
7.	Housing Relocation & Stabilization Services	Housing Services Costs - Housing search and placement	Assessment of housing compliance with ESG	Exempt - 24 CFR 58.34 (a)(3)
8.	Housing Relocation & Stabilization Services	Housing Services Costs - Housing search and placement	Assistance with obtaining utilities & making moving arrangements	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(2)
9.	Housing Relocation & Stabilization Services	Housing Services Costs - Housing search and placement	Tenant Counseling	Exempt - 24 CFR 58.34 (a)(4)
10.	Housing Relocation & Stabilization Services	Housing Services Costs - Housing stability case management	Use centralized /coordinated assessment system	Exempt - 24 CFR 58.34 (a)(2)
11.	Housing Relocation & Stabilization Services	Housing Services Costs - Housing stability case management	Conducting initial evaluation including verification & documentation of eligibility	Exempt - 24 CFR 58.34 (a)(1)
12.	Housing Relocation & Stabilization Services	Housing Services Costs - Housing stability case management	Counseling	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(2)

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#	Activity	Subcategory	Specific Activity	Level of Environmental Review
13.	Housing Relocation & Stabilization Services	Housing Services Costs - Housing stability case management	Developing, securing & coordinating services & obtaining Federal, State & local benefits	
14.	Housing Relocation & Stabilization Services	Housing Services Costs - Housing stability case management	Monitoring and evaluating program participant progress	Exempt - 24 CFR 58.34 (a)(3)
15.	Housing Relocation & Stabilization Services	Housing Services Costs - mediation	Mediation necessary to prevent participant from losing permanent housing	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(2)
16.	Housing Relocation & Stabilization Services	Housing Services Costs - legal services	Legal Services – as outlined in Sec. 576.102(a)(1)(vi), & additionally resolve legal matters that that prohibit or result in the loss of permanent housing	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(2)
17.	Housing Relocation & Stabilization Services	Housing Services Costs - credit repair	Credit Repair – credit counseling, other services	Exempt - 24 CFR 58.34 (a)(4)
18.	Short Term & Medium Term Rental Housing		Payment of rental arrears, one time payment	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(2)
19.	Short Term & Medium Term Rental Housing	Tenant Based Rental Assistance	Project Based Rental Assistance - Tenant Based Rental Assistance	Categorically Excluded not subject to 58.5 – 24 CFR 58.35(b)(1)

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#	Activity	Subcategory	Specific Activity	Level of Environmental Review
20.	Short Term & Medium Term Rental Housing	Project Based Rental Assistance	Project Based Rental Assistance - with Rehabilitation	Categorically Excluded Subject to 58.5 – 24 CFR 58.(3)
21.	Short Term & Medium Term Rental Housing	Project Based Rental Assistance	Project Based Rental Assistance - with new construction	Environmental Assessment
22.	Short Term & Medium Term Rental Housing	Project Based Rental Assistance	Project Based Rental Assistance - As a set-aside to units in existence with no construction related/planned for units	Categorically Excluded Not Subject to 58.5 – 24 CFR 58.35(b)(2)

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IV. Homeless Management Information System

#	Activity	Specific Activity	Level of Environmental Review
1.	Cost of contributing data and operating HMIS	Purchasing or leasing computer hardware	Categorically Excluded Not Subject to 58.5 – 24 CFR 58.35(b)(3)
2.	Cost of contributing data and operating HMIS	Purchasing software or software licenses	Categorically Excluded Not Subject to 58.5 – 24 CFR 58.35(b)(3)
3.	Cost of contributing data and operating HMIS	Purchasing or leasing equipment, including telephones, fax machines, and furniture	Categorically Excluded Not Subject to 58.5 – 24 CFR 58.35(b)(3)
4.	Cost of contributing data and operating HMIS	Obtaining technical support	Categorically Excluded Not Subject to 58.5 – 24 CFR 58.35(b)(3)
5.	Cost of contributing data and operating HMIS	Leasing office space - On-going rent payments for office space	Categorically Excluded <u>not</u> subject to 58.5 – 24 CFR 58.35 (b)(3)
6.	Cost of contributing data and operating HMIS	Leasing office space - New Lease	Categorically Excluded <u>Subject to</u> 58.5 – 24 CFR 58.35(a)(5)
7.	Cost of contributing data and operating HMIS	Leasing office space - Renewal of Lease	Categorically Excluded <u>Subject to</u> 58.5 – 24 CFR 58.35(a)(5)

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#	Activity	Specific Activity	Level of Environmental Review
8.	Cost of contributing data and operating HMIS	Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS	Categorically Excluded Not Subject to 58.5 – 24 CFR 58.35(b)(3)
9.	Cost of contributing data and operating HMIS	Paying salaries for operating HMIS	Categorically Excluded Not Subject to 58.5 – 24 CFR 58.35(b)(3)
10.	Cost of contributing data and operating HMIS	Paying costs of staff to travel to and attend HUD-sponsored and HUD-approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act	Categorically Excluded Not Subject to 58.5 – 24 CFR 58.35(b)(3)
11.	Cost of contributing data and operating HMIS	Paying staff travel costs to conduct intake	Categorically Excluded Not Subject to 58.5 – 24 CFR 58.35(b)(3)
12.	Cost of contributing data and operating HMIS	Paying participation fees charged by the HMIS Lead, if the subrecipient is not the HMIS Lead. The HMIS Lead is the entity designated by the Continuum of Care to operate the area’s HMIS	Categorically Excluded Not Subject to 58.5 – 24 CFR 58.35(b)(3)
13.	HMIS Software & Data	HMIS Software & Data	Exempt - 24 CFR 58.34 (a)(2)
14.	Comparable database for victim & legal service providers	Comparable database for victim & legal service providers	The HMIS activities conducted by victim service & legal service providers follows the same level of environmental review described for each specific HMIS activity.

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V. Administrative Activities

#	Activity	Specific Activity	Level of Environmental Review
1.	General management, oversight & coordination	Salaries, Wages and related costs of the recipient's staff, sub-recipient's staff, other staff engaged in program administration	Categorically Excluded Not Subject to 58.5 – 24 CFR 58.35(b)(3)
2.	General management, oversight & coordination	Travel costs incurred for monitoring of sub-recipients	Categorically Excluded Not Subject to 58.5 – 24 CFR 58.35(b)(3)
3.	General management, oversight & coordination	Administrative services performed under 3 rd party contracts/agreements (Gen. Legal Services, Accounting & Audit)	Categorically Excluded Not Subject to 58.5 – 24 CFR 58.35(b)(3)
4.	General management, oversight & coordination	Other costs for goods & services (rental/purchase of equipment, insurance, utilities, office supplies & maintenance of office space.	Categorically Excluded Not Subject to 58.5 – 24 CFR 58.35(b)(3)
5.	Training	Training on ESG requirements – costs of attending training on ESG requirements & attending HUD sponsored ESG trainings	Exempt - 24 CFR 58.34 (a)(9)
6.	Environmental Review	The costs of carrying out the environmental review responsibilities.	Exempt - 24 CFR 58.34 (a)(1)