



**Rural Nevada**  
CONTINUUM OF CARE

# ELIGIBILITY FOR ESG & RNCOC PROGRAMS

## Quick Reference Guide

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## Overview

This guide outlines the eligibility criteria for **Emergency Solutions Grant (ESG) and Rural Nevada Continuum of Care (RNCoC) programs**, including Street Outreach, Emergency Shelter, Rapid Re-Housing (RRH), and Homelessness Prevention (HP).

## General Eligibility Criteria

To qualify for ESG and RNCoC programs, participants must meet one of the **HUD Homeless Definition Categories**:

- **Category 1: Literally Homeless** – Lacks a fixed, regular, and adequate nighttime residence.
- **Category 2: Imminent Risk of Homelessness** – Will lose housing within 14 days and lacks resources.
- **Category 3: Homeless Under Other Federal Statutes** – Applies to youth and families defined as homeless by other federal programs.
- **Category 4: Fleeing Domestic Violence** – Includes those escaping domestic violence, dating violence, sexual assault, or stalking.

## ESG & RNCoC Program-Specific Eligibility

Program	Eligibility Criteria
<b>Street Outreach</b>	Must be literally homeless (Category 1). Services include case management, health/mental health services, and transportation.
<b>Emergency Shelter</b>	Must be homeless under Category 1, 2, 3, or 4. Services include shelter, case management, and support services.
<b>Rapid Re-Housing (RRH)</b>	Must be literally homeless (Category 1 or 4) and moving into a unit meeting HUD habitability and lead-based paint standards.
<b>Homelessness Prevention (HP)</b>	Must meet Category 2, 3, or 4 or be at risk of homelessness. Income must be below 30% of Area Median Income (AMI).

## Income Requirements

- RRH & HP applicants must have an annual income at or below 30% of AMI.
- Income includes wages, Social Security, disability benefits, and other financial resources.
- Income must be verified at program entry and recertified every 3 months for HP and annually for RRH.

## Required Documentation

Documentation Type	Requirement
<b>Homeless Status</b>	Third-party verification (shelter records, outreach reports) preferred, self-certification if necessary.
<b>Income Verification</b>	Pay stubs, benefit statements, tax returns.
<b>Disability Verification (if applicable)</b>	Medical records or certification from a qualified professional.
<b>Rental Agreement (for RRH/HP)</b>	Lease agreement between landlord and tenant.

## Special Considerations

- **Domestic Violence Survivors:** Must have access to confidential services and alternative verification methods.
- **Veterans:** Should be referred to VA programs when applicable.
- **Youth & Families:** Must be connected to educational and childcare resources.
- **Undocumented Individuals:** RNCoc affirms fair, equal, and barrier-reduced access to Coordinated Entry for all people, consistent with RNCoc policies on nondiscrimination, fair access, and grievance/appeal.

### What staff may (and may not) ask:

- **Do not ask** about citizenship or immigration status to allow a person to be screened, assessed, prioritized, referred, or safety-planned through CE. That front-door access is governed by RNCoc nondiscrimination and fair access rules.
- **Ask about** status only if a participant elects to pursue a specific benefit that may legally require immigration verification (e.g., certain rental/utility assistance).

## Why this matters now

- In July 2025, the U.S. Attorney General withdrew the 2001 “life or safety” specification that had exempted several community services (including some homelessness services) from PRWORA’s immigrant eligibility restrictions, effective Aug 15, 2025.
- In Nov 2025, HUD clarified its interpretation that PRWORA applies to Community Planning & Development (CPD) grant programs, including ESG and CoC; HUD will issue program-specific verification guidance and procedures. Until HUD/Nevada issues that guidance, providers should not create new barriers to CE access and should limit any immigration inquiries to benefits for which the funder requires verification.

## How SAVE fits

- SAVE is a DHS/USCIS tool some government agencies use to verify immigration status for a particular benefit; SAVE does not determine eligibility, and it may be used only to verify status for the benefit at issue.

## Privacy, safety, and complaints

- If verification is pursued for a specific benefit, inform the participant—in plain language—that any SAVE check is used only to verify eligibility for that benefit, not for immigration enforcement; collect only the minimum information needed; and protect confidentiality per RNCoc privacy/records rules.
- Participants may use RNCoc’s complaint/grievance process if they believe they were improperly screened or denied access.

**Heads-up:** A 2016 HUD fact sheet previously identified certain ESG/CoC activities (e.g., rapid rehousing) as “life/safety” exceptions; that interpretation is no longer controlling following the 2025 Attorney General withdrawal. RNCoc will update local procedures when HUD/Nevada issues program-specific guidance.

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## Need Help?

For further details, refer to the **ESG & RNCoc Written Standards** @ <https://ruralnevadacoc.org/resources-page/> or contact your program administrator.