

**Iowa Statewide Emergency Solutions Grant (ESG) Program  
and Shelter Assistance Fund  
Competition: 2026 & 2027 Calendar Years**



**Comments Invited:**

The Iowa Finance Authority (IFA) is opening a new competition for the Iowa Statewide Emergency Solutions Grant (ESG) and Shelter Assistance Fund (SAF). The competition will be for grant funding for the 2026 and 2027 calendar years. IFA invited public and stakeholder comments on the proposed application. Comments received by the August 11, 2025, submission deadline are listed below with corresponding responses from IFA. IFA appreciates everyone who took time to review the draft application and share their feedback.

**Comments Received and IFA's Responses:**

1. Scoring Criteria for Transitional Recovery Programs (draft Section III, p. 8 – 10): While the draft prioritizes emergency shelters over legacy transitional shelters, many women experiencing homelessness – particularly survivors of domestic violence, incarceration, or addiction – require structured transitional housing before moving into permanent homes. We recommend that scoring criteria include additional points for outcome-proven transitional programs, specifically those demonstrating long-term housing stability, reduced recidivism, and sustained recovery for vulnerable populations.

*Response: The draft Shelter Funding Priorities are the same as those identified in the previous two-year competition applications starting in 2022. Transitional shelter/housing and shelters that serve specific targeted populations are eligible to apply; however, they will not receive additional "priority" points beyond the baseline priority points awarded to shelters in the scoring system. It has been noted in prior competitions and public comments that such shelters are eligible for additional public funding from other sources that is not available to shelters serving a broader population. No change made to the final application.*

2. Allowable Costs for Recovery-Aligned Supports (draft Section IV, p. 14 – 16): The draft currently limits eligible expenses to basic shelter operations and services. For recovery housing providers, UA testing, peer support, and other evidence-based recovery interventions are critical to tenancy retention and preventing returns to homelessness. We request that ESG shelter funding explicitly allow reasonable allocations for these supports when directly tied to housing stability outcomes.

*Response: Expenditure of ESG funding for emergency shelter is limited to the eligible activities set forth in 24 CFR Part 576 and Iowa Administrative Code 265, Chapter 42. As referenced in the draft application, applicants are encouraged to refer to the federal ESG rules and regulations for full details on eligible activities related to shelter, specifically 24 CFR Part 576.102. No change made to the final application.*

3. Equitable Consideration for Gender-Specific Services in Regional Competitions (draft Section II, p. 5 – 7): Regionalized funding for Rapids Rehousing and Homelessness Prevention could unintentionally disadvantage programs that serve only women and transgender women. We recommend adding language that ensures gender-specific providers are not deprioritized in regional selection processes, given the documented safety and trauma-recovery needs of these populations.

*Response: As in previous competitions, multiple agencies may apply for Rapid Rehousing (RRH) and Homelessness Prevention (HP) assistance funding within the overall maximum eligible application amounts specified for the region. IFA's expectation is that any award of RRH and HP funding will be premised on services being available on a reasonable equitable basis throughout that region. Agencies providing services within a region should coordinate with one another to ensure that their combined application requests do not exceed their regional limit as posted by IFA for the current competition. Prioritization in this regard appears to be a conversation best had with local partners as you work together to determine the best way to approach application submissions for RRH and HP assistance in your region. No change made to the final application.*

4. We are supportive of the continuation of the two-year application cycle, as it is an efficient process that allows applicants and program administrators more time and resources to focus on the difficult work of meeting the housing and service needs of Iowans experiencing homelessness.

*Response: IFA appreciates support for the two-year application cycle and hopes it has been helpful in alleviating the administrative burden of an annual ESG and SAF competition.*

5. We disagree with the application proposal to prioritize general population shelters, over emergency shelter for specific populations. Historically survivors of domestic violence have faced discrimination when attempting to access shelter, even though recent iterations of VAWA have now prohibited this conduct, survivors of domestic violence and their children may still feel unwelcome in shelter due to pressure to sign releases of their personally identifying information or because the shelter believes it isn't able to accommodate their increased safety needs. Further we encourage IFA to consider prioritizing crisis shelters serving families as the 2024 Iowa homelessness needs assessment identified that there is a greater percentage gap in the crisis needs of families as opposed to the crisis needs of individuals. Further research on adverse childhood experiences of trauma (such as homelessness) have demonstrated a clear need for children's experiences of homelessness to be as brief and rare as possible. The state did see great results in ending homelessness when it prioritized services to veterans, now we should do the same for families. Note we do recognize that there is a greater need for rapid rehousing projects for general population homelessness. Lastly ICADV does support IFA's approach to prioritize shelter funding for areas outside of entitlement cities, statewide coverage of homelessness services is vital, and any Iowa should be able to receive the support to end their homelessness regardless of zip code.

*Response: (1) As noted above, the draft Shelter Funding Priorities are the same as those identified in the previous two-year competition applications starting in 2022. Shelters that serve specific targeted populations are eligible to apply; however, they will not receive additional "priority" points beyond the baseline priority points awarded to shelters in the scoring system. It has been noted in prior competitions and public comments that such shelters are eligible for additional public funding from other sources that is not available to shelters serving a broader population. No change made to the final application. (2) IFA agrees that there is a strong need for shelters serving families in Iowa. However, making any changes to the current scoring system would require careful consideration and planning as well as opportunities for feedback from partners. Since IFA does not have the time or staff capacity to undertake that sort of analysis at this time, no change is being made to the final application. However, we will note this comment for future consideration. (3) As a point of clarification, IFA's priorities include shelters serving areas outside federal Entitlement Cities that receive additional ESG funds directly from HUD specifically. This year, Des Moines is the only Entitlement City receiving a direct allocation of ESG funding from HUD.*

6. In the federal and state requirements section I believe that the text regarding the Violence Against Women Act reauthorization should read as the Violence Against Women Act (VAWA) Reauthorization of 2022 and HUD Final Rule Implementing VAWA, including protections against denial of assistance or admission, termination and eviction protections, VAWA Notice and Certification, and VAWA Emergency Transfer Plan.

*Response: IFA has updated the draft VAWA Reauthorization of 2013 language to read VAWA Reauthorization of 2022 in the final application.*

7. Clarify Eligibility for Culturally-Specific Shelters:
  - The application should clearly state that culturally and linguistically specific shelters – especially those serving immigrants, refugees, and limited-English-proficient clients – are eligible for ESG/SAF funding, even if they do not receive HUD funding from other programs.
  - It would help to explicitly confirm that "shelter" includes temporary housing models that meet all zoning and safety requirements but are structured as a small-scale, family-focused residences.

*Response: Eligible applicants are defined in Iowa Administrative Code 265, Chapter 41 (SAF) and Chapter 42 (ESG). When applying for shelter assistance as an eligible activity, the shelter must meet the definition of "homeless shelter" or "shelter" in full. IFA is not able to revise or enhance the definition set forth in Iowa Administrative Code. Receipt of funding from other HUD programs is not referenced as a requirement in the definition of "homeless shelter" or "shelter."*

8. Recognition of Immigrant and Refugee Needs:

- Many newly arrived families are at risk of homelessness immediately upon arrival due to lack of credit, rental history, or local connections. The Homelessness Prevention and Rapid Rehousing sections should encourage outreach to and prioritization of these hard-to-serve populations.
- The Coordinated Entry and Housing First language should acknowledge the need for interpretation, translated materials, and culturally appropriate services.

*Response: Newly arrived immigrant or refugee families are not by definition categorized as meeting HUD's definition of homelessness. Competition applicants must serve persons in Iowa who are experiencing homelessness according to HUD's definition, as applicable to each activity type (shelter, street outreach, RRH, or HP). Please refer to the Competition Information section of the application for more information on individuals and/or families eligible for assistance under ESG and SAF by activity type as well as a link to criteria for defining homelessness under HUD's definition.*

9. Match Requirement Flexibility:

- The 75% match requirement for ESG can be a barrier for smaller or newer nonprofits. We recommend allowing in-kind services (including volunteer hours and donated goods) to count toward the match for both shelter and rapid rehousing activities.

*Response: IFA acknowledges the significant hardship that the 100% ESG federal match requirement presents. Historically, IFA has passed 75% of HUD's matching requirement on to ESG subrecipients. In the 2026 and 2027 competition, IFA is reducing the matching requirement for ESG subrecipients to 65% with a commitment to study further in future years. The "Competition Information" section of the final application has been updated to reflect the new 65% required match for ESG subrecipients in the 2026 and 2027 competition. Also, please refer to the federal ESG regulations at 24 CFR 576.201 to learn more about eligible types of matching contributions, including both cash and noncash contributions. The ESG federal regulations further define how the amount of match provided through noncash contributions must be calculated. Lastly, IFA is not required to match the first \$100,000 of the State's fiscal year ESG grant provided the benefit of this exception is passed on to the subrecipients that are least capable of providing matching contributions. After approval of all recommended funding awards by the IFA Board of Directors, ESG subrecipients that believe they meet that criteria (i.e., least capable of providing matching contributions) should submit a letter of request to IFA asking for approval to waive their match requirement. IFA will review all exceptions to match policy requests received and notify subrecipients of approval or denial prior to contracting for the grant award.*

10. Support for Smaller Regional Providers:

- In regions where only one or two agencies serve specific populations, the scoring criteria should ensure smaller, culturally specific providers are not disadvantaged in competition with large multi-county agencies.
- Consider awarding points for demonstrated partnerships between mainstream providers and culturally specific organization.

*Response: As in previous competitions, multiple agencies may apply for Rapid Rehousing (RRH) and Homelessness Prevention (HP) assistance funding within the overall maximum eligible application amounts specified for the region. IFA's expectation is that any award of RRH and HP funding will be premised on services being available on a reasonable equitable basis throughout that region. Agencies providing services within a region should coordinate with one another to ensure that their combined application requests do not exceed their regional limit as posted by IFA for the current competition. Prioritization in this regard appears to be a conversation best had with local partners as you work together to determine the best way to approach application submissions for RRH and HP assistance in your region. No change made to the final application.*

11. Simplify the Application for New Applicants:

- The "New Applicants Only" section is helpful but could be streamlined to focus on readiness, partnerships, and projected outcomes rather than duplicating multiple sections of the main application.

*Response: The “New Applicants Only” section of the application has been in place for several years, providing a potential path to funding for a new applicant that has never received an Iowa Statewide ESG or SAF grant award and does not have a qualifying data report to submit for the “Performance” section of the application. IFA has found these questions to be an effective way for application reviewers to evaluate the New Applicant’s needs analysis, administrative capacity, level of community support, partnerships, performance goals, and overall readiness to proceed despite not having past performance data available to submit as part of their application. No change made to the final application.*