



**To:** Gatekeepers  
**From:** Homeless Services Section Staff  
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**Please distribute to:**  Homeless Services Program Staff  Rental Assistance Program Staff

**Category:** Program Informational

**Update For: ESG and HTBA Program Clarity on Asset Verification**

**Message:** It has come to our attention that there is confusion around our ESG & HTBA manual information related to the requirement to verify income from assets. Both manuals include a Client File Information/Checklist that identifies that client files must include verification of income and assets.

[24 CFR 5.609](#) identifies income inclusion and exclusions and states that income verification must include any income generated from assets. This does not require that we verify the asset itself but that we verify whether or not any income was derived from an asset. This is very similar to the verification of any other type of income such as wages (earned income) and any unearned income such as welfare assistance payments, interest or dividends, social security, child support, alimony payments, etc.

OHCS is clarifying that subgrantees of ESG and HTBA do not need to verify actual assets, but must verify the income derived from assets. A future update for the manuals will provide this information; however, for clarity in both the ESG and HTBA Manual Versions 07/01/20 and 07/01/23, please follow the guidance in this program update as it supersedes the information identified in the Client File Information/Checklist section of these manuals.

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