

HOUSE IDAHO COLLABORATIVE



WRITTEN STANDARDS

House Idaho Collaborative Governing Documents

WRITTEN STANDARDS

HIC Regional Map

Regions		Counties
REGION 1		Benewah - Bonner Boundary - Kootenai Shoshone
REGION 2		Clearwater Idaho - Latah Lewis - Nez Perce
REGION 3		Adams - Boise - Canyon Elmore - Gem - Owyhee Payette - Valley - Washington
REGION 4		Blaine - Camas - Cassia Gooding - Jerome - Lincoln Minidoka - Twin Falls
REGION 5		Bingham - Power - Oneida Bannock - Caribou Bear Lake - Franklin
REGION 6		Bonneville - Butte - Clark Custer - Fremont - Jefferson Lemhi - Madison - Teton
REGION 7	 	Ada

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1. Introduction

Idaho Housing and Finance Association acts as the Collaborative Applicant and recipient of grant funds for the Idaho Balance of State Continuum of Care, otherwise known as the “House Idaho Collaborative”, which has developed the following standards for providing assistance with Continuum of Care (CoC) and Emergency Solutions Grant (ESG) funds. For purposes of consistency within these Written Standards, please note the following references:

- The Idaho Balance of State CoC, its board, or any known form of its governance will hereinafter be referred to as the House Idaho Collaborative (**HIC**).
- Idaho Housing and Finance Association, who acts as a Unified Funding Agency for the Balance of State CoC, and as the collaborative applicant, will hereinafter be referred to as the “**recipient**”.
- Agencies or organizations that receive program funding directly from the recipient will hereinafter be referred to as the “**subrecipient**”.
- References to the CoC or ESG programs regarding funding, regulations, instructions, or policies concerning them will hereinafter be referred to by their programmatic names “**CoC**” or “**ESG**”.

The HIC is responsible for coordinating and implementing a crisis response system to meet the needs of populations and subpopulations experiencing homelessness within the geographic area, consisting of Idaho’s regions 1-6. The CoC Regulations, the ESG Rules and Regulations, and the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act all require the HIC, in consultation with the recipients of ESG program funds within the geographic area, to have standards, which govern the provision of assistance to individuals and families. These standards provide guidance to locally funded organizations (hereinafter “subrecipients”) in delivering CoC and ESG assistance.

These standards are not intended to be used in lieu of or in place of the Interim Regulations for the HEARTH Act; rather, they are intended to establish and clarify local decisions regarding program administration. All US Department of Housing and Urban Development (HUD)-funded subrecipients must follow the Interim Regulations for both CoC and ESG in their entirety, as well as these Written Standards.

Each CoC and ESG funded subrecipient shall comply with the minimum standards established by the HIC; although, each subrecipient may decide to set standards on their provision of CoC and ESG that exceed these minimum requirements, as long as those standards do not conflict with the HEARTH Act, other federal laws and regulations, or these Written Standards.

These Written Standards have been established to ensure that persons experiencing homelessness who enter programs throughout the HIC’s geographic area will be given similar information and support to access and maintain permanent housing. These Written Standards are based upon federal and local strategies, designed to support community efforts to assist those experiencing, or at risk of experiencing, homelessness. Subrecipient compliance with these Written Standards ensures fidelity to the values, rules, and principles listed herein, that contribute to an effective homelessness response system.

The majority of these standards are based on the CoC, ESG, and/or the HEARTH Interim Rules. There are some additional standards that have been established by the HIC which will assist projects to meet and exceed performance outcomes, equipping the HIC to reach the goal of ending homelessness.

2. System Overview

The CoC program is authorized by the HEARTH Act, which was enacted into law on May 20, 2009. The HEARTH Act consolidates three of the separate homelessness assistance programs administered by HUD under the McKinney-Vento Homeless Assistance Act into a single grant program. The HEARTH Act also codifies into law the CoC planning process.

Idaho's HIC is challenged by an environment with numerous barriers to housing, deficient resources and funding, absence of available housing stock, divided systems, lack of public transportation, and the vast and rural geographic area which exists within the HIC. The resources, systems, and partnerships that do exist must be maximized and used to their fullest potential, and collaboration and coordination must be fostered and advanced to successfully reduce homelessness.

2.1 Roles and Responsibilities

Subrecipients must comply with all HUD requirements related to the funding of the grant or these standards including, without limitation, the Regulations, 2 CFR 200 - Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

Subrecipients must comply with all sections and attachments of their individual project grant agreement(s) and agree to any penalties outlined in the agreement(s) for not complying with policies of the recipient or HUD.

Subrecipients must agree to refer participants to mainstream resources, as applicable.

Subrecipients are required to use the Coordinated Entry system as approved by the HIC.

Subrecipients should include in their program agreements, which are signed by participants, an acknowledgment that, should a subrecipient discontinue operating a project within the HIC's geographic area, all information regarding housing and services provided by CoC or ESG funding will be transferred to the recipient, or an identified and approved subrecipient. This will ensure timely and appropriate continuation of housing and services as covered within the HIC's geographic area and compliance with program recordkeeping requirements.

Subrecipients must agree to participate in Regional Homeless Coalition meetings and shall coordinate its activities with the activities of other private, city, county, regional, state, and federal agencies having allied programs in order to improve services, eliminate duplication of services, cultivate collaboration, and enhance the CoC and ESG programs in each region of the state. Attendance and participation will be verified and may affect funding awards.

Subrecipients must agree to participate in an Annual Point-In-Time (PIT) count, at a date to be determined by HUD, and upon notification from the recipient. Attendance and participation will be verified and may affect funding awards.

Subrecipients must participate in Idaho's Homelessness Management Information System (HMIS), Community Management Information System (CMIS), or utilize a comparable database when collecting and reporting all HUD-required universal data elements and program specific data elements, as well as adhere to HIC-imposed data collection requirements. These Written Standards authorize the CoC and ESG recipient to administer a comparable database, which is the CMIS, for subrecipients prohibited from participating in HMIS. Subrecipients may be required to participate in a singular statewide comparable database that is considerate of all security and privacy measures necessary for vulnerable populations, such as survivors of violence or domestic abuse. Rules for Domestic Violence (DV) shelters and service providers, as authorized by the Violence Against Women Act (VAWA) and the Family Violence Prevention and Services Act (FVPSA) and any other federal, state, or local privacy or security law, take precedence over the privacy standards and data entry requirements of CMIS or any other comparable database.

2.2 Housing Focused Approach

"Housing Focused" is a local approach to ending homelessness, which provides a participant-driven strategy and immediate access to housing without requiring participation in treatment or other service participation requirements. After settling into housing, participants are offered a range of supportive services that focus primarily on helping them maintain their housing.

All permanent housing projects should strive to have low barriers to program admission and serve individuals and families without consideration of past rental, credit, or financial history.

A Housing Focused approach has also evolved to encompass a community-level orientation to end homelessness in which many barriers to housing entry are removed and efforts are in place to prioritize those whom homelessness presents the greatest risk to health and safety. Subrecipients are encouraged to adopt and institute additional Housing Focused practices when practicable.

3. Program Eligibility Requirements

3.1 All Programs

3.1.1 Homeless Definitions: Categories for Defining Homeless

3.1.1.1 Category 1 - Literally Homeless

An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- An individual or family with a primary night-time residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground; or
- An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
- An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Documentation Requirements

- Written observation by the outreach worker; or
- Written referral by another housing or service subrecipient; or
- Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in the shelter; or
- For individuals exiting and institution-one of the forms of evidence above and: discharge paperwork or written/oral referral, or written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited institution.

3.1.1.2 Category 2 - Imminent Risk of Homelessness

An individual or family who will imminently lose their primary nighttime residence, provided that:

- The primary night-time residence will be lost within 14 days of the date of application for homeless assistance; and
- No subsequent residence has been identified; and
- The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing.

Documentation Requirements

- A court order resulting from an eviction action notifying the individual or family that they must leave; or
- For individual and families leaving a hotel or motel-evidence that they lack the financial resources; or
- A documented and verified oral statement; and Certification that no subsequent residence has been identified; and Self-certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing.

3.1.1.3 Category 3 - Homeless under other federal statutes

Not eligible in Idaho. Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

- Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
- Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance; or
- Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which

include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.

Documentation Requirements

- Certification by the non-profit or state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute; and
- Certification of not PH in the last 60 days; and
- Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the past 60 days; and
- Documentation of special needs or 2 or more barriers.

3.1.1.4 Category 4 - Fleeing/attempting to flee domestic violence:

Any individual or family who meets the following criteria:

- Is experiencing trauma or a lack of safety related to, or fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized; and
- Has no other safe residence; and
- Lacks the resources to obtain other safe permanent housing.

Documentation Requirements

- For Victim Service Subrecipients - An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack the resources. Statement must be documented by a self-certification or a certification by the intake worker.
- For Non-Victim Service Subrecipients
 - o Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and
 - o Certification by the individual or head of household that no subsequent residence has been identified; and
 - o Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

3.1.1.5 Definition of Chronically Homeless

For all dedicated/prioritized chronically homeless units, participants must meet the chronically homeless definition. Chronically homeless means:

- A "homeless individual with a disability," as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:

- Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
- Has been homeless and living as such continuously for at least 12 months or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights. Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility; or
- An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days before entering that facility; or
- A family with an adult head of household (or if there is no adult in the family, a minor head of household) including a family whose composition has fluctuated while the head of household has been homeless.

3.1.2 Considerations for Special Populations

3.1.2.1 Veterans

To support the federal goal to end veteran homelessness, veterans will be prioritized through the Coordinated Entry system. The system will encourage linkages to Veteran Administration services when possible and appropriate, while establishing a CoC resource preference for veterans should such resources be necessary.

3.1.2.2 Youth

Subrecipients which provide services to unaccompanied youth and young adults should be able to provide safe and high-quality housing and supportive services (scattered-site independent apartments, host homes, and shared housing) to youth and young adults experiencing homelessness that involve integrated affordable housing, intensive strength-based case management, self-sufficiency services, trauma-informed care, and positive youth development approaches. Unaccompanied youth and young adults presenting to the HIC for housing and/or services will be connected with Idaho Department of Health and Welfare foster care resources and Runaway and Homeless Youth providers.

3.1.2.2.1 Youth Eligibility

“Homeless Youth” includes all homeless persons aged 24 or younger and without a head of household older than 24. This group does not include youth living with family members older than 24. This population includes youth in foster care, juvenile justice, and health care systems.

HUD’s homelessness assistance programs do not prohibit subrecipients from providing assistance to youth who meet the criteria in HUD’s definition of homelessness. However, subrecipients serving unaccompanied children under the age of 18 should be aware that there may be state and local laws or regulations that can affect program design or eligibility for these youth.

Using the flexibility of the Rapid Rehousing model, programs can address challenges that are unique to serving youth by:

- Rapidly moving youth into permanent housing; and
- Offering short to medium term financial assistance; and
- Providing developmentally appropriate case management and services.

3.1.3 Subrecipient Internal Controls - 2 CFR § 200.303

Internal controls should provide reasonable assurance that subrecipients are managing their federal awards in compliance with federal statutes, regulations, and the terms and conditions unique to each grant award. One internal control that is important to financial management is the requirement that multiple people with differing roles review each financial transaction. They cross-check one another to make sure that budgets, costs, records, and reports all match up. In this way, internal controls help make sure that funds are being used appropriately and that no one person can defraud an organization.

If segregation of duties is not practical within an operational process because of limited personnel or other factors, subrecipients will be required to design alternative control activities to address the risk of fraud, waste, or abuse in operational processes. Smaller agencies face greater challenges in segregating duties because of their concentration of responsibilities and authorities in the organizational structure. Management, however, can respond to this increased risk through the design of an internal control system, such as by adding additional levels of review for key operational processes, reviewing randomly selected transactions and their supporting documentation, taking periodic asset counts, or checking supervisor reconciliations.

Additionally, according to 2 CFR § 200.303 subrecipients must:

- Establish, document, and maintain effective internal control over the Federal award that provides reasonable assurance that the subrecipient is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. These internal controls should align with the guidance in “Standards for Internal Control in the Federal Government” issued by the Comptroller General of the United States or the “Internal Control-Integrated Framework” issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).
- Comply with the U.S. Constitution, Federal statutes, regulations, and the terms and conditions of the Federal award.
- The recipient should evaluate and monitor the subrecipient's compliance with statutes, regulations, and the terms and conditions of Federal awards.
- Take prompt action when instances of noncompliance are identified.
- Take reasonable cybersecurity and other measures to safeguard information including protected personally identifiable information (PII) and other types of information. This also includes information the Federal agency or pass-through entity designates as sensitive or other information the recipient or subrecipient considers sensitive and is consistent with applicable Federal, State, local, and tribal laws regarding privacy and responsibility over confidentiality.

3.2 Emergency Solutions Grant Program - 24 CFR § 576

History of the Program

The Emergency Shelter Grants program was established by the Homeless Housing Act of 1986 in response to the growing issue of homelessness in the United States. In 1987, the program was incorporated into Title IV of the Stewart B. McKinney Homeless Assistance Act (42 U.S.C. Sec. 11371-11378), now known as the McKinney-Vento Homeless Assistance Act. HUD awards these funds to the State of Idaho, and the Idaho Constitution has designated Idaho Housing and Finance Association to administer the funds on behalf of the State and act as the recipient of ESG funding.

The Emergency Solutions Grant (ESG) program was created to replace the Emergency Shelter Grants program when the HEARTH Act was signed into law on May 20, 2009. The HEARTH Act amended and reauthorized the McKinney-Vento Homeless Assistance Act and included major revisions to the Emergency Shelter Grant Program.

The ESG program is designed to support sheltered and unsheltered homeless persons, as well as those at risk of homelessness, by providing the services necessary to help those persons to regain stability quickly in permanent housing after experiencing a housing crisis and/or homelessness. The change in program name reflects the change in focus from addressing the needs of the homeless in emergency or transitional shelters to assisting people to regain stability in permanent housing.

During each program year, the HIC will make determinations on ESG funding levels for subrecipients and new subrecipients. The recipient will also train all new subrecipients on the ESG program yearly. Subrecipients are strongly encouraged to read HUD's guidance and ESG Program resources at <https://www.hudexchange.info/programs/esg/guides/#tools-and-guidance>.

ESG General Provisions - 24 CFR § 576.100

ESG funds may be used for the following program components: street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, HMIS/CMIS/Comparable Database, as well as administrative activities. The program components and the eligible activities that may be funded under ESG are outlined in 24 CFR § 576.101 through 24 CFR § 576.107, and eligible administrative activities are outlined in 24 CFR § 576.108.

The total amount of ESG fiscal year funds that may be used for street outreach and/or emergency shelter activities cannot exceed the greater of:

- 60 percent of total ESG funding; or
- The amount grant funds committed for homeless assistance activities.

3.2.1 Street Outreach Component - 24 CFR § 576.101

The Street Outreach component covers essential services related to reaching out to unsheltered homeless individuals and families, connecting them with emergency shelter, housing, or critical services, and providing them with urgent, non-facility-based care. Eligible costs include engagement, case management, emergency health and mental health services, transportation, and services for special populations.

3.2.1.1 Street Outreach Eligible Activities

3.2.1.1.1 Engagement - 24 CFR § 576.101(a)(1)

The costs of activities to locate, identify, and build relationships with unsheltered homeless people and engage them for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs. These activities consist of making an initial assessment of needs and eligibility; providing crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; and actively connecting and providing information and referrals to programs targeted to homeless people and mainstream social services and housing programs, including emergency shelter, transitional housing, community-based services, permanent supportive housing, and rapid re-housing programs. Eligible costs include the cell phone costs of outreach workers during the performance of these activities.

3.2.1.1.2 Case Management - 24 CFR § 576.101(a)(2)

The cost of assessing housing and service needs, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant. Eligible services and activities are as follows: using the centralized or coordinated assessment system; conducting the initial evaluation, including verifying and documenting eligibility; counseling; developing, securing and coordinating services; obtaining Federal, State, and local benefits; monitoring and evaluating program participant progress; providing information and referrals to other providers; and developing an individualized housing and service plan, including planning a path to permanent housing stability.

3.2.1.1.3 Emergency Health Services - 24 CFR § 576.101(a)(3)

Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals operating in community-based settings, including streets, parks, and other places where unsheltered homeless people are living. ESG funds may be used only for these services to the extent that other appropriate health services are inaccessible or unavailable within the area. Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate emergency medical treatment; and providing medication and follow-up services.

3.2.1.1.4 Emergency Mental Health Services - 24 CFR § 576.101(a)(4)

Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions operating in community-based settings, including streets, parks, and other places where unsheltered people are living. ESG funds may be used only for these services to the extent that other appropriate mental health services are inaccessible or unavailable within the community. Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances. Eligible treatment consists of crisis interventions, the prescription of psychotropic medications, explanation about the use and management of medications, and combinations of therapeutic approaches to address multiple problems.

3.2.1.1.5 Transportation - 24 CFR § 576.101(a)(5)

The transportation costs of travel by outreach workers, social workers, medical professionals, or other service providers are eligible, provided that this travel takes place during the provision of services eligible under this section. The costs of transporting unsheltered people to emergency shelters or other service facilities are also eligible. These costs include:

- The cost of a program participant's travel on public transportation.
- If service workers use their own vehicles, mileage allowance for service workers to visit program participants.
- The cost of purchasing or leasing a vehicle for the recipient or subrecipient in which staff transports program participants and/or staff serving program participants, and the cost of gas, insurance, taxes, and maintenance for the vehicle.
- The travel costs of recipient or subrecipient staff to accompany or assist program participants to use public transportation.

3.2.1.1.6 Services for Special Populations - 24 CFR § 576.101(a)(6)

ESG funds may be used to provide services for homeless youth, survivor services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under this section. The term "survivor" services mean services that assist program participants who are survivors of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking.

3.2.1.3 Street Outreach Eligible Participants

Participants must meet one of the following:

- Category 1: Literally Homeless
- Category 4: Fleeing/attempting to flee domestic violence

For additional details related to the HUD definition of homelessness and applicability to each program, see Section 3.1.1.

3.2.2 Emergency Shelter Component - 24 CFR § 576.102

The role of an emergency shelter is to provide a safe place for persons who have been unable to resolve a housing crisis and have no alternatives for temporary housing. The goal of the HIC is to assist residents in moving from an emergency shelter into stable housing as quickly as possible.

3.2.2.1 Emergency Shelter Eligible Activities

3.2.2.1.1 Essential Services - 24 CFR § 576.102(a)(1)

ESG funds may be used to provide essential services to individuals and families, and operating emergency shelters.

Case Management - 24 CFR § 576.102(a)(1)(i)

- The cost of assessing, arranging, coordinating and monitoring the delivery of individualized services to meet the needs of the program participant is eligible

- Using the centralized or coordinated assessment system as required under §576.400d
- Conducting the initial evaluation required under §576.401(a), including verifying and documenting eligibility
- Developing, securing, and coordinating services and obtaining Federal, State, and local benefits
- Monitoring and evaluating program participant progress
- Providing information and referrals to other providers
- Providing ongoing risk assessment and safety planning with survivors of domestic violence, dating violence, sexual assault, and stalking
- Developing an individualized housing and service plan, including planning a path to permanent housing stability.

Childcare - 24 CFR § 576.102(a)(1)(ii)

- The costs of childcare for program participants, including providing meals and snacks, and comprehensive and coordinated sets of appropriate developmental activities, are eligible. The children must be under the age of 13, unless they are disabled. Disabled children must be under the age of 18. The childcare center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.

Education Services - 24 CFR § 576.102(a)(1)(iii)

- When necessary for the program participant to obtain and maintain housing, the costs of improving knowledge, and basic educational skills are eligible. Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED). Eligible services or activities include screening, assessment, and testing; individual or group instruction; tutoring; provision of books, supplies, and instructional material; counseling; and referral to community resources.

Employment Assistance and Job Training - 24 CFR § 576.102(a)(1)(iv)

- The costs of employment assistance and job training programs are eligible, including classroom, online, and/or computer instruction; on-the-job instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential.
- Cost of providing reasonable stipends to program participants in employment assistance and job training programs.
- Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.
- Services that assist individuals in securing employment include employment screening, assessment, or testing; structured job skills and job-seeking skills; special training and tutoring, including literacy training and prevocational training; books and instructional material; counseling or job coaching; and referral to community resources.

Outpatient Health Services - 24 CFR § 576.102(a)(1)(v)

- Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals. Funds may be used only for these services

to the extent that other appropriate health services are unavailable within the community.

- Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate medical treatment, preventative medical care, and health maintenance services, including emergency medical services; providing medication and follow-up services; and providing preventative and non-cosmetic dental care.

Legal Services - 24 CFR § 576.102(a)(1)(vi)

- Eligible costs are the hourly fees for legal advice and representation by attorneys licensed and in good standing with the bar association of the State in which the services are provided, and by person(s) under the supervision of the licensed attorney, regarding matters that interfere with the program participant's ability to obtain and retain housing. ESG funds may be used only for these services to the extent that other appropriate legal services are unavailable or inaccessible within the community.
- Eligible subject matters are child support, guardianship, paternity, emancipation, and legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking, appeal of veterans and public benefit claim denials, and the resolution of outstanding criminal warrants.
- Component services or activities may include client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling.
- Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the subrecipient's employees' salaries and other costs necessary to perform the services.
- Legal services for immigration and citizenship matters and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements are ineligible costs.

Life Skills Training - 24 CFR § 576.102(a)(1)(vii)

- The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance use, and homelessness are eligible costs. These services must be necessary to assist the program participant to function independently in the community. Eligible costs of life skills training are budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public transportation, and parenting.

Mental Health Services - 24 CFR § 576.102(a)(1)(viii)

- Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions. ESG funds may only be used for these services to the extent that other appropriate mental health services are unavailable or inaccessible in the community.
- Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the

problem or improved individual or family functioning circumstances. Problem areas may include family and marital relationships, parent-child problems, or symptom management.

- Eligible treatment consists of crisis interventions; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.

Substance Abuse Treatment Services - 24 CFR § 576.102(a)(1)(ix)

- Eligible substance abuse treatment services are designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors and are provided by licensed or certified professionals. ESG funds may only be used for these services to the extent that other appropriate substance abuse services are unavailable or inaccessible in the community.
- Eligible treatment consists of client intake and assessment, and outpatient treatment for up to 30 days. Group and individual counseling and drug testing are eligible costs. Inpatient detoxification and other inpatient drug or alcohol treatment are not eligible costs.

Transportation - 24 CFR § 576.102(a)(1)(x)

- Eligible costs consist of transportation costs of a program participant's travel to and from medical care, employment, childcare, or other eligible essential services facilities.
- The cost of a program participant's travel on public transportation.
- If services workers use their own vehicles, mileage allowance for service workers to visit program participants.
- The cost of purchasing or leasing a vehicle for the recipient or subrecipient in which staff transports program participants and/or staff serving program participants, and the cost of gas, insurance, taxes, and maintenance for the vehicle.
- Gas vouchers are no longer eligible to be reimbursed, i.e.: this includes gas cards, filling up gas tanks, etc.
- The travel costs of recipient or subrecipient staff to accompany or assist program participants to use public transportation.

3.2.2.1.2 Operations - 24 CFR § 576.102(a)(2)

Eligible costs are maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter. Where no appropriate emergency shelter is available for a homeless family or individual, eligible costs may also include a hotel or motel voucher for that family or individual.

3.2.2.2 Emergency Shelter Eligible Participants

Participants must meet one of the following:

- Category 1: Literally Homeless
- Category 2: Imminent Risk of Homelessness
- Category 4: Fleeing/Attempting to Flee Domestic Violence

For additional details related to the HUD definition of homelessness and applicability to each program, see Section 3.1.1.

3.2.3 Homelessness Prevention Component - 24 CFR § 576.103

Homelessness Prevention (HP) assistance consists of financial assistance and supportive services to assist households in maintaining stable housing and avoid becoming homeless. HP may assist a household to recover from a temporary financial setback that caused late or overdue payments for rent or utilities and may provide short-term stability while the household recovers.

3.2.3.1 HP Eligible Activities

3.2.3.1.1 HP Tenant-Based Rental Assistance (TBRA) - 24 CFR § 576.106

Current rent owed as shown on lease. Subrecipients may provide a program participant with up to 24 months of rental assistance during any 3-year period. This assistance may be short-term up to 3 months, or medium-term of 3-24 months. Payment of rental arrears consists of a one-time payment for up to 6 months' rent including any late fees.

3.2.3.1.2 HP Financial Assistance - 24 CFR § 576.105(a)

HP funds may be used to pay housing owners, utility companies, and other third parties. Eligible costs include rental application fees, security deposits (no more than 2 months' rent), last month's rent (cannot exceed one month's rent and included in total rental assistance not to exceed 24 months in a 3-year period), utility deposits, utility payments (gas, electric, water, and sewage up to 24 months per participant, per service, including 6 months of arrears per service), moving costs (temporary storage fees up to 3 months, temporary storage fees in arrears are not eligible).

3.2.3.1.3 HP Services - 24 CFR § 576.105(b)

- **Case Management:** Funds may be used to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing. Eligible activities include using the Coordinated Entry system, conducting the initial evaluation required, counseling, developing, securing, and coordinating services and obtaining Federal, State, and local benefits, monitoring and evaluating program participant progress, providing information and referrals to other providers, developing an individualized housing and service plan, including planning a path to permanent housing stability, and conducting re-evaluations. Cannot exceed 30 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing.
- **Housing Search and Placement:** Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing. This includes assessment of housing barriers, needs, and preferences; development of an action plan for locating housing; housing search; outreach to and negotiation with owners; and assistance with submitting rental applications and understanding leases and assessment of housing for compliance with ESG requirements for habitability, lead-based paint, and rent reasonableness.

3.2.3.2 HP Eligible Participants - 24 CFR § 576.2

Participants must meet one of the following:

- Category 2: Imminent Risk of Homelessness
- Category 4: Fleeing/Attempting to Flee Domestic Violence

For additional details related to the HUD definition of homelessness and applicability to each program, see Section 3.1.1.

Additionally, household income must be at or below 30% AMI. Minimum standards for determination of an individual or family's annual income consist of calculating income in compliance with 24 CFR § 5.609.

In verifying income, ESG-funded subrecipients are required to obtain third-party verification whenever possible. Self-certification or verification is to be accepted only when all efforts to obtain third-party verification are unsuccessful and attempts to obtain third-party verification have been documented. Third-party verification of income may include a letter or employment verification form signed by the employer, paystubs, or information obtained through the Department of Labor.

HUD Income Limits Site: https://www.huduser.gov/portal/datasets/il.html#2022_data

3.2.4 Rapid Rehousing Component - 24 CFR § 576.104

Rapid Rehousing (RRH) assistance consists of financial assistance and supportive services to assist households with accessing stable housing as quickly as possible. RRH may assist a household in recovering from a temporary financial setback that caused homelessness, or, for households with more severe challenges, it may be a bridge to provide stability while the household increases income or is approved for affordable housing or permanent supportive housing.

3.2.4.1 RRH Eligible Activities

3.2.4.1.1 Tenant-Based Rental Assistance (TBRA) - 24 CFR § 576.106

Current rent owed as shown on lease. Subrecipients may provide a program participant with up to 24 months of rental assistance during any 3-year period. This assistance may be short-term up to 3 months, or medium-term of 3-24 months. Payment of rental arrears consists of a one-time payment for up to 6 months' rent including any late fees.

3.2.4.1.2 Financial Assistance - 24 CFR § 576.105(a)

RRH funds may be used to pay housing owners, utility companies, and other third parties. Eligible costs include rental application fees, security deposits (no more than 2 months' rent), last month's rent (cannot exceed one month's rent and included in total rental assistance not to exceed 24 months in a 3-year period), utility deposits, utility payments (gas, electric, water, and sewage up to 24 months per participant, per service, including 6 months of arrears per service), moving costs (temporary storage fees up to 3 months, temporary storage fees in arrears are not eligible).

3.2.4.1.3 Services - 24 CFR § 576.105(b)

- Case Management: Funds may be used to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a

program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing. Eligible activities include using the Coordinated Entry system, conducting the initial evaluation required, counseling, developing, securing, and coordinating services and obtaining Federal, State, and local benefits, monitoring and evaluating program participant progress, providing information and referrals to other providers, developing an individualized housing and service plan, including planning a path to permanent housing stability, and conducting re-evaluations. Cannot exceed 30 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing.

- Housing Search and Placement: Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing. This includes assessment of housing barriers, needs, and preferences, development of an action plan for locating housing, housing search, outreach to and negotiation with owners, assistance with submitting rental applications and understanding leases and assessment of housing for compliance with ESG requirements for habitability, lead-based paint, and rent reasonableness.

3.2.4.1.4 RRH Population-specific requirements

- Homeless persons who are in shelters or living in places not meant for human habitation, meeting the criteria for HUD's Category 1 definition of homelessness, or persons fleeing or attempting to flee domestic violence, meeting the criteria for HUD's Category 4 definition of homelessness
- Housing history, education level, and employment history will also be considered when choice of transitional housing and rapid rehousing are both available
- Individuals who have repeated homeless episodes or the current homeless episode is more than 3 months
- Household incomes at or below 30% of area median income (AMI)

Minimum standards for determination of an individual or family's annual income consist of calculating income in compliance with 24 CFR § 5.609.

In verifying income, ESG-funded subrecipients are required to obtain third-party verification whenever possible. Self-certification or verification is to be accepted only when all efforts to obtain third-party verification are unsuccessful and attempts to obtain third-party verification have been documented. Third-party verification of income may include a letter or employment verification form signed by the employer, paystubs, or information obtained through the Department of Labor.

HUD Income Limits Site: https://www.huduser.gov/portal/datasets/il.html#2022_data

3.2.4.1.5 RRH Payment Requirements

Prior to payment of rental assistance, the rental unit must pass the necessary inspections (HQS/NSPIRE) and have an executed lease. Leases should be for the term of one year, but if extenuating circumstances exist (i.e., market conditions, landlord standards, unit scarcity), leases can be for a term of less than one year if mutually agreed upon by the landlord and participant. The federal portion of the rent payment for the unit must be at or below HUD's published Fair Market Rent for ESG program funding and comply with HUD standards for rent reasonableness (24 CFR § 982.507). The project will pay the full cost of rent and the calculated

utility allowance for participants in full calendar months 1, 2, and 3. If the first month of the lease is partial and prorated, it will not count as month 1. Each month thereafter month 3 assistance will be reassessed. If, based on rent-to-income ratio the participant is not able to pay full rent and utilities in months 4 and later, the participant is eligible to continue receiving rental assistance up to a total of 12 months per enrollment if the participant is adhering to all subrecipient project requirements and actively pursuing employment or mainstream resources for income, has gained employment, or is participating in job training or education.

Length of participation in the project will be determined through agreement between the participants and funded subrecipients. Through monthly case management, these parties will assess barriers to stability, housing stability, income stability, and rent-to-income ratios. When both the participant and subrecipient agree, rental assistance will cease.

If determined necessary, an additional 6 months of case management services may be made available to participants after the eligible months of housing assistance.

The following table identifies rent-to-income ranges and corresponding percentages of rent and utility allowances to be paid by each RRH household, which is the actual rent and utilities, if there are any. The length of rental assistance should be determined by the participant's need, as determined by monthly assessments, and should not be longer than 12 months per episode.

<u>Rent-to-Income Ratio Range</u>	<u>Percentage of rent/utilities paid by household</u>
50% or greater	0%
43-49%	25%
37-42%	50%
30-36%	75%
Less than 30%	100%

A household can only be eligible for RRH assistance 2 times in 3 years, and total rental assistance cannot exceed 24 months in that 3-year period.

A vacancy payment can pay rent for a maximum of 30 days from the end of the month in which the unit was vacated.

If the cost of any eligible utility (excluding telephone, cable television, or internet) for a residential rental unit is paid directly by the tenants and not by or through the owner of the rental, the gross rent for that unit includes an applicable utility allowance. IHFA branch offices or a local Public Housing Authority (PHA) may be contacted to assist with the generation of a utility allowance to be used in completing the rent calculation. The utility provider must be indicated if there are multiple options in the city in which the unit is located. The following information should be sent to the local IHFA branch office or PHA to obtain the analysis:

- City where the rental unit is located
- Bedroom size
- Maximum/minimum weatherization
- Heat- wood stove, propane, gas, or electric
- Heat Source- forced air, baseboard, pressurized/ceiling, fan forced

Written Standards

- Stove- propane, gas, or electric
- Water heater- propane, gas, or electric
- Water- well or city service
- Sewer- septic tank or city service
- Trash
- Refrigerator- whether provided by tenant or landlord
- Stove- whether provided by tenant or landlord

3.2.4.2 RRH Eligible Participants - 24 CFR § 576.2

Participants must meet one of the following:

- Category 1: Literally Homeless
- Category 4: Fleeing/Attempting to Flee Domestic Violence

For additional details related to the HUD definition of homelessness and applicability to each program, see Section 3.1.1.

3.2.5 General ESG Components

The following components of the ESG program can be applied to all grant types (Street Outreach, Emergency Shelter, HP, RRH). Subrecipients requesting these components should apply for them during the annual ESG competition, and post-award, subrecipients should consult their project budget included with their grant agreement to verify their inclusion.

3.2.5.1 Data Collection - 24 CFR § 576.107

- Purchasing or leasing computer hardware, software and/or software licenses, leasing office space, equipment (telephones, fax machines, furniture), obtaining technical support, and utilities for HMIS/CMIS or comparable database activities. In addition, salaries of data collection staff, operating costs, and duties as required to operate an HMIS/CMIS or comparable database, trainings related to the use of HMIS/CMIS/comparable database, and reporting to the recipient on HMIS/CMIS/comparable database are eligible costs. - 24 CFR § 576.107(a)(1)
- If the subrecipient is a victim services provider or a legal services provider, it may use ESG funds to establish and operate a comparable database that collects client-level data over time (i.e., longitudinal data) and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must not be entered directly into or provided to HMIS. - 24 CFR § 576.107(a)(3)
- The recipient will automatically set aside and collect up to 5% of the total ESG award for its own administration of the HMIS/CMIS.

3.2.5.2 Administrative Costs - 24 CFR § 576.108

The recipient may use up to 7.5% of the total ESG award for the payment of administrative costs related to ESG activities, and the recipient will split administrative costs with subrecipients. Subrecipients will receive up to a cumulative 4% of the total ESG program admin, and the recipient will receive up to 3.5%. This does not include staff and overhead costs directly related to carrying out activities eligible under 24 CFR § 576.102 - 24 CFR § 576.107 as listed, because those costs are eligible as part of those activities. Eligible administrative costs include:

General management, oversight and coordination - 24 CFR § 576.108(a)(1)

Costs of overall program management, coordination, monitoring, and evaluation.

- Salaries, wages, and related costs of the staff of subrecipients, or other staff engaged in program administration. All salaries must be documented utilizing an hourly rate form provided by the recipient.
- Other non-wage based administrative eligible activities include preparing program budgets and schedules, and amendments to those budgets and schedules; developing systems for assuring compliance with program requirements; developing interagency agreements and agreements with subrecipients and contractors to carry out program activities; monitoring program activities for progress and compliance with program requirements; preparing reports and other documents directly related to the program for submission to HUD; coordinating the resolution of audit and monitoring findings; evaluating program results against stated objectives; and managing or supervising administrative staff.

3.2.6 ESG Matching Requirement - 24 CFR § 576.201

Under ESG, subrecipients agree to match 100% of funds available under the Grant Agreement with funding from other sources. Subrecipients may use funds from other Federal programs as match for ESG, unless doing so would violate a specific statutory prohibition or the subrecipient counts ESG funds as match for that program (24 CFR § 576.201(b)(2)). All match funds must be spent on ESG-eligible activities within the period of the Grant Agreement. In addition, all match contributions must be submitted with draw documentation and be equal to or greater than the 100% match requirement for ESG by the end of the grant period. See section 4.2.7 for eligible forms of match under the ESG program.

3.2.7 Inspections on ESG Funded Shelters or Units - 24 CFR § 576.403

The ESG program Interim Rule does not specify who must conduct ESG minimum standards for emergency shelter or habitability inspections, nor prohibit staff from conducting inspections, nor prescribe how staff should be trained to conduct these inspections. The recipient will determine the best way to meet this requirement in terms of both staffing and training.

Subrecipients must establish and maintain sufficient records to enable the recipient to determine whether ESG requirements are being met. The records must include documentation of compliance with minimum standards for emergency shelters in 24 CFR § 576.403, including inspection reports. The recipient may impose additional requirements and/or establish stricter standards.

Additionally, the recipient will be solely responsible for completing ESG shelter inspections. The ESG minimum habitability standards for emergency shelters and permanent housing checklist created by HUD will be used to complete the inspections. Please note that if a shelter fails to meet the minimum standards, ESG funds (under either shelter operations or renovation) may be used to bring it up to the minimum standards. For a blank copy of the inspection report that will be used to conduct these inspections, please contact snap@ihfa.org.

For housing inspections, the recipient will require HQS/NSPIRE and may decide to establish other standards more stringent than the ESG program's minimum habitability standards, or may allow the subrecipient to establish such standards, as long as all HUD-required standards are also met.

3.2.8 ESG References

- Federal Regulations: <https://www.gpo.gov/fdsys/granule/CFR-2012-title24-vol3/CFR-2012-title24-vol3-part576>
- HUD ESG Program Toolkit: <https://www.hudexchange.info/programs/esg/>
- ESG Minimum Habitability Standards for Emergency Shelters and Permanent Housing Checklist: <https://files.hudexchange.info/resources/documents/ESG-Emergency-Shelter-and-Permanent-Housing-Standards-Checklists.docx>

3.3 Continuum of Care Program - 24 CFR § 578

History of the Program

The Continuum of Care (CoC) program was introduced by HUD in the mid-1990's. It was codified into law by Congress through the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act signed into law (Public Law 111-22) on May 20, 2009, providing congressional authorization of the CoC program. HUD published the CoC program interim rule on July 31, 2012. This interim rule, which became effective August 30, 2012, establishes the requirements for the CoC program, including requirements for applying for, and administering, grant funds as well as the regulatory implementation of the CoC and its responsibilities. The CoC program consolidated the following Homeless Assistance programs: the Shelter Plus Care Program, the Supportive Housing Program, and the Section 8 Moderate Rehabilitation Single Room Occupancy Program. Additionally, the CoC program interim rule incorporates the final Homeless Definitions.

CoC General Provisions - 24 CFR § 578.1

The purpose of the CoC program is to promote the development of supportive housing and supportive services which assist persons experiencing homelessness in transitioning from homelessness to living as independently as possible in safe, decent, affordable, and stable housing. All CoC funding is intended to further the goal of gaining or maintaining permanent housing for eligible homeless persons. The CoC program does this through:

- Promoting communitywide commitment to the goal of ending homelessness; and
- Providing funding for efforts by nonprofits, States, and local governments to quickly rehouse homeless individuals (including unaccompanied youth) and families, while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; and
- Promoting access to and effective utilization of mainstream programs by homeless individuals and families; and
- Optimizing self-sufficiency among individuals and families experiencing homelessness.

3.3.1 Unified Funding Agency - 24 CFR § 578.11

The recipient acts as a Unified Funding Agency (UFA) on behalf of the HIC. To become designated as the UFA, the recipient must be selected by the HIC to apply to HUD to be designated as the UFA. HUD considers the following criteria when deciding whether to designate a recipient as a UFA:

- It meets all the requirements in 24 CFR § 578.7 for the CoC program; and
- The recipient has financial management systems that meet the standards set forth in 2 CFR 200.302; and
- The recipient demonstrates the ability to monitor subrecipients; and

- Such other criteria as HUD may establish by NOFA/NOFO.

HUD-designated UFA's are required to:

- Apply to HUD for funding for all of the projects within the geographic area and enter into a grant agreement with HUD for the entire geographic area.
- Enter into legally binding agreements with subrecipients and receive and distribute funds to subrecipients for all projects within the geographic area.
- Require subrecipients to establish fiscal control and accounting procedures as necessary to assure the proper disbursement of and accounting for federal funds in accordance with the requirements of 2 CFR 200, subpart D.
- Obtain approval of any proposed grant agreement amendments by the HIC before submitting a request for an amendment to HUD.

3.3.1.1 UFA Amendment Process

CoC funds may be reallocated among projects, as long as the resulting shifts total less than 10% of the total grant award from one approved program component to another in a single year of a renewal grant award without a formal grant amendment. Budget changes exceeding 10% of an eligible program component of a grant award cumulatively on an annual basis must be approved first by the HIC, and then by HUD via a formal grant amendment. CoC funds cannot be moved from a CoC Planning grant or a UFA Costs grant, if applicable, nor can funds be moved between a renewal grant and new grant.

3.3.2 Income Determination - 24 CFR § 5.609

Minimum standards for determination of an individual or family's annual income consist of calculating income in compliance with 24 CFR § 5.609. Participants' income must be at or below 50% of AMI. When participants are charged rent, the amount charged must be based on a participant's verified annual income from all sources.

In verifying income, CoC-funded subrecipients are required to obtain third-party verification whenever possible. Self-certification or verification is to be accepted only when all efforts have been made to obtain third-party verification are unsuccessful and attempts to obtain third-party verification have been documented. Third-party verification of income may include a letter or employment verification form signed by the employer, paystubs, or information obtained through the Department of Labor.

3.3.3 Permanent Supportive Housing Component - 24 CFR § 578.37(a)(1)(i)

Permanent Supportive Housing (PSH) is defined as community-based housing without a designated length of stay in which formerly homeless disabled individuals and families live as independently as possible. PSH is permanent housing with indefinite leasing or rental assistance paired with supportive services to assist persons experiencing homelessness who have a disability, or families with an adult member with a disability, achieve housing stability. Certification must be provided by a qualified licensed professional with the ability to diagnose and treat the disabling condition. Under PSH, a program participant must be the tenant on a lease (or sublease) for an initial term of at least one year that is renewable and is terminable only for cause. Leases (or subleases) must be renewable for a minimum term of one month. Any institutionalization for 90 days or less under the CoC program will not be considered a vacancy.

3.3.3.1 PSH Eligible Activities

The following are eligible activities for Permanent Supportive Housing:

3.3.3.1.1 PSH Leasing - 24 CFR § 578.49

Leasing is an eligible cost category under the PSH program component. Funds may be used to lease individual units or all or part of structures. Rents must be reasonable according to local market conditions and, in the case of individual units; the rent paid may not exceed HUD-determined Fair Market Rents. Leasing funds may not be used for units or structures owned by the subrecipient, their parent organization(s), any other related organization(s), or organizations that are members of a partnership where the partnership owns the structure without a HUD-authorized exception. When leasing funds are used to pay rent on units, the lease must be between the subrecipient and the landowner, with a sublease with the program participant. The subrecipient may, but is not required to, charge the program participant rent, consistent with the parameters specified in the Interim Rule.

3.3.3.1.2 PSH Rental Assistance - 24 CFR § 578.51

Rental assistance is an eligible cost category under the PSH program component and may be tenant-based (TBRA), sponsor-based (SBRA), or project-based (PBRA), depending upon the component and project type. SBRA and PBRA are not currently funded by the HIC. Rental assistance may be short-term for up to 3 months; medium-term for 3 to 24 months; or long-term for more than 24 months. The length of assistance depends upon the component type under which the cost is funded. Subrecipients must serve as many program participants as identified in their funding application to HUD. If the TBRA funding amount reserved for the term of the grant exceeds the amount needed to pay actual costs, the excess funds may be used to cover the rental needs of a greater number of program participants.

- TBRA program participants may select any appropriately sized unit within the HIC's geographic area, although recipients or subrecipients may restrict the location under certain circumstances to ensure the availability of appropriate supportive services. Program participants may not retain their rental assistance if they relocate to a unit outside the HIC's geographic area.
- SBRA program participants must reside in housing owned or leased by a sponsor organization and arranged through a contract between the recipient and the sponsor organization. Program participants may not retain their rental assistance if they relocate to a unit outside the project.
- PBRA program participants must reside in housing provided through a contract with the owner of an existing structure whereby the owner agrees to lease subsidized units to program participants. Program participants may not retain their rental assistance if they relocate to a unit outside the project.

When rental assistance funds are used to pay rent on units, the lease must be between the program participant and the landowner. Each program participant, on whose behalf rental assistance payments are made, must pay a contribution toward rent consistent with the requirements of the Interim Rule or the HIC's Written Standards.

Grant funds may be used in an amount not to exceed one month's rent to pay for any damage to the housing unit caused by the action of a participant. This is limited to a one-time cost per participant, incurred at the time a participant exits a housing unit.

Written Standards

If the cost of any utility (other than telephone, cable television, or internet) for a residential rental unit is paid directly by the tenants and not by or through the owner of the rental, the gross rent for that unit includes an applicable utility allowance. IHFA branch offices or a local PHA may be contacted to assist with the generation of a utility allowance to be used in completing the rent calculation.

The following information should be sent to the local IHFA branch office or PHA to obtain the analysis:

- City where the rental unit is located
- Bedroom size
- Maximum/minimum weatherization
- Heat-wood stove, propane, gas, or electric
- Heat Source-forced air, baseboard, pressurized/ceiling, or fan forced
- Stove-propane, gas, or electric
- Water-well or city service
- Sewer-septic tank or city service
- Trash
- Refrigerator-whether provided by tenant or landlord
- Stove-whether provided by tenant or landlord

The utility provider must be indicated if there are multiple options in the city in which the unit is located.

When utilities are not included in the rent, a utility allowance should be subtracted from the tenant rent contribution, or provided as a payment (i.e., a utility reimbursement) where the tenant rent contribution is zero. If the landlord does not include utilities in the participant's rent, the subrecipient must use the PHA's utility allowance schedule to calculate the utility allowance (the reasonable utility consumption amount) for the participant.

When a utility reimbursement is owed to the program participant, this amount would need to be paid in one of the following ways:

1. Pay the program participant directly. The subrecipient may pay the utility reimbursement to the program participant; or
2. Pay the utility company on behalf of the program participant. The subrecipient may pay the utility reimbursement to the utility company on behalf of the program participant. If the subrecipient chooses to do this, the subrecipient must have the permission of the program participant and notify the program participant in writing of the amount paid to the utility company. If actual utility costs are less than the calculated utility reimbursement, the remaining balance after utility costs are paid must be returned to the program participant. If actual utility costs are greater than the reimbursement amount, the program participant would be responsible for paying the outstanding amount.

Note: For option 2, the subrecipient must maintain records of the program participant's permission to pay the utility company directly and of the notifications to the program participant of the amounts paid on their behalf.

The gross rent must not exceed HUD's published Fair Market Rent and the HUD standard for rent reasonableness (24 CFR 982.507). There must be a rental assistance agreement between the landlord and agency and a written lease between tenant and landlord.

3.3.3.2 PSH Supportive Services - 24 CFR § 578.53

Supportive services are eligible costs under the PSH program component. The CoC program interim rule specifies all eligible services and clarifies that any cost not listed in the rule is ineligible. Services must be offered to residents of PSH for the full period of their participation.

Subrecipients are required to perform an annual assessment of the service needs of their program participants and to adjust services accordingly. Eligible costs include the cost of providing services, the salary and benefits of staff providing services, and materials and supplies used in providing services.

3.3.3.3 PSH Operating - 24 CFR § 578.55

Operating costs are eligible under the PSH program component. Funds may be used to pay the day-to-day operating costs in a single structure or individual housing units, including maintenance (such as scheduled replacement of major systems), repair, building security (when CoC Program funds pay for more than 50 percent of the facility by unit or area), electricity, gas, water, furniture, equipment, property insurance, and taxes. These costs may not be combined with rental assistance costs within the same unit or structure.

3.3.3.6 PSH Eligible Participants

Participants must have a disability as defined in Appendix A and must also meet one of the following:

- Category 1: Literally Homeless
- Category 4: Fleeing/Attempting to Flee Domestic Violence

For additional details related to the HUD definition of homelessness and applicability to each program, see Section 3.1.1.

3.3.4 Transitional Housing Component - 24 CFR § 578.37(a)(2)

Transitional Housing (TH) is designed to provide homeless individuals and families with the interim stability and support to successfully move to and maintain permanent housing. Transitional housing may be used to cover the costs of up to 24 months of housing with accompanying supportive services. Program participants must have a lease (or sublease) in place when residing in transitional housing.

3.3.4.1 Eligible Activities

3.3.4.1.1 TH Leasing - 24 CFR § 578.49

Funds may be used to lease individual units or all or part of structures. Rents must be reasonable according to local market conditions and, in the case of individual units, the rent paid may not exceed HUD-determined fair market rents. Leasing funds may not be used for units or structures owned by the subrecipient, their parent organizations(s), any other related organizations, or organizations that are members of a partnership where the partnership owns the structure with a HUD-authorized exception. When leasing funds are used to pay rent on

units, the lease must be between the subrecipient and the landowner, with a sublease with the program participant. The subrecipient may, but is not required to, charge the participant rent.

3.3.4.1.2 TH Rental Assistance - 24 CFR § 578.51

Rental assistance is an eligible cost category under the TH program component and may be tenant-based (TBRA), sponsor-based (SBRA), or project-based (PBRA), depending upon the component and project type. SBRA and PBRA are not currently funded in the HIC. Rental assistance may be short-term for up to 3 months, or medium-term for 3 to 24 months. Recipients must serve as many program participants as identified in their funding application to HUD. If the TBRA funding amount reserved for the term of the grant exceeds the amount needed to pay actual costs, the excess funds may be used to cover the rental needs of a greater number of program participants.

- TBRA program participants may select any appropriately sized unit within the HIC's geographic area, although recipients or subrecipients may restrict the location under certain circumstances to ensure the availability of appropriate supportive services. Program participants may not retain their rental assistance if they relocate to a unit outside the HIC's geographic area.
- SBRA program participants must reside in housing owned or leased by a sponsor organization and arranged through a contract between the recipient and the sponsor organization. Program participants may not retain their rental assistance if they relocate to a unit outside the project.
- PBRA program participants must reside in housing provided through a contract with the owner of an existing structure whereby the owner agrees to lease subsidized units to program participants. Program participants may not retain their rental assistance if they relocate to a unit outside the project.

When rental assistance funds are used to pay rent on units, the lease must be between the program participant and the landowner. Each program participant, on whose behalf rental assistance payments are made, must pay a contribution toward rent consistent with the requirements of the Interim Rule or the HIC's Written Standards.

Grant funds may also be used in an amount not to exceed one month's rent to pay for any damage to the housing unit caused by the action of a participant. This is limited to a one-time cost per participant, incurred at the time a participant exits a housing unit.

If the cost of any utility (other than telephone, cable television, or internet) for a residential rental unit is paid directly by the tenants and not by or through the owner of the rental, the gross rent for that unit includes an applicable utility allowance. IHFA branch offices or a local PHA may be contacted to assist with the generation of a utility allowance to be used in completing the rent calculation.

The following information should be sent to the local IHFA branch office or PHA to obtain the analysis:

- City where the rental unit is located
- Bedroom size
- Maximum/minimum winterization
- Heat-wood stove, propane, gas or electric

Written Standards

- Heat Source-forced air, baseboard, pressurized/ceiling, or fan forced
- Stove-propane, gas, or electric
- Water Heater-propane, gas, or electric
- Water-well or city service
- Sewer-septic tank or city service
- Trash
- Refrigerator-whether provided by tenant or landlord
- Stove-whether provided by tenant or landlord

The utility provider must be indicated if there are multiple options in the city in which the unit is located.

The gross rent must not exceed HUD's published Fair Market Rent and the HUD standard for rent reasonableness (24 CFR § 982.507). There must be a rental assistance agreement between the landlord and agency and a written lease between tenant and landlord.

3.3.4.1.3 TH Supportive Service - 24 CFR § 578.53

Supportive services are eligible costs under the TH program component. The CoC program Interim Rule specifies all eligible services and clarifies that any cost not listed in the rule is ineligible. Services must be offered to residents of TH for the full period of their participation.

Subrecipients are required to perform an annual assessment of the service needs of their program participants and to adjust services accordingly. Eligible costs include the cost of providing services, the salary and benefits of staff providing services, and materials and supplies used in providing services.

3.3.4.1.4 TH Time Limits - 24 CFR § 578.53(b)(3)

Services may be provided to formerly homeless persons for up to six months after their exit from homelessness, including the six months following exit from a transitional housing project.

3.3.4.1.5 TH Operating - 24 CFR § 578.55

Operating costs are eligible under the TH program component. Funds may be used to pay the day-to-day operating costs in a single structure or individual housing units, including maintenance (such as scheduled replacement of major systems), repair, building security (when CoC program funds pay for more than 50 percent of the facility by unit or area), electricity, gas, water, furniture, equipment, property insurance, and taxes. These costs may not be combined with rental assistance costs within the same unit or structure.

3.3.4.2 TH Eligible Participants

Participants must meet one of the following:

- Category 1: Literally Homeless
- Category 2: Imminent Risk of Homelessness
- Category 4: Fleeing/Attempting to Flee Domestic Violence

For additional details related to the HUD definition of homelessness and applicability to each program, see Section 3.1.1.

3.3.5 Rapid Rehousing Component - 24 CFR § 578.37(a)(1)(ii)

Rapid Rehousing (RRH) assistance consists of rent and utility assistance and supportive services to assist households with accessing stable housing as quickly as possible. RRH may assist a household in recovering from a temporary financial setback that caused homelessness, or, for households with more severe challenges, it may be a bridge to provide stability while the household increases income or is approved for affordable housing or permanent supportive housing.

3.3.5.1 Eligible Activities

The following are eligible activities for RRH:

3.3.5.1.1 RRH Rental Assistance - 24 CFR § 578.51

Rental assistance is an eligible cost category under the RRH program component and may be tenant-based (TBRA), sponsor-based (SBRA), or project-based (PBRA), depending upon the component and project type. SBRA and PBRA are not currently funded in the HIC. Rental assistance may be short-term for up to 3 months, or medium-term for 3 to 24 months. Subrecipients must serve as many program participants as identified in their funding application to HUD. If the TBRA funding amount reserved for the term of the grant exceeds the amount needed to pay actual costs, the excess funds may be used to cover the rental needs of a greater number of program participants. Grant funds may be used in an amount not to exceed one month's rent to pay for any damage to the housing unit caused by the action of a participant. This is limited to a one-time cost per participant, incurred at the time a participant exits a housing unit. When rental assistance funds are used to pay rent on units, the lease must be between the program participant and the landowner. Each program participant, on whose behalf rental assistance payments are made, must pay a contribution toward rent consistent with the requirements of the interim rule or the HIC's Written Standards.

3.3.5.1.1.2 RRH Rental Assistance Geographic Areas - 24 CFR § 578.51(c)

TBRA program participants may select any appropriately sized unit within the HIC's geographic area, although subrecipients may restrict the location under certain circumstances to ensure the availability of appropriate supportive services.

Program participants who have complied with all program requirements during their residence, who have been a victim of domestic violence, dating violence, sexual assault, or stalking, who reasonably believe they are imminently threatened by harm from further domestic violence, dating violence, sexual assault, or stalking (which would include threats from a third party, such as a friend or family member of the perpetrator of the violence) if they remain in the assisted unit, and who are able to document the violence and basis for their belief, may retain their TBRA and move to a different CoC's geographic area if they move out of the assisted unit to protect their health and safety. These program participants may move to a different CoC's geographic service area even if the subrecipient cannot meet all regulatory requirements in the new geographic area where the unit is located. The subrecipient, however, must be able to meet all statutory requirements of the CoC program.

Program participants, other than survivors of domestic violence as described above, may choose housing outside of the HIC's geographic area if the subrecipient is able to meet all requirements of the CoC in the geographic area where the program participant chooses

housing. If the subrecipient is unable to meet requirements, the subrecipient may refuse to permit the program participant to retain the TBRA if the program participant chooses to move outside of the HIC's geographic area.

3.3.5.1.1.3 RRH Payment Requirements

Prior to payment of rental assistance, the rental unit must pass the necessary inspections (HQS/NSPIRE) and have an executed lease. Leases should be for the term of one year, but if extenuating circumstances exist (i.e., market conditions, landlord standards, unit scarcity), leases can be for a term of less than one year if mutually agreed upon by the landlord and participant. The federal portion of the TBRA payment for the unit may exceed HUD's published Fair Market Rent for CoC program funding but must comply with HUD standards for rent reasonableness (24 CFR § 982.507).

The project will pay the full cost of rent and the calculated utility allowance for participants in full calendar months 1, 2, and 3. If the first month of the lease is partial and prorated, it will not count as month 1. Each month thereafter month 3 assistance will be reassessed. If, based on rent-to-income ratio the participant is not able to pay full rent and utilities in months 4 and later, the participant is eligible to continue receiving rental assistance up to a total of 12 months per enrollment if the participant is adhering to all subrecipient project requirements and actively pursuing employment or mainstream resources for income, has gained employment, or is participating in job training or education.

Length of participation in the project will be determined through agreement between the participants and funded subrecipients. Through monthly case management, these parties will assess barriers to stability, housing stability, income stability, and rent-to-income ratios. When both the participant and household agree, rental assistance will cease.

If determined necessary, an additional 6 months of case management services may be made available to participants after the eligible months of housing assistance.

The following table identifies rent-to-income ranges and corresponding percentages of rent and utility allowances to be paid by each RRH household, which is the actual rent and utilities, if there are any. The length of rental assistance should be determined by the participant's need, as determined by monthly assessments, and should not be longer than 12 months per episode.

<u>Rent-to-Income Ratio Range</u>	<u>Percentage of rent/utilities paid by household</u>
50% or greater	0%
43-49%	25%
37-42%	50%
30-36%	75%
Less than 30%	100%

A household can only be eligible for RRH assistance 2 times in 3 years, and total rental assistance cannot exceed 24 months in that 3-year period.

A vacancy payment can pay rent for a maximum of 30 days from the end of the month in which the unit was vacated.

If the cost of any eligible utility (excluding telephone, cable television, or internet) for a residential rental unit is paid directly by the tenants and not by or through the owner of the rental, the gross rent for that unit includes an applicable utility allowance. IHFA branch offices or a local PHA may be contacted to assist with the generation of a utility allowance to be used in completing the rent calculation. The utility provider must be indicated if there are multiple options in the city in which the unit is located. The following information should be sent to the local IHFA branch office or PHA to obtain the analysis:

- City where the rental unit is located
- Bedroom size
- Maximum/minimum weatherization
- Heat- wood stove, propane, gas, or electric
- Heat Source- forced air, baseboard, pressurized/ceiling, fan forced
- Stove- propane, gas, or electric
- Water heater- propane, gas, or electric
- Water- well or city service
- Sewer- septic tank or city service
- Trash
- Refrigerator- whether provided by tenant or landlord
- Stove- whether provided by tenant or landlord

3.3.5.1.2 RRH Supportive Services - 24 CFR § 578.53

Supportive services are eligible costs under the RRH program component. The CoC program interim rule specifies all eligible services and clarifies that any cost not listed in the rule is ineligible. Services must be offered to residents of RRH for the full period of their participation. Program participants must meet with case managers not less than once per month. Supportive services may be provided for no longer than 6 months after rental assistance stops.

Subrecipients are required to perform an annual assessment of the service needs of their project participants and to adjust services accordingly. Eligible costs include the cost of providing services, the salary and benefits of staff providing services, and materials and supplies used in providing services. Reasonable one-time moving costs, including truck rental and hiring a moving company, are eligible costs.

3.3.5.1.3 RRH Operating - 24 CFR § 578.55

Operating costs are eligible under the RRH program component. Funds may be used to pay the day-to-day operating costs in a single structure or individual housing units, including maintenance (such as scheduled replacement of major systems), repair, building security (when CoC program funds pay for more than 50 percent of the facility by unit or area), electricity, gas, water, furniture, equipment, property insurance, and taxes. These costs may not be combined with rental assistance costs within the same unit or structure.

3.3.5.2 RRH Eligible Participants

Participants must meet one of the following:

- Category 1: Literally Homeless
- Category 4: Fleeing/Attempting to Flee Domestic Violence

For additional details related to the HUD definition of homelessness and applicability to each program, see Section 3.1.1.

3.3.6 Joint Transitional Housing/Rapid Rehousing Component

Joint Transitional Housing/Rapid Rehousing (TH/RRH) assistance provides a new way to meet some of the pressing challenges that communities are facing. This component type provides a safe place for people to stay in transitional housing under 24 CFR § 578.37(a)(2), with financial assistance and wrap around supportive services determined by program participants to help them move into RRH under 24 CFR § 578.37(a)(1)(ii) as quickly as possible.

HUD limits the eligible costs for this project type to:

- Leasing of a structure or units, and operating costs to provide transitional housing
- Short- or medium-term tenant-based rental assistance on behalf of program participants in the rapid rehousing portion of the project
- Supportive services for the entire project
- HMIS for the entire project
- Administrative costs for the entire project

If awarded funding under this component, subrecipients must be able to provide both components, including the units supported by the transitional housing component and the tenant-based rental assistance and services provided through the RRH component, to all program participants as needed by the program participants. For example, a program participant may only need the temporary stay in transitional housing unit, but the recipient or subrecipient must be able to make available financial assistance and supportive services that traditionally come with rapid rehousing assistance to that program participant. This does not mean, however, that the subrecipient is required to request funding from the CoC Program for both portions of the project (the subrecipient may leverage other resources to pay for the transitional housing portion of the project).

See Sections 3.3.4 and 3.3.5 for component specifics.

3.3.6.1 TH/RRH Eligible Participants

Participants must meet one of the following:

- Category 1: Literally Homeless
- Category 4: Fleeing/Attempting to Flee Domestic Violence

For additional details related to the HUD definition of homelessness and applicability to each program, see Section 3.1.1.

3.3.7 Supportive Services Only Component - 24 CFR § 578.37(a)(3)

Supportive Services Only (SSO) grants may use funding for acquisition, rehabilitation, relocation costs, or leasing of a facility from which supportive services will be provided, in order to provide those services to unsheltered and sheltered homeless persons for whom the recipient or subrecipient is not providing housing or housing assistance. SSO also includes funds for street outreach.

During the CoC competition process, the recipient only provides for and accepts applications for SSO projects to be used for the purposes of Coordinated Entry. Although Street Outreach is an

eligible project type under SSO, applications for this project type are not currently accepted during the CoC competition.

3.3.8 HMIS “Only” Component - 24 CFR § 578.37(a)(4)

The HMIS “Only” component, as a standalone grant, may only be used by the HMIS Lead agency to lease a structure in which the HMIS is operated or as operating funds to operate a structure in which the HMIS is operated, and for other costs eligible in 24 CFR § 578.57(a)(1). Eligible costs mirror other HMIS grants in that it can provide for:

- Purchasing or leasing computer hardware
- Purchasing software or software licenses
- Purchasing or leasing equipment, including telephones, fax machines, and furniture
- Obtaining technical support
- Leasing office space
- Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS
- Paying salaries for staff operating HMIS

If the recipient of CoC funding is the HMIS Lead agency, then it may use CoC funds to pay the costs of (24 CFR § 578.57(a)(2)):

- Hosting and maintaining HMIS software or data
- Backing up, recovering, or repairing HMIS software or data
- Upgrading, customizing, and enhancing the HMIS
- Integrating and warehousing data, including development of a data warehouse for use in aggregating data from subrecipients using multiple software systems
- Administering the system
- Reporting to providers, the HIC, and HUD
- Conducting training on using the system, including traveling to the training.

3.3.9 General CoC Components

The following components of the CoC program can be applied to all grant types (PSH, RRH, TH, SSO, HMIS). Subrecipients requesting these components should apply for them during the annual CoC competition, and post-award, subrecipients should consult their project budget included with their grant agreement to verify their inclusion.

3.3.9.1 Data Collection (HMIS) - 24 CFR § 576.107

- Purchasing or leasing computer hardware, software and/or software licenses, leasing office space, equipment (telephones, fax machines, furniture), obtaining technical support, and utilities for HMIS/CMIS/comparable database activities. In addition, salaries of data collection staff, operating costs, and duties as required to operate an HMIS/CMIS/comparable database, trainings related to the use of a HMIS/CMIS/comparable database, and reporting to the HIC with the HMIS/CMIS/comparable database are eligible costs. - 24 CFR § 578.57(a)(1)
- If the subrecipient is a victim services provider or a legal services provider, it may use CoC funds to establish and operate a comparable database that collects client-level data over time (i.e., longitudinal data) and generates unduplicated aggregate reports based on the data.

Information entered into a comparable database must not be entered directly into or provided to HMIS. - 24 CFR § 578.57(a)(3)

3.3.9.2 Administrative Costs - 24 CFR § 578.59

The maximum allocation of Administrative costs allowed by HUD is 10% of the total CoC grant award. The recipient further imposes a restriction on this in order to utilize more CoC funding to directly support the housing needs of participants by imposing a 7% maximum Administrative cap on CoC project grants. The recipient will then split administrative costs with subrecipients. Subrecipients will receive the greater amount of 3.5% of the total CoC project admin, and the recipient will receive the other 3.5%. If a CoC projects is awarded, which exceeds the maximum Administrative costs allowed by the recipient, or if a CoC project receives lower than 7%, or for any other reason, then the recipient will split Administrative costs equally between the subrecipient (50/50).

This does not include staff and overhead costs directly related to carrying out activities eligible under 24 CFR § 578.43 through CFR 24 § 578.57 as listed above, because those costs are eligible as part of those activities. Eligible administrative costs include:

General management, oversight and coordination - 24 CFR § 578.59(a)(1)

Costs of overall project management, coordination, monitoring, and evaluation.

- Salaries, wages, and related costs of the staff of subrecipients, or other staff engaged in project administration. All salaries must be documented utilizing an hourly rate form.
- Other non-wage based administrative eligible activities include preparing project budgets and schedules, and amendments to those budgets and schedules; developing systems for assuring compliance with program requirements; developing interagency agreements and agreements with subrecipients (for the recipient) and contractors to carry out project activities; monitoring project activities for progress and compliance with program requirements; preparing reports and other documents directly related to the project for submission to HUD; coordinating the resolution of audit and monitoring findings; evaluating project results against stated objectives; and managing or supervising administrative staff.

3.3.10 CoC Match - 24 CFR § 578.73

Under CoC, subrecipients agree to match 25% of funds available (“Leasing” funds do not require match contribution) under the Grant Agreement with funding from other sources. All match funds must be spent on CoC-eligible activities within the period of the Grant Agreement. All match contributions must be submitted with draw documentation and be equal to or greater than the 25% match requirement for CoC by the end of the grant period.

3.3.10.1 CoC In-Kind Memorandum of Understanding - 24 CFR § 578.73(c)(3)

For CoC, before grant execution, in-kind services to be provided by a third party must be documented by a Memorandum of Understanding (MOU) between the subrecipient and the third party that will provide the services. Services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work by the subrecipient. If the subrecipient does not have employees performing similar work, the rates must be consistent with those ordinarily paid by other employers for similar work in the same labor market.

The MOU must establish the unconditional commitment, except for selection to receive a grant, by the third party to provide the services, the specific service to be provided, the profession of the persons providing the service, and the hourly cost of the service to be provided. During the term of the grant, the recipient or subrecipient must keep and make available, for inspection, records documenting the service hours provided.

See section 4.2.7 for eligible forms of match under the CoC program.

3.3.11 CoC References

- Federal Regulations: <https://www.gpo.gov/fdsys/granule/CFR-2013-title24-vol3/CFR-2013-title24-vol3-part578/content-detail.html>
- HUD CoC Program Toolkit: <https://www.hudexchange.info/programs/coc/>

3.4 Other Applicable Federal Regulations

3.4.1 Conflicts of Interest

3.4.1.1 Procurement - 2 CFR § 200.318

For the procurement of property (goods, supplies, or equipment) and services, the recipient and its subrecipients must comply with the codes of conduct and conflict-of-interest requirements under 2 CFR 200.

3.4.1.2 Board Members - 2 CFR § 200.318(c)(1)

No board member operating under the CoC or ESG programs may participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefits to the organization that the member represents. Board members will be required to sign a Conflict-of-Interest Disclosure form annually.

3.4.1.3 Organizational Conflict - 2 CFR § 200.318(c)(2)

An organizational conflict of interest arises when, because of activities or relationships with other persons or organizations, the recipient or subrecipient is unable or potentially unable to render impartial assistance in the provision of any type or amount of assistance under this part, or when a covered person's objectivity in performing work with respect to any activity assisted under this part is or might be otherwise impaired. Such an organizational conflict would arise when a board member of an applicant participates in a decision concerning the award of a grant, or provision of other financial benefits, to the organization that such member represents. It would also arise when an employee of a subrecipient participates in making rent reasonableness determinations and housing quality inspections of property that the subrecipient or related entity owns. Each funded subrecipient will sign annually, as a part of their Grant Agreement, a contract attachment disclosing any potential conflicts of interest.

3.4.1.4 Other Conflicts

For all other transactions and activities, the following restrictions apply: No covered person, meaning a person who is an employee, agent, consultant, officer, or elected or appointed official of the recipient or its subrecipients and who exercises or has exercised any functions or responsibilities with respect to activities assisted under this part, or who is in a position to participate in a decision-making process or gain inside information with regard to activities assisted under this part, may obtain a financial interest or benefit from an assisted activity,

have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity, or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has immediate family or business ties, during his or her tenure or during the one-year period following his or her tenure.

3.4.2 Lived Experience Participation

Minimum standards for participation of an individual with lived experience are:

- Each funded subrecipient of CoC or ESG assistance must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or equivalent policymaking entity of the subrecipient.
- To the maximum extent possible, the subrecipient shall involve homeless individuals and families in paid or volunteer work on CoC or ESG-funded facilities, in providing services under CoC or ESG, and in providing services for occupants of CoC or ESG funded facilities.

3.4.3 Faith-Based Activities

Faith-based organizations may be recipients or subrecipients of funds under the CoC or ESG programs on the same basis as any other organization as identified under 24 CFR § 578.87(b) and 24 CFR § 576.406. The recipient and the HIC will not, in the selection of subrecipients, discriminate against any organization based on the organization's religious character, affiliation, or exercise thereof.

However, minimum standards for faith-based activities apply:

- Subrecipients receiving CoC or ESG funding shall not engage in inherently religious activities as part of the CoC or ESG funded projects or services. Such activities must be offered separately from CoC or ESG funded projects and services, and participation must be voluntary.
- A religious organization receiving CoC or ESG funding retains independence from government and may continue with its mission provided that CoC or ESG funds are not used to support inherently religious activities. A CoC or ESG funded subrecipient retains its authority over its internal governance.
- Any organization receiving CoC or ESG funding shall not discriminate against a participant or prospective participation based on religion or religious beliefs.
- CoC or ESG funding shall not be used for the rehabilitation of structures used specifically for religious activities but may be used for rehabilitating structures that are used for CoC or ESG eligible activities.

3.4.4 Prohibition Against Involuntary Family Separation

The age and gender of a child under age 18 must not be used as a basis for denying any family's admission to any housing or shelter receiving funding from either CoC under 24 CFR § 578.93(e) or ESG under 24 CFR § 576.102(b).

3.4.5 Nondiscrimination/Equal Opportunity/Affirmative Outreach

Minimum standards shall comply with the requirements for nondiscrimination, equal opportunity, and affirmative outreach identified in 24 CFR § 576.407 and 24 CFR § 578.93(a-b).

3.4.6 Termination/Grievance

Subrecipients may terminate CoC or ESG assistance to participants who violate project requirements. The subrecipient must have a process in place that governs its termination and grievance procedures and must make this policy available to participants either by written handouts or posting of the policy used by the project. The policy should be simple and unambiguous, and provide participants with clear deadlines, contact information, and instructions.

The subrecipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination, so that a project participant's assistance is terminated only in the most severe cases.

3.4.6.1 Minimum Standards for Termination of Assistance

3.4.6.1.1 General.

If a project violation occurs and the subrecipient terminates assistance as a result, the termination shall follow an established process that recognizes the rights of the individuals affected. Termination shall only occur in the most severe cases after other remedies have been attempted.

3.4.6.1.2 Due process rights

When a CoC or ESG funded project seeks to terminate participation for any household, the required formal process shall minimally consist of:

- Written notice clearly stating the reasons for termination and restating remedies attempted to avoid termination.
- Review of the policy and process that gives the participant opportunity to present objections to the decision made, and to have representation. Any appeal of a decision shall be heard by an individual different from and not subordinate to the initial decision-maker.
- Clear deadlines and manner in which an appeal must be requested.
- Prompt written notice of the final decision on the appeal.

3.4.6.1.3 Ability to provide further assistance.

Termination will not bar the subrecipient from later providing additional assistance to the same family or individual.

3.4.7 Connection with Mainstream and Other Resources

Minimum standards for connection with other resources consist of assisting each participant to obtain appropriate supportive services, and other governmental and private assistance available to help with housing stability. This includes, but is not limited to, programs offered through the US Department of Health and Human Services, the US Department of Veterans Affairs, and the US Department of Education, among others.

3.4.8 Environmental Review

Federally funded projects are subject to an environmental review process under 24 CFR § 578.31 for the CoC program and 24 CFR § 576.407(d) for the ESG program. The recipient acts on behalf of HUD as the responsible entity to determine if the CoC or ESG activity complies with the

requirements in 24 CFR Part 50 or 58. Any subrecipient requesting funds for activities under CoC or ESG may be subject to full or partial environmental review as applicable. The recipient will define the level of review required and complete and document all environmental requirements. The environmental review process must be complete before any project funds are expended, or in cases of CoC leasing funds, prior to recipient reimbursement for those costs.

3.4.9 Lead-Based Paint

Minimum standards for all shelters and project participant-occupied housing consist of compliance with the lead-based paint remediation and disclosure requirements identified in 24 CFR § 576.403 and 24 CFR § 578.99(f), including the Lead-Based Paint Poisoning Prevention Act (42 USC 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 USC 4851-4856) and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M and R.

3.4.10 Rent Reasonableness

Units assisted with Rental Assistance funds under the CoC and ESG programs, as well as units assisted with Leasing funds under the CoC program, must meet the standard of rent reasonableness (ESG program 24 CFR § 576.106(d)(1) and CoC program 24 CFR § 578.51(g)). Under ESG, Rent Reasonableness will apply to both the Rapid Rehousing and Homeless Prevention program components. Under CoC, it will apply to both Rapid Rehousing and Permanent Supportive Housing program components.

HUD regulations define a reasonable rent as one that does not exceed the rent charged for comparable, unassisted units in the same market area. HUD also requires that owners not charge more for assisted units than for comparable units on the premises. In determining rent reasonableness, subrecipients must consider the gross rent of the unit and the location, quality, size, type, and age of the unit, and any amenities, maintenance, and utilities to be provided by the owner.

The following policy details how to determine and document whether a unit's rent is reasonable for CoC or ESG funded subrecipients.

3.4.10.1 When Rent Reasonableness Determinations are Required

The subrecipient must make a rent reasonableness determination before initial occupancy of the unit by a CoC or ESG participant and whenever the owner requests a rent adjustment. HUD also requires a determination of rent reasonableness if there is a 10% decrease in the Fair Market Rent (FMR) rate that goes into effect at least 60 days before the lease anniversary date.

Rent reasonableness documentation for newly rented units and units with rent adjustments must be submitted with subrecipient draws. Rent reasonableness documentation may also be submitted for approval prior to renting a unit by emailing the SNAP team at snap@ihfa.org. If the recipient determines during draw review that a unit does not meet rent reasonableness standards, reimbursement for rent for that unit will not be paid to the subrecipient.

There are no exceptions to rent reasonableness requirements for proposed units that are tax credit units or other income-limited units due to HUD requirements.

3.4.10.2 Determining and Documenting Rent Reasonableness

Rent reasonableness can be documented in one of three ways. The first acceptable documentation method is by completing the Rent Reasonableness Certification form; this will include filling out information about the proposed unit to be rented as well as three comparable units, or “comps.” The second acceptable method of documentation is obtaining a written verification signed by the property owner or management company of the proposed unit, on letterhead, affirming that the rent for the unit assisted with CoC or ESG program funds is comparable to current rents charged for similar unassisted units managed by the same owner. The third acceptable method of documentation is to fill out and complete the official HUD Rent Reasonableness form.

If utilizing one of the Rent Reasonableness Certification forms, the form must be completed according to the instructions available with the form. The gross rent of the proposed unit must not exceed \$50 over the average gross rent of the three documented comparable units.

The Rent Reasonableness Certification forms or a letter from the property owner must be submitted with draw documentation for any newly rented unit or newly rent-adjusted unit paid for with CoC or ESG Rental Assistance funds, or CoC Leasing funds. Any backup documentation or source information for comps must be kept in the client file.

3.4.10.3 Determining Comparability

Comparable units must be similar to the proposed unit in the following ways: have the same number of bedrooms, be in the same market area*, and be the same type of housing (single family home, apartment, manufactured home, etc.).

*Exceptions will be made for units in very rural locations. If the proposed unit is in a rural area where three comparable units cannot be found, comparable units may be found in other rural areas in the same state.

As much as is practicable, comparable units must be similar in size, age, quality, and available amenities. Any on-site maintenance and utilities provided by the owner should also be taken into account.

Comparable units must represent unrestricted market rents. Therefore, units that receive some form of federal, state, or local assistance that imposes rent restrictions cannot be considered comparable units. These include units assisted by HUD through any of the following programs: Section 8 project-based assistance, Section 236 and Section 221(d)(3) Below Market Interest Rate (BMIR) projects, HOME or Community Development Block Grant (CDBG) program-assisted units in which the rents are subsidized; units subsidized through federal, state, or local tax credits; units subsidized by the Department of Agriculture rural housing programs, and units that are rent-controlled by local ordinance.

3.4.10.4 Rent Reasonableness and Fair Market Rent (FMR)

3.4.10.4.1 ESG

- Units subsidized by ESG Rental Assistance funds must be at or below Fair Market Rent (FMR) AND must meet rent reasonableness standards. Under this guideline, Rent Reasonableness will apply to both the Rapid Rehousing and Homeless Prevention program components

3.4.10.4.2 CoC

- Rental Assistance - Units subsidized by CoC Rental Assistance funds may exceed FMR, but must meet rent reasonableness standards.
- Leasing - Units subsidized by CoC Leasing funds must be at or below Fair Market Rent (FMR) AND must meet rent reasonableness standards.

CoC and ESG funds will be limited to the above guidelines and will only be reimbursed “up to” those limits. For units that go over FMR/Rent Reasonableness standards as listed above, subrecipients may utilize other funding sources to pay any overage that exceeds the above standards.

3.4.11 Subrecipient Spending Plans/Slow Spenders

Spending Plans may be required from subrecipients throughout the duration of their grant if a subrecipient is severely underspending on their respective grant at any time. The recipient will gauge this in relation to the percentage of time that has passed on the grant (example: 6 months of a 12-month grant = 50%) and if the subrecipient is underspending by more than 15% of their grant in relation to the time passed. The recipient will assess this on an as needed basis in order to either request amendments to slow spending grants, or to gauge a subrecipient’s capability to fully spend down their remaining funds. When the recipient requests spending plans from CoC or ESG subrecipients, the recipient will note in communications with the subrecipient when the spending plan is due. If the subrecipient fails to turn in a spending plan by the due date indicated in communications, the subrecipient may be subject to any penalties outlined in their grant agreement.

3.4.12 Emergency Transfer Plan: Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

Survivors of domestic violence, dating violence, stalking and human trafficking living in federally assisted housing often need to move to another subsidized unit to protect their safety and maintain affordable housing. In accordance with the HUD Final Rule Regarding the Implementation of Housing Protections Authorized in the Violence Against Women Reauthorization Act (VAWA), the HIC coordinates emergency transfers when survivors need to move to another safe and available subsidized unit.

In compliance with VAWA, the HIC has adopted an emergency transfer plan that identifies tenants/occupants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance on safety and security. That plan is included in Appendix I of this document.

All recipients and subrecipients of federal, county, or state funds for Permanent Supportive Housing, Rapid Rehousing, and Transitional Housing projects must follow the HIC’s Emergency Transfer Plan, must make the transfer plan publicly available whenever feasible, and must make the plan available to participants and community partners upon request. The subrecipient must also ensure that refusal of a transfer unit is not a basis for terminating a tenant from assistance. Subrecipients are encouraged, but not required, to bear moving costs related to emergency transfers. As necessary, subrecipients are encouraged to work with survivors to identify ways to pay for moves associated with emergency transfers.

3.4.13 Non-Discrimination, Equal Access, & Reasonable Accommodations

The HIC is committed to principles of non-discrimination, equal opportunity, and fair housing. To meet provisions within the Fair Housing Act, all HIC facilities, programs, services, and events will be made available to all qualified individuals, regardless of race, color, religion, national origin, sex, familial status (the presence of children under 18), or disability.

Subrecipients of CoC or ESG program funds shall not use their funds to promote “gender ideology,” as defined in E.O. 14168, Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government; agrees that its compliance in all respects with all applicable Federal anti-discrimination laws is material to the U.S. Government’s payment decisions for purposes of section 3729(b)(4) of title 31, United States Code.

Program funds will also not be permitted to be used for purposes of:

- Operation of any programs that violate any applicable Federal anti-discrimination laws, including Title VI of the Civil Rights Act of 1964
- Funding or promoting elective abortions, as required by E.O. 14182, Enforcing the Hyde Amendment

Any project operating within the HIC will consider all requests for Reasonable Accommodation involving people with disabilities. Reasonable Accommodations include exceptions to policies and procedures necessary to remove or minimize barriers for people with disabilities. When requested in connection with the HIC’s facilities, programs, services, and events, requests will be received and evaluated for reasonableness by management of the program area.

For further information on the Fair Housing Act and it’s applicability to CoC and ESG programs, please see: <https://www.congress.gov/crs-product/R48113#:~:text=The%20FHA%20prohibits%20discrimination%20on%20the%20basis%20of%20race%2C%20color,housing%20financing%2C%20and%20brokerage%20services.>

3.4.14 Duplication of Benefits Policy

A duplication of benefits (DOB) occurs when a person, household, business, government, or other entity receives financial assistance from multiple sources for the same purpose, and the total assistance received for that purpose is more than the total need for assistance. Within the CoC and ESG programs, all recipients and subrecipients are bound by Section 312 of the Stafford Act, as amended, and the OMB Cost Principles within 2 CFR part 200 that require that all costs must “be necessary and reasonable for the performance of the Federal award.” The Stafford Act prohibits beneficiaries of federal disaster grants from receiving financial assistance under any other program, or from insurance or any other source, for the same disaster loss.

As part of the application process, the HIC will require each applicant to complete a DOB analysis indicating that the proposed activities are not anticipated to result in a duplication of benefit at the activity level. Further, analysis is required at the program participant level when financial assistance is provided to the participant for housing relocation or stabilization services as described in 24 CFR § 576.105(a) as amended by CPD Notice 21-08. Subrecipients are responsible for ensuring that a DOB does not occur when carrying out funded activities. The recipient is responsible for monitoring and ensuring subrecipient compliance.

There are a variety of funding sources that may be considered a DOB depending on the funding source, purpose, and use. The following are some examples that would be considered and not be considered a DOB:

Assistance considered to be a potential DOB includes:

- Other Federal CARES Act funding (e.g., US Treasury)
- Cash awards
- Insurance proceeds
- Grants
- Awards or assistance under local, state, and private or nonprofit organizations (e.g. Community Action Agency, Low-Income Home Energy Assistance Program, Family Investment Program)
- Other HUD grants (e.g., HOME, CDBG)

Assistance NOT considered to be a potential DOB includes:

- Personal assets such as money in a checking or savings account (excluding insurance proceeds or other assistance deposited into the program participant's account)
- Unemployment benefits
- Retirement accounts
- Credit cards and lines of credit
- In-kind donations (although these non-cash contributions known to the grantee reduce total need)
- Assistance provided for a different purpose than the CoC or ESG eligible activity, or a general, non-specific purpose (e.g., "disaster relief/recovery") and not used for the same purpose
- Funds not available to the program participant, like when insurance funds must be used for a forced mortgage payoff
- Some types of loans: Declined or cancelled subsidized loans (including SBA loans); Private loans; Government-subsidized loans, provided that all Federal assistance is used toward a loss suffered as a result of a major disaster or emergency.

Subrecipient Policies and Procedures

All subrecipients are responsible for adopting DOB Policies and Procedures and ensuring compliance for projects at the activity and rental assistance level. Subrecipients are responsible for using the following process to analyze and determine if a DOB exists at the activity or financial assistance level. For any subrecipient providing rental assistance or other financial assistance, duplication of benefit provisions must be established for the individual or entity receiving the cash payment. For example, if the subrecipient makes a rental assistance payment on behalf of a program participant to a landlord that is later deemed to be duplicative in nature, the subrecipient must collect the duplicated payment from the landlord and cannot collect the duplicated payment from the program participant without prior written authorization from the State. When providing financial assistance for housing relocation and stabilization services (24 CFR § 576.105(a) as amended by CPD Notice 21-08) through homeless prevention or rapid rehousing program components, subrecipients are encouraged to use a checklist as part of intake to document other assistance being provided. Further, subrecipients should ensure that the landlord or property manager is aware that duplicated assistance must be repaid and document such requirement in the 3rd party lease agreement with the landlord/property manager.

If a DOB is determined to exist, the subrecipient is responsible for recapturing the assistance that is determined to be duplicative. The subrecipient is responsible for reporting any determination of DOB to the recipient. The recipient is responsible for monitoring subrecipients to ensure that all activities are carried out in accordance with the subrecipient's DOB Policies and Procedures. In accordance with this, the recipient will monitor subrecipients to ensure compliance with duplication of benefits requirements.

3.4.15 Violence Against Women Act (VAWA) 2022

3.4.15.1 Prohibition Against Denial of Admission and Eviction

Survivors cannot be denied or evicted from CoC or ESG-assisted rental assistance projects solely due to their status as survivors of domestic violence, dating violence, sexual assault, or stalking. This includes reasons related to the violence that they have experienced, such as bad rental or credit history and criminal history.

3.4.15.2 Emergency Transfer Plan (See Appendix for IHFA's Plan)

CoC recipients are required to establish a VAWA Emergency Transfer Plan that complies with the regulations at 24 CFR § 578.99(j)(8) and 24 CFR § 5.2005(e). VAWA Emergency Transfer Plans govern how projects in the HIC will respond to requests for emergency transfers from survivors.

ESG recipients must develop an Emergency Transfer Plan that complies with 24 CFR § 576.409(d) and 24 CFR § 5.2005(e) or, if the recipient is a state, the State's subrecipients must administer ESG rental assistance and develop the Emergency Transfer Plan. If the State's subrecipients are required to develop the plan, the State must specify whether the Emergency Transfer Plan is to be developed for:

- The State as a whole.
- Each area within the state covered by a CoC; or
- Each subrecipient that administers ESG rental assistance

3.4.15.3 Lease Bifurcation

A survivor residing in a CoC or ESG project providing rental assistance can request a lease bifurcation, which allows the survivor to retain the existing assistance without the presence of the perpetrator in the unit. The regulations allow the CoC and ESG projects to continue assistance for a period of time, to allow survivors to either establish assistance on their own or to find other housing.

3.4.15.4 Notification

CoC and ESG subrecipients must provide notification regarding VAWA protections to applicants who are denied housing, project participants admitted to housing, and project participants notified of eviction and/or termination of assistance. HUD is in the process of revising the VAWA forms, including the HUD-5380 notification form. <https://www.hud.gov/sites/documents/5380.docx>

3.4.15.5 Lease Addendum

Units receiving CoC or ESG rental assistance must have leases or rental agreements that incorporate VAWA protections including prohibition of denial or eviction, lease bifurcation, and emergency transfers.

The [HUD-91067 VAWA Lease Addendum](#) provides an example.

3.4.15.6 Change to Category 4 Homeless Definition

VAWA 2022 changes the Category 4 definition of homelessness to the following: Any individual or family who

- Is experiencing trauma or lack of safety related to, or fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized.
- Has no other safe residence; and
- Lacks the resources to obtain other safe permanent housing.

3.4.15.7 Changes to VAWA's Definition of "Domestic Violence"

VAWA 2022 expands the definition of "domestic violence" to include "technological abuse" and "economic abuse" as forms of domestic violence.

<https://www.federalregister.gov/d/2022-28073/p-34>

3.4.15.8 Compliance Requirements

VAWA 2022 requires existing compliance review processes of recipients to include the following items for examination:

- Compliance with VAWA requirements prohibiting the denial of assistance, tenancy, or occupancy rights on the basis of domestic violence, dating violence, sexual assault or stalking.
- Compliance with VAWA confidentiality provisions.
- Compliance with VAWA notification requirements.
- Compliance with accepting VAWA documentation from survivors.
- Compliance with emergency transfer requirements.
- Compliance with the prohibition on retaliation.

3.4.15.9 Prohibiting Retaliation Against Survivors

VAWA 2022 prohibits covered housing providers from coercing, intimidating, threatening, or retaliating against a survivor for seeking or exercising their VAWA rights.

3.4.15.10 The Right to Report Crime and Emergencies

Landlords, homeowners, tenants, residents, occupants, and guests of, and applicants for, housing have the right to seek law enforcement or emergency assistance on their own behalf or on behalf of another person in need of assistance.

Prohibits application of actual or threatened penalties to protected persons based on their request for assistance or based on criminal activity of which they are a victim of or otherwise not at fault under the laws or policies adopted or enforced by covered government entities.

3.4.15.11 New Eligible Continuum of Care Activity

VAWA 2022 added the following activity to the CoC program: facilitating and coordinating activities to ensure compliance with (the emergency transfer plan requirement in 34 U.S.C. 12491(e)) and monitoring compliance with (the confidentiality requirement in 34 U.S.C. 12491(c)(4)). This means

that CoC subrecipients can pay for activities to ensure compliance with implementing emergency transfers and monitoring compliance with VAWA confidentiality requirements.

The line item will be included on all future CoC applications developed by the recipient and will be denoted as “VAWA” on the budget form. CoC subrecipients wishing to utilize this new line item can request a budget modification to add funds to this line item from an existing line item or apply for the line item during the CoC competition. This line item is not subject to administrative caps.

3.4.15.12 Filing a VAWA Complaint

HUD has established a website where individuals can file a complaint if they believe their VAWA rights have been violated- https://www.hud.gov/program_offices/fair_housing_equal_opp/VAWA

3.4.16 NSPIRE (National Standards for the Physical Inspection of Real Estate)

On May 10th, 2023, HUD published updates to the standards that it will use to assess whether housing meets minimum quality standards and may be assisted with HUD funds. These standards are known as the National Standards for the Physical Inspection of Real Estate (NSPIRE). The minimum standards established in 24 CFR § 5.703 of the Final Rule will apply to housing funded with CoC and ESG program funds beginning on **October 1, 2026**. NSPIRE will replace Housing Quality Standards (HQS) as the standard for HUD housing inspections.

CoC and ESG program subrecipients may apply the NSPIRE standards at 88 FR 40832 before October 1, 2026, provided that their project documents reflect the standards they are using and the date of transition to those standards. Otherwise, CoC and ESG subrecipients that are not ready to make the transition to the new standards will be expected to adhere to the former program requirements until the new compliance date. However, when HUD issues the standards specific to CoC and ESG programs, all subrecipients will be encouraged to prepare for the compliance date by updating their policies and procedures to reflect the program-specific standards.

3.4.17 Infectious Disease Preparedness and Response

Subrecipients must adopt procedures to prevent, prepare, and respond to emergencies and outbreaks in conjunction with Centers for Disease Control and Prevention (CDC) guidelines. Following potential outbreaks, the HIC will coordinate a response involving public health authorities and pertinent stakeholders. Further, best practices around safety can be found on the CDC’s Emergency Preparedness and Response website, and the following links:

<https://emergency.cdc.gov/>

<https://www.niaid.nih.gov/research/pandemic-preparedness>

https://www.hud.gov/sites/dfiles/Main/documents/CPD_coronavirus_message.pdf

The primary role of the HIC during a public health emergency is to help facilitate communication between subrecipients and external partners, such as public health officials or local government. Having a centralized flow of information can assist in providing clarity toward strengthening the community’s response. Subrecipients should inform the HIC when facing shortages in staffing, supplies, or technical assistance. These needs will be shared with and addressed by external partners where appropriate. Subrecipients must relay updates on outbreaks and ongoing efforts to both the HIC and the local public health authority. The HIC will reinforce messaging from public

health officials regarding sanitation, screening, mitigation, and reporting strategies to subrecipients. It will also work to ensure recommended public health practices are being implemented system wide.

Should special funding become available in response to an infectious disease outbreak, the HIC will coordinate efforts to disperse funds and update any guidelines in relation to those funds. The population served, resources and funding available, and methods of service delivery can vary between subrecipients across the HIC. Each subrecipient is strongly encouraged to tailor a disease response policy into the framework of their projects.

3.4.18 Build America, Buy America Act

The Build America, Buy America Act (BABA) requires that all iron, steel, manufactured products, and construction materials used for federally funded infrastructure projects be produced in the United States, unless otherwise exempt or subject to an approved waiver. This requirement is known as the "Buy America Preference (BAP)" and the specific requirements are codified in 2 CFR § 184. CoC and ESG funded projects must comply with the requirements of BABA, (41 USC 8301 note) and all applicable rules and notices, as may be amended, applicable to the project.

Pursuant to HUD's Notice, "Public Interest Phased Implementation Waiver for FY 2022 and 2023 of Build America, Buy America Provisions as Applied to Recipients of HUD Federal Financial Assistance" (88 FR 17001), CoC and ESG funds obligated by HUD on or after February 22, 2024, are subject to BABA requirements, unless excepted by a waiver.

3.4.19 Affirmative Outreach and Limited English Proficiency - 24 CFR 576.407(b)

All CoC and ESG program subrecipients should take reasonable steps to ensure meaningful access to their projects. Subrecipients must make it known that the use of the facilities, assistance, and services are available to all on a non-discriminatory basis. If it is unlikely that the procedures that the subrecipient intends to use to make known the availability of the facilities, assistance, and services will reach persons of any particular race, color, religion, sex, age, national origin, familial status, or disability who may qualify for those facilities and services, the subrecipient must then establish additional procedures to ensure those persons are made aware of the facilities, assistance, and services. Subrecipients must take appropriate steps to ensure effective communication with persons with disabilities including, but not limited to, adopting procedures that will make available to interested persons information concerning the location of assistance, services, and facilities that are accessible to persons with disabilities.

Consistent with Title VI and Executive Order 13166, subrecipients are also required to take reasonable steps to ensure meaningful access to programs and activities for persons with Limited English Proficiency, regardless of the language spoken. Meaningful access may entail providing language assistance services, such as oral and written translation, when necessary.

3.4.20 Eligible Match - 24 CFR § 578.73 (CoC) and 24 CFR § 576.201 (ESG)

Eligible types of matching contributions. The matching requirements may be met by one or both of the following:

3.4.20.1 Cash Contributions

Cash expended for allowable costs, as defined in OMB Circulars A-87 (2 CFR part 225) and A-122 (2 CFR part 230), of the subrecipient. Notwithstanding 2 CFR 200.306(b)(5), a subrecipient may use funds from any source, including any other federal sources (excluding other CoC or ESG program funds), as well as State, local, and private sources, provided that funds from the source are not statutorily prohibited to be used as match. The subrecipient must ensure that any funds used to satisfy matching requirements are eligible under the laws governing the funds in order to be used as matching funds.

3.4.20.2 In-kind (noncash) Contributions

The value of any real property, equipment, goods, or services contributed to the subrecipient's ESG project, provided that if the subrecipient had to pay for them with grant funds, the costs would have been allowable. In-kind contributions may also include the purchase value of any donated building.

Calculating the amount of in-kind contributions:

- To determine the value of any donated material or building, or of any lease, the subrecipient must use a method reasonably calculated to establish the fair market value.
- Services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work in the subrecipient's organization. If the subrecipient does not have employees performing similar work, the rates must be consistent with those ordinarily paid by other employers for similar work in the same labor market.
- Some in-kind contributions are real property, equipment, goods, or services that, if the subrecipient had to pay for them with grant funds, the payments would have been indirect costs. Matching credit for these contributions must be given only if the subrecipient has established, along with their regular indirect cost rate, a special rate for allocating to individual projects or programs the value of those contributions.

3.4.21 Reporting

3.4.21.1 HMIS or CMIS Reporting

All subrecipients funded under the CoC and ESG programs are required to use HMIS, CMIS, or a comparable database to record participant-level data on all persons served and all activities assisted under the CoC and ESG programs in accordance with HUD's standards for HMIS/CMIS.

The HIC has designated the recipient as the HMIS Lead Agency. The HMIS Lead Agency will ensure that this operation will be in compliance with the most current HMIS Data and Technical Standards. The HIC's Governance Charter includes further details on the HMIS Lead Agency's roles and responsibilities.

Coc and ESG subrecipients must utilize the statewide HMIS or CMIS software designated by the HMIS Lead Agency, or subrecipients may also choose to utilize a comparable database that captures the same elements as that provided by the HMIS Lead Agency. These systems are designed to record and store participant-level data, including the characteristic and service needs of the homeless and those at-risk of homelessness. Utilization of the HMIS/CMIS database will help provide a consistent and accurate snapshot of populations served through various programs.

Agencies utilizing HMIS, CMIS, or a comparable database are expected to comply with data quality standards, the HMIS or CMIS privacy plan, and the HMIS or CMIS security plan. Information shall be entered into the database in a timely manner, updated to provide exit information and income data, and have limited number of fields reported as "Missing."

Domestic violence subrecipients shall actively utilize CMIS or a comparable database and shall comply with HUD's most recent HMIS Data and Technical Standards.

The standards for a comparable database set forth in **24 CFR § 580.25** can be summarized as such:

- The comparable database must meet the standards of this part and comply with all HMIS data information, security, and processing standards, as established by HUD.
- The comparable database must meet the standards for security, data quality, and privacy of the HMIS Lead Agency within the HIC, and the comparable database may use more stringent standards than the HIC's HMIS.
- Domestic violence subrecipients and legal services providers may suppress aggregate data on specific participant characteristics if those characteristics meet any requirements and conditions that may be established by HUD.

3.4.21.2 CoC Annual Performance Report

The CoC program requires the recipient to submit an Annual Performance Report (APR) to HUD. Because the recipient acts as a UFA for the HIC, APRs are submitted to HUD directly from the recipient and report data, finances, and performance accomplishments cumulatively across the entire HIC. Subrecipients are required to submit APR booklets to the recipient upon request and work with the HMIS Lead Agency to correct any errors in data.

UFAs are required to report outputs and outcomes for all projects, but because funding for projects is combined into a single renewal grant, it is important to clarify that UFAs are not required to submit a separate APR for each project. UFAs are required to submit at least one APR for each program component and subcomponent funded under a renewal grant, and a separate APR for each program component and subcomponent funded under a NEW grant.

3.4.21.3 ESG Consolidated Annual Performance and Evaluation Report

Recipients of HUD ESG funding are required to submit a Consolidated Annual Performance and Evaluation Report (CAPER) to HUD annually. Data collection for the ESG portion of the CAPER is aligned with the most recent version of the HMIS data standards. ESG recipients submit accomplishment data in the Sage HMIS Reporting Repository (Sage), and project reports (Comma Separated Value (CSV) downloads) generated by HMIS, CMIS, or comparable databases are uploaded directly into Sage by subrecipients.

The recipient will send a request by email to all affected subrecipients annually in April. Subrecipients will be expected to work with the HMIS/CMIS team to correct any data errors and upload their CSV files into Sage. The recipient will be responsible for submitting financial and other performance data in Sage but may request additional information from subrecipients to complete the CAPER.

3.4.21.4 Quarterly Data Quality Reporting

The HMIS Lead Agency will, on a quarterly basis or other frequency determined by the HIC, produce HMIS and CMIS reports to the HIC and the Informing Idaho Committee for review and approval. Should the HIC identify other meaningful and valuable reports to assist in measuring system improvement and success, the HMIS Lead Agency will be approached to discuss their ability to produce such reports. For reports currently generated, the Informing Idaho Committee will use the results to promote improved data completeness and quality among HMIS- and CMIS-participating agencies.

3.4.22 Confidentiality (24 CFR Part 578.103(b))

In addition to meeting the specific confidentiality and security requirements for HMIS or CMIS data, subrecipients are required to establish written procedures to ensure records containing project participant identifying information are kept secure and confidential. The address or location of domestic violence program sites will not be made public and the address or location of any housing of a project participant will not be made public.

3.4.23 Access to Records (24 CFR Part 578.103(d))

All records are subject to federal and public rights as outlined in this rule. Notwithstanding confidentiality procedures, HUD, the HUD Office of the Inspector General, and the Controller General of the United States, or any of their authorized representatives, must have the right of access to all books, documents, papers, or other records of the recipient and its subrecipients that are pertinent to CoC program grant audits, examinations, excerpts, and transcripts.

3.4.24 CoC Project Changes

Subrecipients may not make any significant changes to a project that alters the scope of the project or the project budget without prior approval by the HIC. Once a request for a project change has been submitted to the recipient and processed by the recipient the HIC will approve or deny the change. Should the HIC approve a project change, HUD will then be notified by letter of HIC approval, and the recipient will submit a formal amendment to HUD requesting the change. If approved by HUD, the change will then be formalized in a grant amendment signed by HUD and the recipient. Any minor budgetary changes (budget shifts under 10%) to an approved project must be submitted to the recipient for approval and fully documented in subrecipient records upon approval.

3.4.25 Preventing Fraud, Waste, and Abuse

Subrecipients who become aware of the existence or apparent existence of fraud, waste, or abuse of any HUD award must report such incidents to both the HUD official responsible for the award and to HUD's Office of Inspector General (OIG). HUD OIG is available to receive allegations of fraud, waste, and abuse related to HUD programs via its hotline number (1-800-347-3735) and its online hotline form. Subrecipients must comply with 41 U.S.C. § 4712, which includes informing subrecipient employees in writing of their rights and remedies, in the predominant native language of the workforce. Under 41 U.S.C. § 4712, employees of a government contractor, subcontractor, grantee, and subgrantee - as well as a personal services contractor - who make a protected disclosure about a Federal grant or contract cannot be discharged, demoted, or otherwise discriminated against as long as they reasonably believe the information they disclose is evidence of:

- Gross mismanagement of a Federal contract or grant;
- Waste of Federal funds;
- Abuse of authority relating to a Federal contract or grant;
- Substantial and specific danger to public health and safety; or
- Violations of law, rule, or regulations related to a Federal contract or grant.

4. Program Monitoring

Multiple forms of monitoring exist including project, performance, and HMIS/CMIS. Project compliance will be carried out by the recipient. Performance compliance will be enforced by the recipient and HUD. HMIS/CMIS compliance will be conducted and enforced by the HMIS Lead Agency.

In executing project compliance, the recipient will establish and maintain standard procedures for ensuring that CoC and ESG program funds are used in accordance with federal requirements and will establish and maintain sufficient records to enable HUD to determine whether subrecipients are meeting the requirements of 2 CFR 200.

CoC and ESG program monitoring activities will include financial, and project compliance outlined in 2 CFR 200 and identified in this policy and the supporting CoC and ESG Project Monitoring Checklists.

HUD maintains responsibility for monitoring all CoC and ESG recipients, including monitoring a sample of subrecipients when a recipient is selected for HUD program monitoring. Noncompliance with HUD and local regulation and policy may result in the full or partial defunding of a grant, required technical assistance and/or training, required transfer of the grant to a new subrecipient, or a variation of the remedies herein.

Performance compliance will be assessed by the recipient, with support from the HMIS Lead Agency. Performance includes adherence to system performance, data quality, and data completeness measures or standards. Any defunding or reassigning of grant activities must be approved by the HIC. Additional detail regarding this process is included in Section 5: Systemwide Performance Measures.

The execution of HMIS/CMIS monitoring will be completed by the HMIS Lead Agency. All HMIS/CMIS users and HMIS/CMIS-participating subrecipients will be monitored at least annually. All subrecipients required to participate in HMIS or CMIS through CoC or ESG awards may experience delays in reimbursement payments from the recipient for failure to comply with HMIS or CMIS collection and reporting standards until such time that the agency is in compliance.

4.1 Types of Monitoring

4.1.1 Project Compliance

In the last quarter of the calendar year, the recipient performs risk assessments on all subrecipients receiving HUD funding through the recipient. The risk assessment determines each project's capacity to run the project and will inform the monitoring team as to what risk is posed. Each agency, regardless of risk assessment score, will receive an on-site monitor.

CoC Risk Assessments – Each CoC project will be evaluated on the following criteria outlined in the Risk Assessment:

- Agency Experience: CoC Program
- Agency Experience: HUD Funding
- Staff Capacity: Authorized Staff
- Staff Capacity: Draw Contact Person
- Rent/Lease Program Growth

Written Standards

- Total Grant Spend
- Timely Disbursement
- Spend Within Cost Category
- Ineligible Expenses
- APR Submission
- Unresolved HQS/NSPIRE Deficiencies
- Unresolved Monitoring Findings
- HMIS/CMIS Data Quality
- Household Unit Utilization

ESG Risk Assessments – Each ESG project will be evaluated on the following criteria outlined in the Risk Assessment:

- Agency Experience: ESG Program
- Agency Experience: HUD Funding
- Staff Capacity: Authorized Staff
- Staff Capacity: Draw Contact Person
- Rent/Lease Program Growth (RRH and HP only)
- Total Grant Spend
- Timely Disbursement
- Spend Within Cost Category
- Ineligible Expenses
- Unresolved HQS/NSPIRE Deficiencies
- Unresolved Monitoring Findings
- HMIS/CMIS Data Quality
- Housing Placement (RRH only)
- Bed Utilization (Shelter only)

If during the monitor the recipient identifies a concern or finding, the following will take place:

Concern: A concern is a deficiency in project performance not based on statutory, regulatory, or other program requirements. Required sanctions or corrective actions are not authorized for concerns.

- The recipient will bring the concern to the attention of the subrecipient via formal letter sent by email which will recommend actions to address concerns and/or offer technical assistance.
- Concerns do not require a formal written response to the recipient.

Finding: A finding is a deficiency in a subrecipient's project performance based on material noncompliance with a statutory, regulatory, or program requirements for which sanctions or corrective actions are authorized.

- The recipient will provide documentation via formal letter sent by email. The notification will detail required action to be taken by the subrecipient.

Non-compliance: Failure to provide written response to a finding by the specified deadline may lead to a de-obligation of funds. However, upon receipt of the notice of de-obligation, the subrecipient has thirty (30) days to submit a formal letter of appeal. The agency must:

- Submit the appeal on agency letterhead, addressed to the recipient.

- Present a high level of detail and explanation and must include corresponding documentation addressing the corrective action that was found to be deficient.
- The recipient will consult with the HIC prior to taking de-obligation actions.

4.1.2 HMIS/CMIS Privacy and Security Monitoring

HMIS and CMIS monitoring is designed to ensure compliance with privacy and security standards for personal information collected, stored in, or reported from HMIS or CMIS. The HMIS Lead agency performs annual on-site monitoring for all CoC and ESG subrecipients participating in HMIS/CMIS in Idaho. Initial monitoring notices are sent to subrecipients in the first quarter of each calendar year. The audit follows the HMIS Lead Agency's Monitoring Process and Procedures document.

4.2 Recordkeeping

Financial and participant records must be established and maintained to demonstrate that CoC and ESG requirements are being met. There is an additional requirement to develop and implement written policies for recordkeeping that comply with the provisions established under 2 CFR 200. Documentation of participant eligibility, financial records, and assistance provided must be retained according to the timeline identified in each project grant agreement. Proper recordkeeping of financial and participant records will be monitored by the recipient during annual monitoring of projects.

4.2.1 ESG Recordkeeping

ESG Subrecipients must retain all records pertaining to each fiscal year of ESG funds as outlined in their respective grant agreements and abide by 24 CFR § 576.500 - Recordkeeping and reporting requirements. All records pertaining to each fiscal year of ESG funds must be retained for the greater of 5 years (or the periods specified below) as outlined in the ESG grant agreement. Copies made by microfilming, photocopying, or similar methods may be substituted for the original records.

- Documentation of each project participant's qualification as a family or individual at risk of homelessness or as a homeless family or individual and other project participant records must be retained, as outlined in the grant agreement, after the expenditure of all funds from the grant under which the project participant was served; and
- Where ESG funds are used for the renovation of an emergency shelter involves costs charged to the ESG grant that exceed 75% of the value of the building before renovation, records must be retained until 10 years after the date that ESG funds are first obligated for the renovation; and
- Where ESG funds are used to convert a building into an emergency shelter and the costs charged to the ESG grant for the conversion exceed 75% of the value of the building after conversion, records must be retained until 10 years after the date that ESG funds are first obligated for the conversion.

Project participant records must be kept for each participant that documents:

- The services and assistance provided to that participant, including, as applicable, the security deposit, rental assistance, and utility payments made on behalf of the participant; and
- Compliance with the applicable requirements for providing services and assistance to that participant under the project components and eligible activities provisions at 24 CFR § 576.101

Written Standards

through 24 CFR § 576.106, the provision on determining eligibility and amount and type of assistance at 24 CFR § 576.401(a) and (b), and the provision on using appropriate assistance and services at 24 CFR § 576.401(d) and (e); and

- Where applicable, compliance with the termination of assistance requirement in 24 CFR § 576.402.

Compliance with HUD's ESG (24 CFR § 576) requirements for:

- Shelter and housing standards
- Conflict of interest
- Homeless participation
- Faith-based activity
- Nondiscrimination, equal opportunity, and affirmative outreach
- Uniform administrative rules (2 CFR 200)
- Environmental review
- Lobbying and disclosure (2 CFR 200)
- Displacement, relocation and acquisition
- Procurement (2 CFR 200)
- Project participant records are kept secure and confidential
- Participation in HMIS or CMIS

Financial records shall include:

- Supporting documentation for all costs charged to ESG.
- Documentation showing ESG funds were spent on allowable costs in accordance with the requirements for eligible activities and cost principles.
- Documentation of receipt and use of program income.
- Documentation of the receipt and use of matching funds.
- Copies of procurement contracts.

Confidentiality - Subrecipients must develop and implement written procedures to ensure:

- All records containing personally identifying information (as defined in HUD's standards for participation, data collection, and reporting in a local HMIS) of any individual or family who applies for and/or receives ESG assistance will be kept secure and confidential.
- The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under the ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter.
- The address or location of any housing of a program participant will not be made public, except as provided under a preexisting privacy policy of the recipient or subrecipient and consistent with state and local laws regarding privacy and obligations of confidentiality.

The confidentiality procedures of subrecipients must be maintained in writing and must be maintained in accordance with Policies and Procedures.

4.2.2 CoC Recordkeeping

Subrecipients may keep files electronically and must be able to print them out upon request or allow them to be viewed as part of an on-site or remote monitoring or audits. Additionally, if subrecipients use an electronic system, they must provide an adequate back-up system for the files and ensure privacy protections that adhere to other federal privacy regulations, such as HIPAA

Written Standards

(Health Insurance Portability & Accountability Act). There is no required timeframe for the amount of time you need to store hard files as long as the above requirements are met for your electronic files.

- Program participant records must be retained, as outlined in the grant agreement, after the expenditure of all funds from the grant under which the project participant was served, unless CoC funds are used for acquisition, new construction or rehabilitation of a project site. In the case of the latter, records must be retained until 15 years after the date that the project site is first occupied, or used, by participants.

Minimum standards shall ensure sufficient written records are established and maintained to enable the recipient and HUD to determine whether CoC requirements are being met and comply with 24 CFR § 578.103.

CoC records shall include the following documentation related to establishing and operating a Continuum of Care:

- Evidence that the HIC board selected meets the requirements of 24 CFR § 578.5(b).
- Evidence that the HIC has been established and operated as set forth in subpart B of 24 CFR § 578 including published agendas and meeting minutes, and approved Governance Charter that is reviewed and updated annually, a written process for selecting a board that is reviewed and updated at least every five years, evidence required for designating an HMIS Lead for the HIC, and monitoring reports of subrecipients.
- Evidence that the recipient has prepared the HUD application for funds in accordance with 24 CFR § 578.9.

Project participant written records shall include:

- Determination and verification/certification that the project participant met the criteria for being homeless or at risk of homelessness and that an effort was made to obtain written third-party verification, when possible and applicable.
- For CoC-funded projects, acceptable evidence of homeless status as set forth in 24 CFR § 578.3.
- Determination and verification/certification that the project participant was eligible or ineligible for the particular services and/or financial assistance.
- Determination and verification/certification that the project participant lacked sufficient resources and support networks to provide the assistance.
- Determination and verification/certification that the project participant met income requirements and that an effort was made to obtain written third-party verification, when possible and applicable. This includes annual documentation of income for each project participant who receives housing assistance where rent is paid by the project participant.
- Determination and verification/certification that the only households served through permanent supportive housing meet HUD's requirements of having a family member be a person with disabilities.
- Identification of the specific services and financial assistance amounts that were provided to the project participant.
- When applicable, verification that the services were terminated in compliance with 24 CFR § 578.91.
- When adopted by the HIC, a copy of the HIC-approved centralized or coordinated assessment of the project participant.

Written Standards

- Copies of written leases and rental agreements, documentation of payments made, including dates of occupancy, and compliance with fair market rent, rent reasonableness, and utility allowance requirements.
- Determination and verification that the housing unit met HUD's habitability and lead-based paint standards.
- Copy of individualized housing stability plan.
- Notes verifying case management services were provided at least monthly, unless exempt from this requirement.
- Notes verifying the project participant's eligibility was re-evaluated at least every 3 months for homelessness prevention services or at least annually for rapid rehousing services.
- Notes verifying the project participant was assisted to obtain necessary mainstream and other resources.
- Project policies and procedures shall indicate that services are coordinated with Continuum(s) of Care, other homelessness assistance/prevention programs, and mainstream service and assistance programs.

Compliance with HUD's CoC (24 CFR § 578) requirements for:

- Shelter and housing standards
- Conflict of interest
- Homeless participation
- Faith-based activity
- Nondiscrimination, equal opportunity, and affirmative outreach
- Uniform administrative rules (2 CFR 200)
- Environmental review
- Lobbying and disclosure (2 CFR 200)
- Displacement, relocation and acquisition
- Procurement (2 CFR 200)
- Project participant records are kept secure and confidential
- Participation in HMIS or CMIS

Financial records shall include:

- Supporting documentation for all costs charged to the CoC grant.
- Documentation showing CoC funds were spent on allowable costs in accordance with the requirements for eligible activities and cost principles.
- Documentation of receipt and use of program income.
- Documentation of the receipt and use of matching funds.
- Copies of procurement contracts.

Subrecipients will submit participant records to the recipient at the end of the grant, if the grant is not renewed, or if the subrecipient terminates the grant.

5. Systemwide Performance

5.1 Performance Measurement

The HMIS Lead Agency will be charged with generating, reporting, and making available the System Performance Measures reports for the CoC. These measures will include at minimum:

- Length of time persons remain homeless.
- Exits to permanent Housing with Returns to Homelessness.
- Number of persons experiencing homelessness.
- Employment and Income Growth for CoC-funded projects.
- Number of Persons Experiencing First-Time Homelessness.
- Homelessness Prevention and Housing Placement of Persons Defined by Category 3 of HUD's Homeless Definition in CoC-funded projects (not applicable at this time); and
- Permanent Housing Placement/Retention.

The purpose of these measures is to provide a more complete picture of how well Idaho communities within the Balance of State CoC are preventing and ending homelessness. The performance measures are interrelated and, when analyzed relative to each other, provide a more complete picture of system performance. Evaluation of the measures will aid in identifying opportunities to improve system performance and achieve the goals outlined in HUD's federal strategic plan. In addition, this data will be used to inform our decision making in regards to setting goals and implementing strategies locally. Data accuracy and completeness is a crucial to accurately reporting on and assessing the progress of these measures. Data quality standards are detailed in Appendix B of the HMIS Governance Agreement.

5.2 Roles and Responsibilities

To maximize the Continuum's strategic response to the system performance measures described herein and to ensure efforts towards improved system efficiencies and desirable outcomes, Committees will be assigned the following roles and responsibilities.

Informing Idaho: The accuracy and completeness of system performance measures identified above can be greatly impacted by the completeness and quality of data used to produce said reports. The primary role of the Informing Idaho Committee will be to promote and monitor consistent data entry that is timely, complete, and of high quality, and when necessary, work towards improved entry in these areas. It will be the responsibility of the Committee to review data entry reports on at least a quarterly basis and use those reports to generate actionable plans to address any concerning patterns or outcomes. Informing Idaho will coordinate with other agencies and data sources to provide a comprehensive picture of clients, services, and unmet needs within the CoC.

Housing Idaho: The primary role of the Housing Idaho Committee is to monitor the Balance of State CoC's effort towards meeting the federal strategic goals to end homelessness and to institute strategies to meet both federal and local goals related to the reduction of homelessness. In its effort to do so, the Committee will regularly monitor reports generated from HMIS that provide linkages to the System Performance Measures, which will indicate whether systems goals are being met and whether homelessness responses are successful. It is the Committee's responsibility to interpret report data and outcomes and respond to system improvements identified. The Committee will work with other advisory groups within the CoC as well as Regional Coalitions to formulate the strategies presented to Guiding Idaho for adoption. System-wide targets for each measure will be reviewed, and adjusted, if necessary, on an annual basis.

Engaging Idaho: Engaging Idaho is responsible for communication, engagement, and participation in and for the HIC. The Engaging Idaho Committee will ensure that communication and education on the system performance measures are taking place at the Regional Coalitions. Furthermore, the

Committee, in partnership with the Regional Coalitions will create and perform outreach efforts to non-HUD funded projects and partners in the community to solicit feedback on system improvements. Engaging Idaho coordinates with community resource providers to promote awareness of available programs with the intent of increasing opportunities for homeless, and those at-risk of homelessness, to access the services they need. Engaging Idaho also oversees the two standing Advisory Boards: the Youth Advisory Board (YAB) and the Lived Experience Panel (LEP).

Regional Coalitions: These regional advisory groups will share system performance measure reports with the general membership of the Coalition. Regional Coalitions will respond to the requests from other HIC committees to provide detailed insight into factors that may positively or negatively influence the outcomes reported. Regional Coalitions will receive technical assistance from the Collaborative Applicant when necessary.

5.3 Strategy

5.3.1 Measure #1

Length of time persons remain homeless. This measures clients' average and median length of homelessness in emergency shelter and/or transitional housing. This includes number of times experiencing homelessness as well as prior stays during the report range. This measure will be used for system performance planning each year to understand how the system has been influenced by outreach, Housing Focused practices, coordinated entry, and resource availability.

Goal: Demonstrate a reduction in the average and median length of time persons enrolled in emergency shelter, safe haven, or transitional housing projects experience homelessness.

Desired Outcome: Reduction in the average and median length of time persons remain homeless.

5.3.2 Measure #2

Exits to Permanent Housing with Returns to Homelessness. This measures clients who exited ES, TH, or PH to a permanent housing destination in the date range, plus two years prior. Of those clients, the measure reports on how many returned to homelessness as indicated in the HMIS system for up to two years after their initial exit. This will be used to evaluate which populations of persons experiencing homelessness struggle to maintain permanent housing after accessing homelessness services.

Goal: Demonstrate a reduction in the percent of persons who have left homelessness (i.e., exited Continuum projects into permanent housing destinations) and who return to homelessness (i.e., return to Continuum projects for which homelessness is an eligibility criterion).

Desired Outcome: Reduction in the percentage of persons who return to homelessness.

5.3.3 Measure #3

Number of Homeless Persons. This measures the change in sheltered and unsheltered persons in the PIT Count and sheltered persons in HMIS. By monitoring this, the CoC will have a general sense of how the total number of homeless individuals within the CoC is trending, specifically whether the total count is declining. The CoC will also construct an estimate of resources needed throughout the geographic area, including the placement of those resources. Targets for this measure will be reviewed and adjusted each year to ensure the CoC is continually moving towards achieving the goals of HUD's federal strategic plan to end homelessness.

Goal: Demonstrate a reduction in the number of homeless individuals and families identified in the Point-In-Time sheltered and unsheltered counts and annual sheltered data from HMIS for the CoC over time.

Desired Outcome: Reduction in the number of persons who are homeless.

5.3.4 Measure #4

Employment and Income Growth for CoC-Funded Projects. This measures changes to income (earned income, non-employment income, and total income) by adult “stayers” (adult clients active in a project as of the last reporting day) and adult “leavers” (adult clients who exited during the reporting period). Regional coalitions should ensure that all CoC-funded agencies are connected to local resources, leveraging services and resources, and using SOAR.

Goal: Demonstrate what percentage of homeless adults being served in CoC projects increase their earned income (e.g., employment) and/or other income between their enrollment in the system and their exit (or follow up assessment).

Desired Outcome: Increase in the percentage of adults who gain or increase employment or non-employment cash income over time.

5.3.5 Measure #5

Number of Persons First-Time Homeless. This measures the change in active persons in ES, SH, and TH as well as in ES, SH, TH, and PH with no prior enrollments in HMIS. This measure will assist in evaluating the impact of initiatives meant to reduce length of time homeless and episodes of homelessness (e.g., Housing Focused, coordinated entry, outreach, etc.). This measure should be evaluated in conjunction with assessments collected by the Coordinated Entry System.

Goal: Demonstrate a reduction in the number of persons experiencing homelessness for the first time.

Desired Outcome: Reduction in the number of persons who become homeless for the first time.

5.3.6 Measure #6

Homelessness Prevention and Housing Placement of Persons Defined by Category 3 of HUD’s Homeless Definition in CoC Program-funded Projects. The CoC is not currently authorized to serve “Homeless Under Other Federal Statutes” (§ 578.3) meaning unaccompanied youth under 25 years of age, or families with Category 3 children and youth who do not otherwise qualify as homeless under this definition, but who: are defined as homeless under the other listed federal statutes; have not had a lease, ownership interest in permanent housing during the 60 days prior to the homeless assistance application; have experienced persistent instability as measured by two moves or more during in the preceding 60 days; and who can be expected to continue in such status for an extended period of time due to special needs or barriers (24 CFR 578.89).

5.3.7 Measure #7

Permanent Housing Placement/Retention. This measures the change in exits to permanent housing or the retention of permanent housing. The outcomes will demonstrate adherence to Housing Focused principles, availability of permanent housing, and the extent to which services are successfully deployed, among other system components. These insights will be used to effect system change and educate other resource allocators on homelessness assistance needs.

Goal: Demonstrate an increase in the persons served in street outreach, emergency shelter, safe haven, transitional housing, permanent housing, or rapid rehousing projects that retain permanent housing or exit to permanent housing destinations.

Desired Outcome: Increase the number of persons who exit to, or retain, permanent housing.

5.4 Governance

The recipient, on behalf of the HIC, will communicate with the HMIS Lead Agency to assure the generation and presentation (when necessary) of System Performance Measures and correlating reports reviewed by the Informing Idaho Committee, Guiding Idaho Committee, and the HIC. Special report requests that have not been identified as ongoing and reoccurring will be fulfilled by the HMIS Lead Agency within 30 days or sooner when possible. However, should requested reports require system development to be performed by the vendor of the HMIS/CMIS or comparable database software, the HMIS Lead Agency will not be expected to produce said report within 30 days. They must, however, provide a status report on the progress of the development work within 30 days.

5.5 Strategic Resource Allocation

The purpose of the HUD McKinney-Vento homeless assistance programs is to reduce the incidence of homelessness in communities by assisting individuals and families experiencing homelessness to quickly transition into permanent housing and self-sufficiency, and to assist eligible households who are at imminent risk of homelessness from becoming homeless. It is the expectation of HUD that programs funded through the McKinney-Vento homelessness programs be evaluated annually to ensure goals and objectives set by the HIC are met. In order to be consistent with 402(f) and 413(b) of the McKinney-Vento Act, ESG recipients must also consult with HIC in developing performance standards and evaluating the outcomes of ESG-assisted projects; and the HIC must in turn analyze patterns of use of ESG funds and help evaluate outcomes for ESG-funded projects.

Guiding Idaho has created goals to help CoC and ESG subrecipients meet certain objectives of HUD and the HIC. A project review process will be used to evaluate subrecipient performance of both federal and HIC goals. Evaluations will be assessed at least annually, and the timing of the project achievements will be completed in conjunction with HUD's CoC annual funding application, and for ESG, the Consolidated Annual Performance Report (CAPER).

The CoC Application Score Card will be completed for each McKinney-Vento project funded within the HIC. This score card will act as a performance evaluation tool and will indicate program achievement. Points are allocated for each question, ranging from zero to ten points, depending on the question. Overall project achievement will be assessed based on the total score of the assessment.

The recipient, on behalf of the HIC, participates in the ESG program's annual action plan, which includes the ESG funding allocation methodology. For information regarding ESG scoring allocations, consult the recipient, Idaho Housing and Finance Association, or the Consolidated Plan. The ESG recipient will provide status reports to Guiding Idaho at least annually.

5.5.1 CoC Review and Ranking

CoC applications are scored competitively at both a national and local level. Nationally, HUD requires projects be ranked within either Tier 1 or Tier 2 to enforce competitive and strategic grant

awards. Projects ranked in Tier 2 continue to be at greater risk of not receiving renewal funding. Locally, the HIC must determine the manner in which projects will be scored and the order in which they will be ranked for the CoC application. The recipient has been given application generation and review oversight responsibilities. Upon the expiration of the local application deadline for new and renewal projects, a preliminary review of each application will be completed by the recipient, which includes:

- Confirming the application was submitted on time
- Confirming application threshold requirements were met
- Confirming all required attachments were submitted with the application
- Confirming match and/or leverage requirements are met

5.5.2 Performance Goals

The local CoC application aims to enforce the adoption of federal and local strategies and goals intended to:

- Reduce lengths of episodes of homelessness
- Reduce new and return entries into homelessness
- Increase income growth, including debt to income ratio
- Reduce first-time homelessness
- Increase permanent housing retention
- Reduce the number of those homeless

5.5.3 Reallocations or Repurposing of CoC Funds

Upon the completion of renewal project application scoring, projects will be ranked in score order, highest to lowest. A threshold will be established in alignment with the percentage HUD uses to define Tier 2 ranking. Each CoC competition, a certain percentage of projects will fall into Tier 2 status, which could affect their funding level. An Independent Review Panel (IRP) will have access to all applications and will make recommendations on project ranking from to the recipient based on risk of funding loss for the CoC, quality of application, performance, history of compliance, and community resource needs. The recipient will then consolidate the application scores and offer the HIC options from which to make decisions on ranking.

Tier 2 ranked projects that are included in the HIC's priority ranking and are awarded renewal funding may be required to develop a 12-month action plan for improving project performance in the area(s) identified on the score card. Projects may be required to provide quarterly progress reports to the recipient, who will assess the project performance at the end of the 12-month period and will determine if the project is improving in the areas identified and meeting federal and local goals. If the project performance has not improved significantly or fails to meet the HIC expectations, the project will likely be at risk for reallocation or reassignment.

Project reassignment will occur through recommendation by the recipient and will be recommended if a project is not performing up to federal and local expectations, and if there is an opportunity to improve performance and meet local and federal needs by changing the project model. Reassignment would mean working with the project and the local HUD office to reclassify the project from one project model to another or to physically reassign it to a higher performing subrecipient. For example, a rapid rehousing project could be converted, or repurposed, to become a permanent housing project. The recipient would work closely with project staff and the

local HUD office on the reassignment plan and the timeline for completion of the reassignment and would be contingent upon HUD approval.

If a subrecipient chooses to decline or refuse reassignment, funds will be diverted into a general pool which will be made available in a competitive solicitation for subrecipients to use at the HIC's direction and consistent with the eligible activities described in the NOFO/NOFA. If there are not enough new applications received to replace the project, the project may be funded, but with an action plan to improve performance with HIC approval.

5.5.4 New Projects

Funding for new projects, including through reallocation, is limited to Permanent Housing and Supportive Services Only for Coordinated Entry projects. Transitional housing and other supportive services only projects will not be accepted.

New project applications will be scored and ranked based on the following criteria:

- Demonstrated ability to comply with HUD, CoC application, and HIC requirements
- Demonstrated ability to accurately and appropriately execute fiscal management, including match and leverage funds
- Demonstrated experience administering and complying with current and prior HUD-funded projects (no adverse findings in performance)
- Proposed activities meet a homelessness/housing need identified as an HIC priority
- Capable and willing to participate in HMIS/CMIS or comparable database, including adherence to HUD, HMIS Lead and HIC standards, and comply with Coordinated Entry requirements
- Willingness to operate the project using Housing Focused practices and philosophy as described in this document

5.5.6 Application Process

Upon HUD issuance of the CoC NOFO/NOFA, or the Program Registration if sufficient information is detailed therein, the recipient will establish a timeline for the completion of the CoC program's project applications. At a minimum, this timeline will be based on the inclusion and completion of the following activities:

5.5.6.1 Application

The recipient will create competitive applications (new and renewal) based on HUD preferences presented in the NOFO/NOFA. The application will be created with the purpose of measuring performance in an objective and outcome-based manner to allow for the identification of under-performing projects or inefficient use of funds.

5.5.6.2 Solicitation

The applications should be accompanied by clear instructions, deadlines, and expectations. New projects will include relevant program and component type descriptions for each eligible project type identified. New project applications will be released once availability of funds, eligible project types, and target populations have been identified from the NOFO/NOFA. Project application solicitations will be posted to the recipient's website. The notification of the availability of new or reallocated funds will be broadcast through various stakeholder channels.

5.5.6.3 Review Panel

Participation in the IRP will be requested through Regional Coalitions, email distribution, and the recipient's website. IRP panelists will assist in the review and scoring of renewal and new project applications. Should the number of volunteers be deficient, recipient staff will assist in the review and scoring of applications (only as a last resort). IRP activities will include a reconciliation session upon the completion of individual scoring to promote consistency in scoring outcomes. Individuals and agencies affiliated with an organization or grant funded by the CoC program or individuals or agencies with influence over or otherwise connected to an organization or grant funded by the CoC program may not participate in the IRP.

5.5.6.4 Application Briefing

The recipient will conduct a briefing that will provide an overview of HUD and HIC strategy and scoring criteria, eligible activities for new projects, application completion, and the timeline for completion and award announcements. This will be made available to all parties interested in applying for funds.

5.5.6.5 Project Priority Listing

The project priority listing will consist of the HIC's ranking of new and renewal CoC projects. This ranking will be based on application score, threshold standards, project component type, and ranking options presented to the HIC. Project proposals that do not meet the criteria identified in the application will not be ranked. IRP and recipient recommendations will be utilized by the HIC in order to decide which projects will be included in the CoC's Project Priority Listing. Due to the extremely vital nature of the activities associated with HMIS and Coordinated Entry projects, they will automatically be ranked at the top of the CoC's Priority Listing, regardless of their new or renewal status.

5.5.6.6 Funding Announcements

Applicants will be made aware of their inclusion status in the CoC's Project Priority Listing in writing by the notification deadline imposed by HUD in the NOFO/NOFA.

6. Coordinated Entry

6.1 Purpose

The goal of the HIC is, in collaboration with the recipient, the HMIS Lead Agency, and the Boise City/Ada County CoC (including BC/AC CoC's Coordinated Entry System), to prevent and end homelessness within the HIC's geographic area. The Coordinated Entry system was developed in accordance with HUD regulations, which define a coordinated entry system as "a centralized or coordinated process designed to coordinate program participant intake, assessment, and provision of referrals across a geographic area. The system covers the geographic area (designated by the CoC), is easily accessed by individuals and families seeking housing or services, is well advertised, and includes a comprehensive and standardized assessment tool" (24 CFR § 578.3). It is the responsibility of the HIC to implement Coordinated Entry in their geographic area.

Coordinated Entry creates a front door to Idaho's many organizations working to end homelessness for single adults, youth, and families. The system encompasses five participant-centered components:

- **System Access:** ensure that all people experiencing a housing crisis have fair and equal access to Coordinated Entry
- **Assessment:** providers quickly identify and assess persons seeking assistance using standardized, communitywide tools
- **Prioritization:** those with the most severe service needs and highest level of vulnerability are prioritized, while all are connected to housing and homelessness assistance based on their strengths and needs as quickly as possible
- **Housing Referral:** persons are referred to available HIC housing resources and services in accordance with the HIC's documented prioritization guidelines
- **Accountability:** all subrecipients support and align with common goals and a shared framework

6.2 Guiding Principles

The establishment and continued governance of a uniform and collaborative system must be founded upon consistent shared principles. The HIC has adopted the following guiding principles to focus the efforts and activities of the Coordinated Entry system:

- **Easy, Fair, and Equal Access:** Access Points will ensure the system is as easy to navigate as possible and that all households have fair and equal access to the Coordinated Entry process, regardless of where or how they present for services. The process for accessing help will be well advertised to participants and service partners. Access Points will be accessible to people with disabilities and provide interpretation services for persons with Limited English Proficiency (LEP). Allocation of resources is strategy-oriented, intentional and determined by performance outcomes and population location, size, and needs.
- **Housing Focused Orientation:** Households are referred without preconditions or service participation requirements. To the extent possible, housing placements are based on need and offered as quickly as possible.
- **Inclusivity:** All subpopulations, including those experiencing chronic homelessness, veterans, families, youth, LGBTQIA+, survivors of domestic violence, immigrants, and refugees are served.
- **Informing Local Planning:** Access Point staff share information gathered through the Coordinated Entry process in Regional Coalition meetings, which is used by the coalition to guide homeless assistance planning and system change efforts in the region. Decisions are based on data, evidence, accountability, and assessment, and used to determine the type and extent of needs of the community.
- **Low Barrier:** The Coordinated Entry process does not screen people out for assistance because of perceived barriers to housing or services, including, but not limited to, lack of employment or income, active or history of substance use, domestic violence history, or having a criminal record.
- **Outcome Oriented:** First-time homelessness, length of time homeless and returns to homelessness are reduced by providing the most needed and appropriate services to the most vulnerable participants. AP staff and housing providers are committed to referral success by supporting the safe transition of participants from emergency shelter or unsheltered status to housing.
- **Participant Choice:** The Coordinated Entry system seeks to provide households the most appropriate care by giving them choice, including location and type of housing, level of services, the amount of personal information shared and who can access that information.

- **Person-Centered:** System processes are dignified, empathetic, responsive, and support self-determination, with a focus on offering services that fit specific needs. Access Points will reduce the stress of the experience of being homeless by limiting assessments and interviews to only the most pertinent information necessary to resolve the participant's immediate housing crisis.
- **Referral Protocols:** The referral process is clearly defined to ensure participants will be able to easily understand to which program they are being referred. Housing providers and Access Point staff collaborate to ensure that eligible households are referred and accepted, limiting the need for participants to identify alternate project placements.
- **Trauma-Informed:** Assessment tools and delivery protocols are sensitive to the participant's lived experience, seek to minimize risk and harm, and respond to the effects of trauma. Tools and training are regularly evaluated to ensure the system is equipped to respond to changing circumstances and improve how it accommodates trauma survivors.

6.3 System Participation

All subrecipients receiving HUD funding must participate in the Coordinated Entry system and are required to use Coordinated Entry as the only referral source from which to fill vacancies in housing and/or services funded by CoC and ESG programs, with emergency shelters being the sole exception. Subrecipients are expected to participate in regional Case Conferencing facilitated by local Access Point agencies to coordinate referrals and remain informed about Coordinated Entry services and eligibility guidelines. The Coordinated Entry Policies and Procedures detail all other Coordinated Entry requirements for participating organizations.

7.1: GLOSSARY OF TERMS

Below is a list of federal, state, and local terms that appear throughout HIC documents. When an official HUD or other federal partner definition of a term exists, partners are encouraged to use that definition, in lieu of creating their own. HUD definitions are *italicized*.

Access Point (AP): Subrecipient selected to provide a designated location that serves as a point of entry for Coordinated Entry services where individuals and families experiencing homelessness can begin the process of being assessed and connected to housing and support services.

Access Point Director: Person who oversees the day-to-day operations and implementation of the Coordinated Entry (CE) system in their designated region. Responsible for staff training and development, data quality, oversight of referrals, management of the queue, facilitating case conferences, assisting with grievance and appeals processes, and submitting CE monitoring reports.

Access Point Subcommittee: A subcommittee of the Engaging Idaho Committee made up of the Access Point Directors from all regions, the Coordinated Entry Administrator, and the HMIS Lead staff. Meets quarterly, at a minimum, to discuss Access Point concerns and recommendations for system improvement.

Administrative Agency: A role required by HUD and selected by the HIC to assist with administrative duties. Provides technical assistance, training, and oversight for the HIC.

Agency: Any organization providing services to eligible homeless or near homeless persons. Agencies using the HMIS are also referred to as “Service Providers”.

Annual Homelessness Assessment Report (AHAR): HUD’s annual report that provides Congress with detailed information on individuals and households experiencing homelessness across the country each year. Compiled from data collected from the Longitudinal System Analysis and the Point In Time Count.

Assessment: *One or more standardized tool(s) to determine a household’s current housing situation, housing and service needs, risk of harm, risk of future and continued homelessness, and other adverse outcomes.*

At-risk of Homelessness: *An individual or family who has income below 30% of area median family income for the area, as determined by HUD, and who does not have sufficient resources or support networks immediately available to prevent them from moving into an emergency shelter or another place described in the “homeless” definition and meets one of the following definitions defined under 24 CFR 578.3 (CoC program) or 24 CFR 576.2 (ESG program). This may also include a child or youth who qualifies as homeless under other Federal programs.*

Balance of State (BoS): The geographic area within a state that is not covered by other, more localized CoCs. Represents the areas of a state that are not part of a defined urban or metropolitan CoC. In Idaho, the balance of state means all Idaho counties, with the exception of Ada County, which is a different CoC called Our Path Home.

Case Conference: A regularly planned, formal and structured meeting to provide coordinated and integrated discussions among Coordinated Entry Service Providers and Mainstream Service

Providers regarding individual housing placements for participants at the top of the prioritization queue and diversion strategies for lower-priority participants.

Chronic Homelessness: (1) A “homeless individual with a disability,” as defined in Section 401(9) of the McKinney-Vento Homeless Assistance Act, who: Lives in a place not meant for human habitation, a Safe Haven, or an emergency shelter; AND has been homeless continuously for at least 12 months or on at least four separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described. (2) An individual who has been residing in an institutional care facility, including jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria of this definition before entering that facility, or (3) A family with an adult head of household (or, if there is no adult in the family, a minor head of household) who meets all of the criteria of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

CoC Board: See “Guiding Idaho Committee”.

Collaborative Applicant (CA): The eligible applicant designated by the CoC to collect and submit the CoC Registration, CoC Consolidated Application (which includes the CoC Application and CoC Priority Listing), and apply for CoC planning funds on behalf of the CoC during the CoC Program competition.

Community Management Information System (CMIS): An information system developed and administered by IHFA on behalf of the state’s Domestic Violence (DV) Service Providers. DV providers are prohibited to enter DV client information into HMIS. Fulfills the requirements for a comparable database while simultaneously providing reporting support for information required by HUD.

Comparable Database: HUD prohibits Domestic Violence (DV) providers from entering data on their clients into HMIS, yet federally funded DV providers are required to use a comparable database to collect and report on universal and program-specific data elements. The CMIS developed and administered by IHFA provides this functionality for the state’s DV providers.

Consolidated Annual Performance and Evaluation Report (CAPER): An annual performance report used to show the overall impact of the ESG. The CAPER shows overall accomplishments by relating financial expenditures, client level data, and subrecipient information to HUD.

Continuum of Care (CoC): A collaborative funding and planning approach that helps communities plan for and provide, as necessary, a full range of emergency, transitional, and permanent housing and other service resources to address the various needs of homeless persons. HUD also refers to the group of service providers involved in the decision making processes as the “Continuum of Care”.

Continuum of Care (CoC) Program: A HUD funding source to (1) promote communitywide commitment to the goal of ending homelessness; (2) provide funding for efforts by nonprofits, states, and local governments to quickly rehouse homeless individuals and families, while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; (3) promote access to and effect utilization of mainstream programs by homeless individuals and families; and (4) optimize self-sufficiency among individuals and families experiencing homelessness.

Coordinated Entry (CE): *A centralized or coordinated process designed to coordinate program participant intake, assessment, and provision of referrals across a geographic area. The system covers the geographic area (designated by the CoC), is easily accessed by individuals and families seeking housing or services, is well advertised, and includes a comprehensive and standardized assessment tool.*

Coordinated Entry Administrator: The dedicated staff member provided by the Collaborative Applicant, responsible for the day-to-day management and administration of the Coordinated Entry System, training of Access Point staff, and monitoring system performance.

Coordinated Entry Lead Agency: IHFA is the entity responsible for monitoring grant subrecipients and Access Points on compliance with all Coordinated Entry requirements, including adherence to civil rights and fair housing laws and regulations. This agency is required by HUD and selected by the HIC.

Database: An electronic system for organizing data which can be easily searched and retrieved.

Data Quality Framework Report: A report which lists errors and error rates for collected data elements as well as timeliness metrics.

Disability: See “Disabling Condition”.

Disabling Condition: *A physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury, which is expected to be of long-continued and indefinite duration, substantially impedes the person’s ability to live independently, and is of such a nature that such ability could be improved with more suitable housing conditions; a developmental disability as defined in Section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000; or Acquired immunodeficiency Syndrome (AIDS) or any conditions arising from the etiologic agent for Acquired Immunodeficiency Syndrome, including infection with the Human Immunodeficiency Virus (HIV).*

Diversions: A strategy that prevents homelessness for people seeking shelter by helping them identify immediate alternate housing arrangements and, if necessary, connects them with services and financial assistance to help them return to permanent housing.

Domestic Violence (DV) Service Provider/Victim Service Provider (VSP): A private nonprofit organization whose primary mission is to provide services to survivors of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, battered women’s shelters, DV transitional housing programs, and other programs.

Emergency Shelter (ES): *Any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements.*

Emergency Solutions Grant (ESG) Program: A HUD funding source designed to support sheltered and unsheltered homeless persons, as well as those at risk of homelessness, by providing the services necessary to help those persons to regain stability quickly in permanent housing after experiencing a housing crisis and/or homelessness.

Emergency Transfer Plan (ETP): *A process for transferring a tenant in CoC- or ESG-funded housing to a new, safe housing unit if their current housing has become unsafe due to threat of imminent harm if they remain in their current housing or the tenant is a victim of sexual assault and*

reasonably believes there is a threat of imminent harm from further violence if they remain in their current housing or the sexual assault occurred on the premises during the 90-calendar-day period preceding the date of their transfer request.

Engaging Idaho Committee: The committee responsible for communication, engagement, and participation in and for the HIC. It coordinates with community resource providers to promote awareness of available programs with the intent of increasing opportunities for homeless individuals, and those at-risk of homelessness, to access the services they need. The committee oversees Coordinated Entry and the two standing Advisory Boards: the Youth Action Board and the Lived Experience Panel.

Fair Market Rent (FMR): The rental rates published in the Federal Register annually by HUD.

Family: All persons living in the same household who are related by birth, marriage, or adoption, or consider themselves a family unit.

Family and Youth Services Bureau (FYSB): An office within the Administration for Children and Families that supports organizations that work to promote youth well-being, prevent and end youth homelessness, and support a holistic adolescent approach.

Guiding Idaho Committee: The committee that serves as the Executive Board of the HIC. It provides governance for the HIC and serves as the Chair at the HIC full membership meetings.

Head of Household (HoH): The adult member of the household who is designated by the family as the head for purposes of determining income eligibility and rent.

Homeless:

- **Literally Homeless (Category 1):** *An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: (i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground; or (ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or (iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.*
- **Imminent Risk of Homelessness (Category 2):** *An individual or family who will imminently lose their primary nighttime residence, provided that: (i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance; and (ii) No subsequent residence has been identified; and (iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing*
- **Homeless under other federal statutes (Category 3):** *[Not eligible in Idaho]. Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who: (i) Are defined as*

homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a); (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance; or (iii) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.

- **Fleeing/attempting to flee domestic violence (Category 4):** Any individual or family who meets the following criteria: (i) Is experiencing trauma or a lack of safety related to, or fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual's or family's current housing situation, including where the health and safety of children are jeopardized; and (ii) Has no other safe residence; and (iii) Lacks the resources to obtain other safe permanent housing.

Homeless Management Information System (HMIS): The information system used to record, analyze and transmit client and activity data regarding the provision of shelter, housing and services to individuals and families who are homeless or at risk of homelessness in a CoC.

Homeless Management Information System (HMIS) Lead Agency: An organization or government department designated by a CoC to manage and administer the HMIS on behalf of the CoC. Responsible for the day-to-day operation of the HMIS, including data management, reporting, and ensuring compliance with HUD Exchange, as well as providing training and support to users in the system.

Homeless Management Information System (HMIS) Participation Fee: Some providers have a participation fee drawn from their grant. Providers who are defined as "Other Federal Partners" are charged a fee. Tax credit projects which do not use a Service Provider already using HMIS must have the fee paid either by the developer, property manager, or Service Provider.

Homeless Management Information System (HMIS) Vendor: A contractor who provides materials or services for the operation of an HMIS. WellSky is the vendor of ServicePoint, the HMIS software used by the HIC.

Homelessness Prevention (HP): A program targeted to individuals and families at risk of homelessness. Specifically, this includes those who meet the criteria under the "at risk of homelessness" definition at CFR 576.2, as well as those who meet the criteria in Category 2, 3, and 4 of the "homeless" definition and have an annual income below 30% of family median income for the area.

Household: *All persons occupying a housing unit. The occupants may be a family, as defined in 24 CFR 5.403; two or more families living together; or any other group of related or unrelated persons who share living arrangements, regardless of actual or perceived, sexual orientation, gender identity, or marital status.*

House Idaho Collaborative (HIC): A group of agencies and individuals who work collaboratively to share information and resources and provide assistance to prevent and resolve homelessness across all counties in Idaho, with the exception of Ada County, which belongs to the Our Path Home CoC. The HIC's structure includes four committees, the Collaborative Applicant, the Coordinated Entry Lead Agency, the HMIS Lead Agency, and six Regional Coalitions with all of their partner agencies.

Housing Focused: An approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety or treatment. Supportive services are offered to maximize housing stability and prevent returns to homelessness as opposed to addressing predetermined treatment goals prior to permanent housing entry.

Housing Inventory Count (HIC): The point-in-time inventory of projects within a CoC that provides beds and units dedicated to serving persons who are homeless. It is intended to provide HUD and CoCs with information about the shelter and housing capacity of homeless crisis response systems. It should reflect the number of beds and units available on the night designated for the count that are dedicated to serve persons who are homeless (and, for permanent housing projects, were homeless at entry), per the HUD homeless definition.

Housing Project/Receiving Project: A distinct unit of an organization that provides services and/or lodging and is identified by the CoC as part of its service system and that is required to pull referrals from the Coordinated Entry System.

Idaho Balance of State Continuum of Care (BoS CoC): See "House Idaho Collaborative".

Informing Idaho Committee: The committee responsible for data collection, analysis, and reporting body for the HIC. It works in conjunction with the HMIS Lead Agency on projects involving HMIS/CMIS to fulfill requirements for the HIC's HMIS. The committee coordinates with other agencies and data sources to provide a comprehensive picture of clients, services, and unmet needs within the HIC.

Licensed User: Also referred to as "User"; an authorized individual who uses or enters data in an HMIS database.

Lived Experience Panel (LEP): An advisory board made up of individuals with lived experience of homelessness. Members provide their unique perspective and feedback regarding HIC programs, initiatives, and evaluation methodology and help to identify gaps in services within the system.

Longitudinal System Analysis (LSA): An annual report that gives an aggregate analysis of how households move through the homeless response system. Looks at the path of projects households move through and offers statistics on the following measures: length of time homeless, returns to homelessness, and exits to permanent housing. Offers demographic information such as household type, age, race, veteran status, and disability. Shows a visualization of all this data with Stella Performance.

Low Income Housing Tax Credit (LIHTC or Tax Credit): A federal tax credit program that encourages the development and preservation of affordable rental housing. The IHFA tax credit application offers points for Permanent Supportive Housing obligated units and a contractual agreement to use the Coordinated Entry System.

Mainstream Service Provider: An organization that is not funded by CoC or ESG funds that provides necessary housing services and/or related resources or assistance to persons served by Coordinated Entry. Examples include hospitals, mental health agencies, employment assistance programs, and schools.

Non-Public Information (see also “PII”): Information about an individual that is of a private nature and neither available to the general public nor obtained from a public record. Non-Public Information includes without limitation a client’s name, social security number, and other such personally identifiable information.

Participant: An individual about whom a Service Provider collects or maintains protected personal information: (1) because the individual is receiving, has received, may receive or has inquired about assistance from a Service Provider; or (2) in order to identify needs, or to plan or develop appropriate assistance within the HIC.

Permanent Housing (PH): *Community-based housing without a designated length of stay, where formerly homeless individuals and families can live as independently as possible. Includes both Permanent Supportive Housing and Rapid Rehousing.*

Permanent Supportive Housing (PSH): *Permanent housing in which housing assistance and supportive services are provided to assist households with at least one member with a disability in achieving housing stability.*

Personally Identifiable Information (PII): Any information that can be used to identify a particular individual. PII includes, without limitation, a client’s name, social security number, date of birth, and such personally identifying information that identifies directly, indirectly, or by linking with other identifying information to identify a specific individual, or that can be manipulated by a reasonably foreseeable method to identify an individual.

Point In Time (PIT) Count: The one-night count of unsheltered and sheltered homeless persons. The PIT count must occur on one night during the last ten days in January. The HIC is required by HUD to obtain a count of the number of unsheltered and sheltered homeless persons or families in Idaho and report it back to HUD.

Pre-screening: An assessment process designed to assist in identifying individuals and families that are homeless or at risk of homelessness who may be eligible for federal, state or locally-funded assistance and resources.

Prioritization: The Coordinated Entry-specific process by which all persons in need of assistance who are entered on the queue are ranked in order of priority.

Prioritization Queue: List of potentially eligible participants prioritized by chronic homeless status and greatest service needs, utilized to offer housing units as they become available to the participant prioritized highest.

Program Specific Data Elements (PSDE): Data elements, such as domestic violence history, income and sources, non-cash benefit sources, and health insurance sources that recipients of

HUD McKinney-Vento Act program funds are required to collect and enter into the HMIS based on program-specific grant requirements.

Projects for Assistance in Transition from Homelessness (PATH): A Substance Abuse and Mental Health Services Administration (SAMHSA)–funded program to provide outreach and services to people with serious mental illness who are homeless, in shelter or on the street, or at imminent risk of homelessness.

Rapid Rehousing (RRH): Housing relocation and stabilization services and short- or medium-term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing. Assistance may be provided for up to 24 months during any 3-year period, and may include rental arrears for up to six months, to eligible persons who qualify as homeless under Category 1 and 4 of the HUD “homeless” definition.

Reasonable Accommodation: *A change, exception, or adjustment to a rule, policy, practice, or service that may be necessary for a person with disabilities to have an equal opportunity to use and enjoy a dwelling, including public and common use spaces, or to fulfill their program obligations.*

Recipient: An applicant that signs a grant agreement with HUD.

Regional Coalition (RC): A group of organizations and individuals within a specific geographic area that coordinate to assist in the development and implementation of the HIC’s strategies at the local level. RCs are charged with networking with all local relevant agencies, individuals, and supporting programs to accomplish their goals. They are responsible for initiatives related to preventing and ending homelessness, providing supportive services, and increasing affordable housing in their geographic region.

Rent Reasonableness: A process conducted by the recipient or subrecipient to determine if the rent charged for the unit receiving rental assistance is reasonable in relation to rents being charged for comparable unassisted units on the market, taking into account the location, size, type, quality, amenities, facilities, and management and maintenance of each unit. Reasonable rent must not exceed rents currently being charged for comparable unassisted units.

Release of information (ROI): A document that allows a participant to verbally or physically (via signature) authorize the sharing of his/her/their personal information to designated partners.

Resource and Service Navigator: A staff member employed by Idaho Department of Health and Welfare that identifies and develops resources and services that help individuals and families meet their basic needs through developing viable customized service plans focused on family strengths and community supports so they may achieve stability.

Runaway and Homeless Youth (RHY) Program: A Family and Youth Services Bureau funded grant program that provides street outreach, emergency shelter, and long-term transitional living and maternity group home programs to serve and protect young people.

Sage: An online repository that allows greater flexibility to recipients, CoCs, and HUD to report and search CoC program Annual Performance Report (APR) data. All CoC grant recipients are required to submit their APRs using Sage.

Service Provider: Any agency providing homelessness services within the HIC.

Service Provider Contract: A contract entered into by agencies (Service Providers) and IHFA concerning the rights and responsibilities of both parties related to the administration and use of the HMIS.

Sheltered Survey: A count of the total number of persons in housing projects on the night the Point In Time Count. The survey also reports on subpopulations, including Chronically Homeless, and adults with specific disabilities (Serious Mental Illness, Substance Abuse Disorder, and HIV). Historically, the HIC has also included the optional count of adults fleeing domestic violence.

Street Outreach: *The act of reaching out to unsheltered homeless people; connecting them with emergency shelter, housing or critical services, and providing urgent, non facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility.*

Subrecipient: A private nonprofit organization, State, local government, or instrumentality of State or local government that receives a sub-grant from the Recipient to carry out a project.

System Performance Measures (SPM): A HUD-required report which includes seven (7) measures on performance. The HIC only qualifies to report on six (6) of the measures, which are designed to help communities gauge their progress in preventing and ending homelessness and provide a more complete picture of how well a community is achieving these goals.

Transitional housing (TH): *A project that has as its purpose facilitating the movement of homeless individuals and families to permanent housing within a reasonable amount of time (usually 24 months). Includes housing primarily designed to serve deinstitutionalized homeless individuals and other homeless individuals with mental or physical disabilities and homeless families with children.*

Unaffiliated Third Party: Any entity or individual, other than the Service Provider, entering into a contract with the HMIS Lead agency, or the Collaborative Applicant.

Unified Funding Agency (UFA): *A Collaborative Applicant selected by the CoC (and approved by HUD) to apply for, receive, and distribute funding for all projects in a CoC.*

Universal Data Elements (UDE): Data elements required to be entered into the HMIS by all participating agencies regardless of funding source, as identified in the HMIS Data Standards Manual.

Unsheltered Homeless: Individuals and families who qualify as homeless under Category 1(i) of HUD's "homeless" definition.

U.S. Department of Housing and Urban Development (HUD): The federal agency responsible for administering housing and homelessness programs, including the CoC and ESG programs.

U.S. Department of Veterans Affairs (VA): The federal agency responsible for providing health care and other services, including assistance to end homelessness, to veterans and their families.

Youth: A person under the age of 25.

- **Accompanied Minor:** A person under the age of 18 that presents for services accompanied by an older adult or guardian.
- **Homeless Youth:** *Includes all homeless persons aged 24 or younger and without a head of household older than 24. This group does not include youth living with family members*

older than 24. This population includes youth in foster care, juvenile justice, and health care systems.

- **Minor Youth:** A person under the age of 18.
- **Parenting Youth:** Individual heads of households who are age 24 or younger who are pregnant or who are the parents or legal guardians of one or more children who are present with or sleeping in the same place as the Youth parent.
- **Transition Aged Youth:** Persons between age 18 and 24 who are in the process of transitioning from childhood to adulthood.
- **Unaccompanied Minor:** A person younger than 18 who presents for services without a parent, legal guardian, or caretaker.
- **Unaccompanied Youth Household:** Persons younger than 25 who present for services without a parent, legal guardian, or caretaker.

Youth Action Board (YAB): A collective of individuals aged 18-24 with lived experience of homelessness who provide invaluable insights and guidance to ensure that HIC strategies are youth-centered and effective.

Youth Aging Out of Foster Care: A young person in the foster care system who reaches the legal age limit set by their state, usually 18, and must leave the system without achieving permanency such as reunification with a parent or adoption, meaning they transition to independent living, usually without a stable home or support network.

Youth Involved in Child Welfare System: Children and adolescents who are in the care of the child welfare agency due to abuse, neglect, or similar reasons.

Youth Involved in the Juvenile Justice System: Persons under the age of 18 who are accused of committing a criminal or delinquent act, or who are involved in status offense charge

7.2: ACRONYM LIST

ADA	Americans with Disabilities Act
AFHMP	Affirmative Fair Housing Market Plan
AHAR	Annual Homeless Assessment Report
AMI	Area Median Income
AP	Access Point
APR	Annual Performance Report
ARD	Annual Renewal Demand
BABA	Build America, Buy America
BoS	Balance of State
CA	Collaborative Applicant
CAPER	Consolidated Annual Performance and Evaluation Report
CDBG	Community Development Block Grant
CDC	Centers for Disease Control
CE	Coordinated Entry
CES	Coordinated Entry System
CFR	Code of Federal Regulations
CHDO	Community Housing Development Organization
CHO	Covered Homeless Organization
CMIS	Community Management Information System
CoC	Continuum of Care
CSV	Comma-Separated Values
DOB	Duplication of Benefits
DOL	Department of Labor
DV	Domestic Violence
eSNAPS	Electronic Special Needs Assistance Programs
ER	Environmental Review
ES	Emergency Shelter
ESG	Emergency Solutions Grant
ETP	Emergency Transfer Plan

Written Standards

FHA	Fair Housing Act
FMR	Fair Market Rent
FOIA	Freedom of Information Act
FQHC	Federally Qualified Health Centers
FYI	Foster Youth to Independence
FYSB	Family and Youth Services Bureau
GED	General Education Development
GIW	Grant Inventory Worksheet
GPD	Grant and Per Diem Program
HCHV	Health Care for Homeless Veterans
HCN	Homeless Coalition Network
HCV	Housing Choice Voucher
HDX 2.0	Homeless Data Exchange 2.0
HEARTH	Homeless Emergency and Rapid Transition to Housing
HHS	Health and Human Services
HIC	House Idaho Collaborative
HIC	Housing Inventory Count
HIPAA	Health Insurance Portability and Accountability Act
HIRC	Housing and Information Resource Center
HMIS	Homeless Management Information System
HoH	Head of Household
HOME	Home Investment Partnerships Program
HP	Homelessness Prevention
HPF	Home Partnership Foundation
HQS	Housing Quality Standards
HUD	US Department of Housing and Urban Development
HVRP	Homeless Veterans Reintegration Program
IDHW	Idaho Department of Health and Welfare
IDIS	Integrated Disbursement and Information System
IDOC	Idaho Department of Commerce

Written Standards

IDOC	Idaho Department of Corrections
IFHC	Intermountain Fair Housing Council
IHFA	Idaho Housing and Finance Association
IRP	Independent Review Panel
LAP	Language Assistance Plan
LBP	Lead-Based Paint
LEP	Limited English Proficiency
LEP	Lived Experience Panel
LIHEAP	Low-Income Home Energy Assistance Program
LIHTC	Low-Income Housing Tax Credit
LoS	Length of Stay
LoT	Length of Time (homeless)
LSA	Longitudinal System Analysis
MOU	Memorandum of Understanding
NAEH	National Alliance to End Homelessness
NCHE	National Center for Homeless Education
NHSDC	National Human Services Data Consortium
NOFA	Notice of Funding Availability (local competition)
NOFO	Notice of Funding Opportunity (HUD)
NSP	Neighborhood Stabilization Program
NSPIRE	National Standards for the Physical Inspection of Real Estate
OPH	Other Permanent Housing
OPH	Our Path Home
PATH	Project for Assistance in Transition from Homelessness
PBRA	Project Based Rental Assistance
PDDE	Project Descriptor Data Elements
PH	Permanent Housing
PHA	Public Housing Agency
PIH	Public and Indian Housing Department of HUD
PII	Personally Identifiable Information

Written Standards

PIT	Point in Time
PSDE	Program Specific Data Element
PSH	Permanent Supportive Housing
RA	Rental Assistance
RC	Regional Coalition
RFI	Request for Information
RFP	Request for Proposal
RHY	Runaway and Homeless Youth Program
ROI	Release of Information
RR	Rent Reasonableness
RRH	Rapid Rehousing
SAMHSA	Substance Abuse and Mental Health Services Administration
SBRA	Sponsor Based Rental Assistance
SNAP	Special Needs Assistance Programs
SNAP	Supplemental Nutrition Assistance Program
SPM	System Performance Measures
SRO	Single Room Occupancy
SS	Supportive Services
SSO	Supportive Services Only
SSVF	Supportive Services for Veteran Families
STRMU	Short term rent, mortgage or utility assistance
TANF	Temporary Assistance for Needy Families
TAY	Transition Age Youth
TBRA	Tenant Based Rental Assistance
TH	Transitional Housing
TH-RRH	Transitional Housing- Rapid Rehousing Joint Component
TLP	Transitional Living Program
UDE	Universal Data Elements
UFA	United Funding Agency
USICH	US Interagency Council on Homelessness

Written Standards

VA	US Department of Veterans Affairs
VASH	Veterans Affairs Supportive Housing
VAWA	Violence Against Women Act
VHA	Veterans Health Administration
VOYC	Voice of Youth Count
VSP	Victim Service Provider
WIC	Women, Infants, and Children
YAB	Youth Action Board
YARH	Youth at Risk of Homelessness
YHDP	Youth Homelessness Demonstration Program
YHSI	Youth Homelessness System Improvement
YYA	Youth and Young Adults

7.3: ESG LINE ITEM DETAIL

ESG Program Description of Eligible Costs 24 CFR 576	
Eligible Costs:	
Emergency Shelter	
Services	ESG funds may be used to provide essential services to individuals and families and individuals, and operating emergency shelters.
Case Management	The cost of assessing, arranging, coordinating and monitoring the delivery of individualized services to meet the needs of the program participant is eligible
	Using the centralized or coordinated assessment system as required under §576.400d
	Conducting the initial evaluation required under §576.401(a), including verifying and documenting eligibility
	Developing, securing, and coordinating services and obtaining Federal, State, and local benefits
	Monitoring and evaluating program participant progress
	Providing information and referrals to other providers
	Providing ongoing risk assessment and safety planning with survivors of domestic violence, dating violence, sexual assault, and stalking
	Developing an individualized housing and service plan, including planning a path to permanent housing stability.
Child Care	The costs of child care for program participants, including providing meals and snacks, and comprehensive and coordinated sets of appropriate developmental activities, are eligible. The children must be under the age of 13, unless they are disabled. Disabled children must be under the age of 18. The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.
Education Services	When necessary for the program participant to obtain and maintain housing, the costs of improving knowledge and basic educational skills are eligible. Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED). Component services or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies and instructional material; counseling; and referral to community resources.

Employment Assistance and Job Training	The costs of employment assistance and job training programs are eligible, including classroom, online, and/or computer instruction; on-the-job instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential.
	Cost of providing reasonable stipends to program participants in employment assistance and job training programs.
	Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.
	Services that assist individuals in securing employment are: employment screening, assessment, or testing; structured job skills and job-seeking skills; special training and tutoring, including literacy training and prevocational training; books and instructional material; counseling or job coaching; and referral to community resources.
Outpatient Health Services	Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals.
	Funds may be used only for these services to the extent that other appropriate health services are unavailable within the community.
	Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate medical treatment, preventative medical care, and health maintenance services, including emergency medical services; providing medication and follow-up services, including emergency medical services; providing medication and follow-up services; and providing preventative and non-cosmetic dental care.
Life Skills	The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance use, and homelessness are eligible costs. These services must be necessary to assist the program participant function independently in the community. Component life skills training are budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public transportation, and parenting.
Mental Health Services	Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions.

Written Standards

	ESG funds may only be used for these services to the extent that other appropriate mental health services are unavailable or inaccessible in the community.
	Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning circumstances. Problem areas may include family and marital relationships, parent-child problems, or symptom management.
	Eligible treatment consists of crisis interventions; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.
Substance Abuse Treatment Services	Eligible substance abuse treatment services are designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors and are provided by licensed or certified professionals.
	ESG funds may only be used for these services to the extent that other appropriate substance abuse services are unavailable or inaccessible in the community.
	Eligible treatment consists of client intake and assessment, and outpatient treatment for up to 30 days. Group and individual counseling and drug testing are eligible costs. Inpatient detoxification and other inpatient drug or alcohol treatment are not eligible costs.
Transportation	Eligible costs consist of transportation costs of a program participant's travel to and from medical care, employment, child care, or other eligible essential services facilities.
	The cost of a program participant's travel on public transportation.
	If services workers use their own vehicles, mileage allowance for service workers to visit program participants.
	The cost of purchasing or leasing a vehicle for the recipient or subrecipient in which staff transports program participants and/or staff serving program participants, and the cost of gas, insurance, taxes, and maintenance for the vehicle.
	Gas vouchers are no longer eligible to be reimbursed; i.e.: this includes gas cards, filling up gas tanks, etc.

	The travel costs of recipient or subrecipient staff to accompany or assist program participants to use public transportation.
Services for Special Populations	ESG funds may be used to provide services for homeless youth, domestic violence services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under paragraphs (a)(1)(i) through (a)(1)(x) of this section.
Operations 24 CFR 576.102 (3)	Eligible costs are the costs of maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter. See additional information at the bottom section for furniture and equipment inventory requirements.
Homeless Prevention and Rapid Rehousing	
Homeless Prevention	ESG funds may be used to provide housing relocation and stabilization services and short-and/or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the "homeless" definition in 576.2.
Housing Relocation and Stabilization Financial	Financial Assistance costs -ESG funds may be used to pay housing owners, utility companies, and other third parties. Costs: rental application fees, security deposits(no more than 2 mo. rent), last month's rent(cannot exceed one month's rent and included in total rental assistance not to exceed 24 months in a 3-year period), utility deposits, utility payments(For up to 24 months per participant, per service, including 6 months of arrears per service. Eligible utilities include gas, electric, water and sewage.), moving costs (temporary storage fees up to 3 months, temporary storage fees in arrears is not eligible).
Housing Relocation and Stabilization Services	Housing Search and Placement -Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing. This includes: assessment of housing barriers, needs, and preferences, development of an action plan for locating housing, housing search, outreach to and negotiation with owners, assistance with submitting rental applications and understanding leases and assessment of housing for compliance with ESG requirements for habitability, lead-based paint, and rent reasonableness.

	Housing Stability Case Management- ESG funds may be used to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing. Using the centralized or coordinated assessment system, conducting the initial evaluation required, counseling, developing, securing, and coordinating services and obtaining Federal, State, and local benefits, monitoring and evaluating program participant progress, providing information and referrals to other providers, developing an individualized housing and service plan, including planning a path to permanent housing stability, and conducting re-evaluations. Cannot exceed 30 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing.
Short Term and Medium Term Tenant-Based Rental Assistance(Rent)	Subject to general conditions under § 576.103 and §576.104, the recipient or subrecipient may provide a program participant with up to 24 months of rental assistance during any 3-year period. This assistance may be short-term rental assistance up to 3 months, medium-term rental assistance 3-24 months and payment of rental arrears consists of a one-time payment for up to 6 months' rent including any late fees.
Rapid Rehousing	ESG funds may be used to provide housing relocation and stabilization services and short-and/or medium-term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing.
Housing Relocation and Stabilization Financial	Financial Assistance costs-ESG funds may be used to pay housing owners, utility companies, and other third parties. Costs: rental application fees, security deposits(no more than 2 mo. rent), last month's rent(cannot exceed one month's rent and included in total rental assistance not to exceed 24 months in a 3-year period), utility deposits, utility payments(For up to 24 months per participant, per service, including 6 months of arrears per service. Eligible utilities include gas, electric, water and sewage.), moving costs (temporary storage fees up to 3 months, temporary storage fees in arrears is not eligible).
Housing Relocation and Stabilization Services	Housing Search and Placement-Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing. This includes: assessment of housing barriers, needs, and preferences, development of an action plan for locating housing, housing search, outreach to and negotiation with owners, assistance with submitting rental applications and understanding leases and assessment of housing for compliance with ESG requirements for habitability, lead-based paint, and rent reasonableness.

	Housing Stability Case Management- ESG funds may be used to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing. Using the centralized or coordinated assessment system, conducting the initial evaluation required, counseling, developing, securing, and coordinating services and obtaining Federal, State, and local benefits, monitoring and evaluating program participant progress, providing information and referrals to other providers, developing an individualized housing and service plan, including planning a path to permanent housing stability, and conducting re-evaluations. Cannot exceed 30 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing.
Short Term and Medium Term Tenant-Based Rental Assistance(Rent)	Subject to general conditions under § 576.103 and §576.104, the recipient or subrecipient may provide a program participant with up to 24 months of rental assistance during any 3-year period. This assistance may be short-term rental assistance up to 3 months, medium-term rental assistance 3-24 months and payment of rental arrears consists of a one-time payment for up to 6 months' rent including any late fees.
HMIS	Purchasing or leasing computer hardware, software and/or software licenses
	Leasing office space, equipment, furniture, and utilities for HMIS activities
	Salaries, operating costs, and duties as required to operate an HMIS
	Trainings related to the use of HMIS
	Reporting to COC on HMIS
Admin.	General management, oversight, coordination, monitoring and evaluation
	Salaries, wages and related costs
	Reports for sub-recipient to HUD
	Evaluate program results
	Resolution of audit or monitoring findings
	Managing or supervising staff completing any of the above mentioned items.
	Training on ESG requirements

Written Standards

	Administrative services for administration of the program
	Items such as labels, paper, postage, stamps, etc.
Additional information	
1- HUD requires collaboration with mainstream resources. If services are being provided in your local area, then ESG funds should not be used to provide that service.	
2- Inventory - please track items for equipment and furniture that have one useful year of life and are over \$5,000. Items purchased with HUD funds should be tracked on an inventory sheet so they can be reviewed at monitoring. Your Fiscal Officer should be maintaining a depreciation schedule so that items can be removed from inventory at the point of depreciation to zero.	

7.4: CoC LINE ITEM DETAIL

COC Program Description of Eligible Costs 24 CFR 578	
Eligible Costs From the HEARTH regulations:	
Leasing	refer to Leasing & RA tab
Rental Assistance	refer to Leasing & RA tab
Supportive Services	Grant may fund eligible costs of services that address the special needs of program participants. Services provided must assist program participants obtain and maintain housing.
Annual Assessment of Service Needs	The costs of conducting an annual assessment of the service needs of the program participants and making adjustments as required by §578.53(a)(2).
Assistance with Moving Costs	Reasonable one-time moving costs, including truck rental and hiring a moving company.
Case Management	The cost of assessing, arranging, coordinating and monitoring the delivery of individualized services to meet the needs of the program participant(s). Component services and costs include:
	- Counseling.
	- Developing, securing and coordinating services.
	- Using the centralized or coordinated assessment system as required under 24 CFR part 578.23(c)(9).
	- Obtaining federal, state and local benefits.
	- Monitoring and evaluating program participant progress.
	- Providing ongoing risk assessment and safety planning for survivors of domestic violence, sexual assault, and stalking.
	- Developing an individualized housing and service plan, including a path to permanent housing stability.
	- Conducting the required annual assessment of program participants' service needs (24 CFR part 578.53(a)(2)).
	- Initial drug testing (this needs to apply to all participants and only at initial entry).

Written Standards

	- Phones for the Case Manager's use and the main office phone (pro-rated costs).
	- Child care for participants' children during case management.
Child Care	Costs of establishing and operating child care; providing child care vouchers and meals and snacks for children from families experiencing homelessness; and delivering comprehensive and coordinated developmental activities, provided that:
	- Children are under age 13, unless they have a disability.
	- The child care center is licensed by the jurisdiction in which it operates in order for its costs to be eligible.
Education Services	Costs of improving knowledge and basic educational skills, including:
	- Instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a second language, and General Educational Development (GED).
	- Component services, including screening, assessment, and testing; individual or group instruction; tutoring, provision of books, supplies, and instructional material; counseling; and referral to community resources.
Employment Assistance and Job Training	Costs of establishing and operating employment assistance and job training programs, including:
	- Classroom, online, and/or computer instruction.
	- On-the-job instruction.
	- Services that assist individuals in securing employment, including:
	-Employment screening, assessment, or testing.
	-Structured job skills and job-seeking skills.
	-Special training and tutoring, including literacy training and pre-vocational training.
	-Books and instructional material.
	-Counseling or job coaching.
	-Referral to community resources.
	- Services that assist individuals in acquiring learning skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.
	- Services that assist individuals in increasing their earning potential.

Written Standards

	- The cost of providing reasonable stipends to program participants in employment assistance and job training programs.
Food	Cost of providing meals or groceries to program participants. Pursuant to the provisions of 24 CFR part 578.75(e), recipients and subrecipients who use COC program funds to provide supportive housing for homeless persons with disabilities must provide residents with meals or meal preparation facilities.
	- Groceries could be construed as both food and basic, essential household supplies (toilet paper and hygiene supplies can be included).
Housing Search and Counseling Services	Costs of helping eligible program participants locate, obtain, and retain suitable housing. Component services or costs include:
	- Tenant counseling; helping individuals and families understand leases; securing utilities; and making moving arrangements.
	- Mediation with property owners and landlords on behalf of eligible program participants.
	- Credit counseling, accessing a free personal credit report, and resolving personal credit issues.
	- Payment of rental application fees (background check on program participant is only eligible when included in the landlord's application fee).
Life Skills Training	Costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance abuse, and homelessness but that are necessary to assist the program participant in functioning independently in the community. Such life management skills include the budgeting of resources and money management; household management; conflict management; shopping for food and needed items; nutrition; the use of public transportation; and parent training.
	- Child care for participants' children during life skills training.
	- Hygiene kits as part of life skills training only.
Mental Health Services	Costs of direct outpatient treatment of mental health conditions provided by licensed professionals. Eligible services may include crisis intervention; counseling; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.
Outpatient Health Services	Costs of direct outpatient treatment of medical conditions when provided by licensed medical professionals, such as:
	- Providing an analysis or assessment of an individual's health problems and development of a treatment plan.
	- Helping individuals understand their health needs.

Written Standards

	- Providing medical treatment or helping individuals obtain and comply with appropriate medical treatment.
	- Providing preventive medical care and health maintenance services, including in-home health services and emergency medical services.
	- Providing appropriate medication.
	- Providing follow-up services.
	- Providing preventive and non-cosmetic dental care.
Substance Abuse Treatment Services	Costs of program participant intake and assessment, outpatient treatment, group and individual counseling, and drug testing. The costs of inpatient detoxification and other inpatient drug or alcohol treatment are ineligible under CoC program supportive services.
Transportation	Costs include the following:
	- Program participants' travel on public transportation or in vehicles provided by the recipient or subrecipient to/from medical care, employment, child care, or other eligible services.
	- Mileage allowance for service workers to visit program participants and carry out housing quality inspections.
	- The costs associated with the purchase or lease of a vehicle (gas, insurance, taxes, maintenance) in which staff transports program participants and/or staff serving program participants.
	If public transportation options are not sufficient within the area, the recipient may make a one-time payment on behalf of a program participant needing car repairs or maintenance required to operate a personal vehicle, subject to the following:
	- The cost of a recipient's or subrecipient's staff assigned to accompany or assist program participants in using public transportation. If public transportation options are not sufficient within the area, the recipient may make a one-time payment on behalf of a program participant needing car repairs or maintenance required to operate a personal vehicle, subject to the following:
	- Payments for car repairs or maintenance on behalf of the program participant may not exceed 10 percent of the Blue Book value of the vehicle (Blue Book refers to the guidebook that compiles and quotes prices for new and used automobiles and other vehicles of all makes, models, and types).
	- Payments for car repairs or maintenance must be made by the recipient or subrecipient directly to the third party that repairs or maintains the car.
	- Recipients or subrecipients may require program participants to share in the cost of car repairs or maintenance as a condition of receiving assistance with car repairs or maintenance.

	-Gas vouchers are no longer eligible to be reimbursed; i.e.: this includes gas cards, filling up gas tanks, etc.
Utility Deposits	Costs associated with utility deposits, which must be a one-time fee, paid to utility companies. (Certain other move-in costs, including security deposits and first and last months' rent, are eligible costs under leasing and rental assistance.)
Operations Costs associated with day-to-day physical operation of housing in which homeless persons are housed	Maintenance and repair of housing.
	Property taxes and insurance.
	Scheduled payments to a reserve for replacement of major systems of the housing (provided that the payments must be based on the useful life of the system and expected replacement cost).
	Building security (staff).
	Electricity, gas, water, sewer and garbage (participants' phone and internet is not included).
	Furniture - these are the items that were requested in the application (stays with project, does not go with participant; i.e.: mattresses, bed frames, loveseats, etc.); these need to be inventoried, see additional information below.
	Equipment - these are the items that were requested in the application (stays with project, does not go with participant; i.e.: refrigerator, printer, furnace, security camera, etc.); these need to be inventoried, see additional information below.
HMIS or Comparable Database	Purchasing or leasing computer hardware, software and/or software licenses.
	Leasing office space, equipment, furniture, and utilities for HMIS activities.
	Salaries, operating costs, and duties as required to operate an HMIS.
	Trainings related to the use of HMIS.
	Reporting to CoC on HMIS.
Admin.	General management, oversight, coordination, monitoring and evaluation.
	Salaries, wages and related costs of the recipient's staff, the staff of subrecipients, or other staff engaged in program administration.

	Reports for subrecipient to send to recipient so they can submit to HUD.
	Evaluate program results.
	Resolution of audit or monitoring findings (a prorated portion can be submitted).
	Managing or supervising other eligible Administration activities.
	Training on CoC requirements.
	Administrative services for administration of the program.
Ineligible Items	
1-Program fees are not allowed to be charged in CoC program.	
2-Program income cannot be used as match and cannot cover costs that are ineligible CoC expenses.	
3-Match cannot cover costs that are ineligible CoC expenses.	
4-HUD has determined house phones to be an ineligible cost and ineligible match item. Replacement resources for house phones include: Syringa Wireless has low-income plans. Some places, like shelters and H&W receive donated phones. There is a phone systems called Assurance Wireless that is free. The participant can provide documentation of Food Stamps or SSD or SSI or Medicaid.	
Additional information	
1-HUD requires collaboration with mainstream resources. If services are being provided in your local area, then COC funds should not be used to provide that service.	
2-Inventory - please track items that have one useful year of life, are over \$5000 and are purchased with HUD funds on an inventory sheet so they can be reviewed at monitoring. Your Fiscal Officer should be maintaining a depreciation schedule so that items can be removed from inventory at the point of depreciation to zero (please see Section 20 of your Grant Agreement).	
3-Non-consumable personal items such as sheets, towels, etc. cannot be purchased with CoC funds. Some stores will donate them.	

7.5: RENT REASONABLENESS FORMS

Rent Reasonableness Certification Form

Special Needs Assistance Programs (COC, ESG)

Idaho Housing and Finance Association

Landlord Information	Proposed Unit Overview
Owner/Manager: _____	Participant Name or Identifier: _____
Full Address: _____	Full Unit Address: _____
Phone: _____	Type of Unit: _____
E-mail (optional): _____	Square Footage: _____
Website (optional): _____	Number of Bedrooms: _____
	Year Built: _____

Proposed Unit Details	
Amenities	Management & Maintenance
No. of baths: _____	On-Site Manager (Y/N): _____
Dishwasher: _____	Owner-Supplied Utilities: _____
W/D Hookup: _____	Tenant-Supplied Utilities: _____
Refrigerator: _____	_____
Range/Oven: _____	_____
A/C: _____	_____
Heat: _____	_____

Rent Reasonableness Comparison					
	Proposed Unit	Comparable #1	Comparable #2	Comparable #3	Average of Comparables
Reference #	N/A				

Written Standards

Contract Rent	\$	\$	\$	\$	\$
Special Details: _____					

	I understand, by submitting this form, that reimbursement for rent for the proposed unit is not guaranteed. If the comparable units submitted are too dissimilar to the proposed unit, the rent will not be considered reasonable and will not be reimbursed.
--	---

Completed By (Type Name)	Date

Agency

Comparable Unit Details Form

Special Needs Assistance Programs (COC, ESG)

Idaho Housing and Finance Association

Landlord Information	Unit Overview
Owner/Manager: _____	Full Address: _____
Full Address: _____	_____
_____	Number of Bedrooms: _____
Phone: _____	Square Footage: _____
E-mail (optional): _____	Type of Unit: _____
Website (optional): _____	Year Built: _____
_____	Contract Rent: _____

Unit Details	
Amenities No. of baths: _____ Dishwasher: _____ W/D Hookup: _____ Refrigerator: _____ Range/Oven: _____ A/C: _____ Heat: _____	Management & Maintenance On-Site Manager (Y/N): _____ Owner-Supplied Utilities: _____ _____ Tenant-Supplied Utilities: _____ _____

Rent Change Information		
Rent Amount: _____	Date: _____	Initials: _____

Written Standards

Rent Amount:	_____	Date:	_____	Initials:	_____
Rent Amount:	_____	Date:	_____	Initials:	_____
Rent Amount:	_____	Date:	_____	Initials:	_____
Rent Amount:	_____	Date:	_____	Initials:	_____

Completed By (Type
Name)

Date

Rent Reasonableness Certification Form

Special Needs Assistance Programs

Idaho Housing and Finance Association

Required Fields**Address****Number of Bedrooms****Square Footage****Type of Unit****Utilities included in rent**

Proposed Unit	Comp #1	Comp #2	Comp #3

*Optional Fields**(at least 2 fields must be completed for all units)**Number of Bathrooms**Year Built**Handicap Accessible?**Other Amenities*

Required Fields**Base Unit Rent (on lease)****Utility Allowance****Gross Rent**

Source:

--	--	--

Average Comp Gross Rent:

Proposed Unit Rent Must Not Exceed \$50 over the Average Comp Gross Rent

☐

I understand, by submitting this form, that reimbursement for rent for the proposed unit is not guaranteed. If the comparable units submitted are too dissimilar to the proposed unit, the rent will not be considered reasonable and will not be reimbursed.

Completed By (Type Name)_____
Date_____
Agency

7.6 EMERGENCY TRANSFER PLAN

Housing Idaho Collaborative (HIC)

Emergency Transfer Plan:

Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

Emergency Transfers

The HIC is concerned about the safety of the participants of the programs funded by Continuum of Care (CoC), Emergency Solutions Grant (ESG), and Coordinated Entry (CE) program grant funds, and such concern extends to participants who have experienced or are experiencing domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA) CoC, ESG, and CE program-funded projects providing permanent housing (Rapid Rehousing (RRH), Permanent Supportive Housing (PSH), or Transitional Housing (TH) must allow participants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the participant's current unit to another unit. For purposes of this policy, an internal emergency transfer refers to an emergency relocation of a tenant to another unit where the tenant would not be categorized as a new applicant; that is, the tenant may reside in the new unit without having to undergo an application process. An external emergency transfer refers to an emergency relocation of a tenant to another unit where the tenant would be categorized as a new applicant; that is, the tenant must undergo an application process in order to reside in the new unit. Safe unit refers to a unit that the victim of domestic violence believes is safe. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation. The ability of a housing project to honor such a request for participants currently receiving assistance, however, may depend upon a preliminary determination that the participant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether the housing project is able to locate another dwelling unit that is available and is safe to offer the participant for temporary or more permanent occupancy.

This plan identifies participants who are eligible for an emergency transfer; the documentation needed to request an emergency transfer; confidentiality protections; how an emergency transfer may occur; and guidance to participants on safety and security. This plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the Federal agency with oversight of HIC and CoC program-funded projects are in compliance with VAWA.

Eligibility for Emergency Transfers

A project participant who has experienced domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR Part 5, Subpart L, is eligible for an emergency transfer, if:

- The project participant expressly requests the transfer; and
- The project participant reasonably believes that there is a threat of imminent harm from further violence if the project participant remains within the same unit; or
- The project participant has experienced sexual assault, then the project participant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.

A project participant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan. Project participants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

Emergency Transfer Request Documentation

To request an emergency transfer, a project participant, or someone acting on behalf of the project participant who is requesting the transfer, must submit a written request for an Emergency Transfer. Written requests for an Emergency Transfer should be submitted to the CoC program funded housing project, not to the housing owner or landlord, and the project staff will work with the owner or landlord to facilitate the transfer on the participant's behalf. The participant may, but is not required, to use the Emergency Transfer Request form provided in the attached Appendix A. The housing project will offer reasonable accommodations to this policy for individuals with disabilities. The project participant's written request for an emergency transfer should include either:

- A statement expressing that the project participant reasonably believes that there is a threat of imminent harm from further violence if the project participant were to remain in the same dwelling unit assisted under the housing project; or
- A statement that the participant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the participant's request for an emergency transfer.

The housing project may request additional documentation from a participant, in accordance with the documentation policies of HUD's regulations at 24 CFR Part 5, Subpart L. The housing project may use the HUD forms 5382 and 5383 (attached) to document requests for an emergency transfer and to document incidents of domestic violence. **The participant may choose what documentation to provide from the list established by HUD, and the housing project must accept the participant's choice of documentation.**

Confidentiality

All information provided regarding domestic violence, dating violence, sexual assault or stalking, including the fact that an individual is or has experienced such violence or stalking, or that they are exercising their rights under VAWA, must be kept confidential. This includes keeping confidential the new location of the dwelling unit of the project participant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the project participant. Confidentiality also means that providers and/or property owner or manager may not:

- Enter the information into any shared database except the authorized DV comparable database; or
- Allow any individual administering assistance or other services on behalf of the providers and/or property owner or manager (for example, employees and contractors) to have access to confidential information unless for reasons that specifically call for these individuals to have access to this information under applicable Federal, State, or local law.; or
- Provide the information to any other entity or individual, except to the extent that the disclosure is:

Written Standards

- o Requested or consented to by the individual, in writing, stating permission to release the information on a time-limited basis; or
- o Needed by the housing provider to use in an eviction or termination proceeding, such as to evict your abuser or perpetrator or terminate your abuser or perpetrator from assistance under this program.; or
- o Otherwise required by applicable law.

If project disclosure is required for use in an eviction proceeding or is otherwise required by applicable law, the project will inform the victim before disclosure occurs so that safety risks can be identified and addressed. See the [Notice of Occupancy Rights under the Violence Against Women Act](#) for more information about housing provider's responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

Emergency Transfer Timing and Availability

The housing project provider cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. However, the housing project provider will act as quickly as possible to move a project participant experiencing domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. Nothing may preclude a participant from seeking an internal emergency transfer and an external emergency transfer concurrently if a safe unit is not immediately available.

If the housing project is unable to locate safe and available units for which a participant who needs an emergency transfer is eligible, the project will assist the participant in identifying other housing providers who may have safe and available units to which the participant could move. At the participant's request, the project will also assist participants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking. If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit.

If the housing project is unable to locate a safe and available unit for which a participant who needs an emergency transfer is eligible, the housing project will assist the tenant in identifying other housing providers who may have safe and available units to which the tenant could move.

If a unit is available, the participant must agree to abide by the terms and conditions that govern occupancy in the unit to which the participant is being transferred. The project may be unable to transfer a project participant to a particular unit if the project participant has not or cannot establish eligibility for that unit.

For households living in assisted units who qualify for an emergency transfer, but a safe unit is not immediately available for an internal emergency transfer, the individual or family shall have priority over all other applicants for rental assistance, transitional housing, rapid rehousing, and permanent supportive housing projects funded under this part, provided that:

- The individual or family meets all eligibility criteria required by Federal law or regulation or HUD NOFA/NOFO; and
- The individual or family meets any additional criteria or preferences established in accordance with 24 CFR § 578.93(b)(1), (4), (6), or (7).

For the purposes of this plan, “immediately available” means a vacant unit, ready for move-in with a reasonable period of time.

The individual or family shall retain their original homeless status or status of chronically homeless for the purposes of the transfer. In cases where a household receiving participant-based rental assistance separates in order to initiate an emergency transfer, the housing project will work with the HIC to determine the appropriate actions with respect to the non-transferring family member(s). All confidentiality provisions apply for the victim in this situation.

Safety and Security of Participants

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the project participant is urged to take all reasonable precautions to be safe. For specific resources, participants are encouraged to contact:

Domestic Violence: National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Sexual Assault: Rape, Abuse & Incest National Network’s National Sexual Assault Hotline at 1-800-656-HOPE or the online hotline at <https://ohl.rainn.org/online/>.

Stalking: National Center for Victims of Crime’s Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

Tracking Requests and Outcomes

All covered housing providers must maintain records on emergency transfers requested under 24 CFR § 5.2005(e). Data must include the number of emergency transfers requested and the outcomes of each request. The data is required to be reported to HUD annually and providers must retain these records for a period of three years. Covered housing providers in the HIC will track the number of Emergency Transfers requested and their outcomes using the Emergency Transfer Requests and Outcomes Log (Appendix D.) For confidentiality, covered housing providers should record and keep only the information listed in the log. All confidentiality provisions apply.

Related Documents and Attachments

Attachment A: Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, HUD Form 5383

Attachment B: Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking and Alternate Documentation, HUD Form 5382

Attachment C: State organizations providing services to survivors of domestic violence, dating violence, sexual assault, or stalking

Note: Housing projects in the HIC that are required to use the Emergency Transfer Plan should make available to project participants a list of local organizations providing services to survivors of domestic violence, dating violence, sexual assault, or stalking

Attachment D: Emergency Transfer Requests and Outcomes Log

Written Standards

1. Despite the name of this law, VAWA protection is available to all victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.
2. For purposes of this plan, “CoC program-funded projects” include any permanent or transitional housing projects that are supported by CoC Program grant funds.
3. Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

Attachment A: HUD Form 5383

EMERGENCY TRANSFER

U.S. Department of Housing

OMB Approval No. 2577-0286

REQUEST FOR CERTAIN

and Urban Development

Exp. 06/30/2017

VICTIMS OF DOMESTIC

VIOLENCE, DATING VIOLENCE,

SEXUAL ASSAULT, OR STALKING

Purpose of Form: If you are a victim of domestic violence, dating violence, sexual assault, or stalking, and you are seeking an emergency transfer, you may use this form to request an emergency transfer and certify that you meet the requirements of eligibility for an emergency transfer under the Violence Against Women Act (VAWA).

Although the statutory name references women, VAWA rights and protections apply to all victims of domestic violence, dating violence, sexual assault or stalking. Using this form does not necessarily mean that you will receive an emergency transfer. See your housing provider's emergency transfer plan for more information about the availability of emergency transfers.

The requirements you must meet are:

- (1) You are a victim of domestic violence, dating violence, sexual assault, or stalking.** If your housing provider does not already have documentation that you are a victim of domestic violence, dating violence, sexual assault, or stalking, your housing provider may ask you for such documentation. In response, you may submit Form HUD-5382, or any one of the other types of documentation listed on that Form.
- (2) You expressly request the emergency transfer.** Submission of this form confirms that you have expressly requested a transfer. Your housing provider may choose to require that you submit this form, or may accept another written or oral request. Please see your housing provider's emergency transfer plan for more details.
- (3) You reasonably believe you are threatened with imminent harm from further violence if you remain in your current unit.** This means you have a reason to fear that if you do not receive a transfer you would suffer violence in the very near future.

OR

You are a victim of sexual assault and the assault occurred on the premises during the 90-calendar-day period before you request a transfer. If you are a victim of sexual assault, then in addition to qualifying for an emergency transfer because you reasonably believe you are threatened with imminent harm from further violence if you remain in your unit, you may qualify for an emergency transfer if the sexual assault occurred on the premises of the property from which

you are seeking your transfer, and that assault happened within the 90- calendar-day period before you submit this form or otherwise expressly request the transfer.

Submission of Documentation: If you have third-party documentation that demonstrates why you are eligible for an emergency transfer, you should submit that documentation to your housing provider if it is safe for you to do so. Examples of third party documentation include, but are not limited to: a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health care provider, or other professional from whom you have sought assistance; a current restraining order; a recent court order or other court records; a law enforcement report or records; communication records from the perpetrator of the violence or family members or friends of the perpetrator of the violence, including emails, voicemails, text messages, and social media posts.

Confidentiality: All information provided to your housing provider concerning the incident(s) of domestic violence, dating violence, sexual assault, or stalking, and concerning your request for an emergency transfer shall be kept confidential. Such details shall not be entered into any shared database. Employees of housing providers are not to have access to these details unless to grant or deny VAWA protections or an emergency transfer to you. Such employees may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

Emergency Transfer Request

TO BE COMPLETED BY OR ON BEHALF OF THE PERSON REQUESTING A TRANSFER

1. Name of victim requesting and emergency transfer: _____

2. Your name (if different from victim's): _____

3. Name(s) of other family member(s) listed on the lease: _____

4. Name(s) of other family member(s) who would transfer with the victim: _____

5. Address of location from which the victim seeks to transfer: _____

6. Address or phone number for contacting the victim: _____

7. Name of the accused perpetrator (if known and can be safely disclosed): _____

8. Relationship of the accused perpetrator to the victim: _____

9. Date(s), Time(s) and location(s) of incident(s): _____

10. Is the person requesting the transfer a victim of a sexual assault that occurred in the past 90 days on the premises of the property from which the victim is seeking a transfer? _____ (If yes, skip question 11. If no, fill out question 11).

11. Describe why the victim believes they are threatened with imminent harm from further violence if they remain in their current unit. _____

12. If voluntarily provided, list any third-party documentation you are providing along this notice: _____

This is to certify that the information provided on this form is true and correct to the best of my knowledge, and that the individual named above in Item 1 meets the requirement laid out on this form for an emergency transfer. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of admission, termination of assistance, or eviction.

Signature _____ Signed on (Date) _____

Attachment B: HUD Form 5382

CERTIFICATION OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING AND ALTERNATE DOCUMENTATION	U.S. Department of Housing and Urban Development	OMB Approval No. 2577-0286 Exp. 06/30/2017
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Purpose of Form: The Violence Against Women Act (“VAWA”) protects applicants, participants, and program participants in certain HUD programs from being evicted, denied housing assistance, or terminated from housing assistance based on acts of domestic violence, dating violence, sexual assault, or stalking against them. Despite the name of this law, VAWA protection is available to victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

Use of This Optional Form: If you are seeking VAWA protections from your housing provider, your housing provider may give you a written request that asks you to submit documentation about the incident or incidents of domestic violence, dating violence, sexual assault, or stalking.

In response to this request, you or someone on your behalf may complete this optional form and submit it to your housing provider, or you may submit one of the following types of third-party documentation:

(1) A document signed by you and an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional, or a mental health professional (collectively, “professional”) from whom you have sought assistance relating to domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse. The document must specify, under penalty of perjury, that the professional believes the incident or incidents of domestic violence, dating violence, sexual assault, or stalking occurred and meet the definition of “domestic violence,” “dating violence,” “sexual assault,” or “stalking” in HUD’s regulations at 24 CFR 5.2003.

(2) A record of a Federal, State, tribal, territorial or local law enforcement agency, court, or administrative agency; or

(3) At the discretion of the housing provider, a statement or other evidence provided by the applicant or participant.

Submission of Documentation: The time period to submit documentation is 14 business days from the date that you receive a written request from your housing provider asking that you provide documentation of the occurrence of domestic violence, dating violence, sexual assault, or stalking. Your housing provider may, but is not required to, extend the time period to submit the documentation, if you request an extension of the time period. If the requested information is not received within 14 business days of when you received the request for the documentation, or any extension of the date provided by your housing provider, your housing provider does not need to grant you any of the VAWA protections. Distribution or issuance of this form does not serve as a written request for certification.

Confidentiality: All information provided to your housing provider concerning the incident(s) of domestic violence, dating violence, sexual assault, or stalking shall be kept confidential and such details shall not be entered into any shared database. Employees of your housing provider are not to have access to these details unless to grant or deny VAWA protections to you, and such employees may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

Certification

TO BE COMPLETED BY OR ON BEHALF OF THE VICTIM OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING

1. Date the written request is received by victim: _____
2. Name of victim: _____
3. Your name (if different from victim's): _____
4. Name(s) of other family member(s) listed on the lease: _____

5. Residence of the victim: _____
6. Name of the accused perpetrator (if known and can be safely disclosed): _____
7. Relationship of the accused perpetrator to the victim: _____
8. Date(s) and time(s) of incident(s) (if known): _____
9. Location of incident(s): _____

In your own words, briefly describe the incident(s): _____ _____ _____ _____

This is to certify that the information provided on this form is true and correct to the best of my knowledge and recollection, and that the individual named above in Item 2 is or has been a victim of domestic violence, dating violence, sexual assault, or stalking. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of admission, termination of assistance, or eviction.

Signature _____ Signed on (Date) _____

Public Reporting Burden: The public reporting burden for this collection of information is estimated to average 1 hour per response. This includes the time for collecting, reviewing, and reporting the data. The information provided is to be used by the housing provider to request certification that the applicant or participant is a victim of domestic violence, dating violence, sexual assault, or stalking. The information is subject to the confidentiality requirements of VAWA. This agency may not collect this information, and you

Written Standards

are not required to complete this form, unless it displays a currently valid Office of Management and Budget control number.

Attachment C: Statewide Resources

Domestic Violence, Sexual Assault and Stalking Resources

Regions 1-7:

- National Domestic Violence Hotline – 1-800-799-7233 or 1-800-787-3224
- National Sexual Assault Hotline (RAINN) – www.rainn.org -1-800-656-4673
- National Center for Victims of Crime’s Stalking Resource Center - <https://www.victimsofcrime.org/our-programs/stalking-resource-center>
- Legal Aid of Idaho Domestic Violence Advice Line - 1-877-500-2980
- Idaho Domestic Violence Hotline - 1-800-669-3179
- Child Abuse Reporting - 1-855-552-KIDS (1-855-552-5437)

Region 1: Counties: Benewah, Bonner, Boundary, Kootenai, Shoshone

Safe Passage

- 24-hour Hotline: 208-664-9303

Shoshone County Women’s Resource Center

- Business Phone: 208-556-0500

Boundary County Crisis Center

- Business Phone: 208- 267-7334

Region 2: Counties: Clearwater, Idaho, Latah, Lewis, Nez Perce

Alternatives to Violence of the Palouse

- Business Phone: 509-332-4357
- 24-hour Hotline: 877-334-2887

YWCA Lewiston

- 24-hour Hotline: 208-746-9655

Solutions

- 208-777-7930
- 208-691-6812

Wilson Psychological Services

- 509-334-0782

Region 3: Counties: Adams, Boise, Canyon, Elmore, Gem, Owyhee, Payette, Valley, Washington

Hope’s Door (women & children)

- 24-hour Hotline: 208-459-6279

Rose Advocates

- Business phone: 208-642-1025
- 24-hour Hotline: 208-414-0740

Elmore County Domestic Violence Council

- Business phone: 208-590-0379
- 24-hour Hotline: 208-587-3300

Advocates Against Family Violence

Written Standards

- 24-hour Hotline: 208-459-4779

Nampa Family Justice Center

- Business phone: 208-475-5700
- 24-hour Hotline: 800-621-4673

Region 4: Counties: Blaine, Camas, Cassia, Gooding, Jerome, Lincoln, Minidoka, Twin Falls

Voices Against Violence

- 24-hour Hotline: 208-733-0100

The Advocates

- 24-hour Hotline: 208-788-4191

Region 5: Counties: Bingham, Power, Oneida, Bannock, Caribou, Bear Lake, Franklin

Family Services Alliance

- Business Phone: 208-232-0742
- 24-hour Hotline: 208-251-4357

Bingham County Crisis Center

- Business Phone: 208-785-1047
- 24-hour Hotline: 208-681-8712

Oneida Crisis Center

- Business Phone: 208-766-4412
- 24-hour Hotline: 208-766-3119

Women's Advocates

- 24-hour Crisis Phone: 208-251-HELP

Bright Tomorrows Child Advocacy Center

- 208-234-2646

Region 6: Counties: Bonneville, Butte, Clark, Custer, Fremont, Jefferson, Lemhi, Madison, Teton

The Mahoney House

- Business Phone: 208-756-3146
- 24-hour Hotline: 208-940-0600

Region 7: Ada County

Women's and Children's Alliance

- 24-Hour Domestic Abuse Hotline: 208-343-7025
- 24-Hour Sexual Assault Hotline: 208-345-7273 (RAPE)

Legal Resources

Regions 1-7:

- Idaho Legal Aid Services, Inc.: www.idaholegalaid.org - 208-746-7541
- National Center for Victims of Crime (NCVC): www.victimsofcrime.org
- Intermountain Fair Housing Council: contact@ifhcidaho.org - 208-383-0695
- Idaho Human Rights Commission: www.humanrights.idaho.gov - Phone 1-208-334-2873
- U.S. Attorney's Office: www.justice.gov/usao-id - Phone 208-334-9204
- Idaho Senior Legal Hotline: 1-866-345-0106

Written Standards

- Adult Protection Services: 1-800-877-3206
- Idaho Volunteer Lawyers: 800-221-3295
- Legal Aid of Idaho Domestic Violence Advice Line: 877-500-2980
- Attorney General of Idaho: 208-334-2400
- Crime Victim Compensation Program: 800-950-2110

Additional Region 2 Legal Aid:

YWCA Lewiston

- 24-hour Hotline: 208-746-9655

Latah County Court Assistance

- 208-882-8580

University of Idaho Legal Aid Clinic

- 208-885-6541

Nez Perce County Court Services

- 1113 F St Lewiston, ID - 208-799-3176

Nez Perce County Court Assistance Office

- 1230 Main Lewiston, ID 2nd Floor - 208-799-3191

NOTE: Covered housing providers must also give to victims of domestic violence, dating violence, sexual assault, or stalking a list of local organizations offering assistance.

Attachment D
HIC Emergency Transfer Requests and Outcomes Log

Organization: _____

Contact Person: _____

Email: _____ Phone Number: _____

For the time period: _____

#	Date Emergency Transfer was Requested	Outcome of Emergency Transfer (Granted/Denied)
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		

7.7: PARTICIPANT FILE STACKING ORDER

Housing Idaho Collaborative (HIC)

ESG - Shelter File stack order

Tab 1: Eligibility

- ☐ Intake Assessment/Application
- ☐ Homeless Status – with backup documentation
- ☐ Program Rules – Signed
- ☐ Grievance/Termination Rules – Signed
- ☐ HMIS/CMIS – Signed
- ☐ Any Release/Consent Forms – Signed

Tab 2: Services and Assistance

- ☐ Housing Planning
- ☐ Mainstream Resource Tracker
- ☐ Case Management Tracker
- ☐ Services Provided Tracker

Tab 3: Correspondence

- ☐ Participant Notices
- ☐ Any participant communication

Tab 4: Exit

- ☐ Any exit documentation
- ☐ Exit Survey
- ☐ Proof of Exit from HMIS/CMIS

ESG - HP and RRH File stack order

Tab 1: Eligibility

- ☐ Intake Assessment
- ☐ Application
- ☐ Homeless Status – **with backup documentation**
- ☐ Disability Status – **with backup documentation** (not required in every program)
- ☐ Program Rules – Signed
- ☐ Grievance/Termination Rules – **Signed**
- ☐ HMIS/CMIS – Signed
- ☐ Any Release/Consent Forms – **Signed**

Tab 2: Income and Assets

- ☐ Income Calculation Worksheet **at Intake** (Need to see how the income is calculated)
- ☐ Income verifications **at Intake**

Written Standards

- ☐ Asset Calculation Worksheet **at Intake** (Need to verify all assets, third party)
- ☐ Asset verifications **at Intake**

Tab 3: Lease and Recertification/Addendums

- ☐ Initial Lease
- ☐ Recertification/Addendums: (Newest to oldest)
- ☐ VAWA
- ☐ Utility Allowance
- ☐ Rent Reasonableness
- ☐ Income Limits (show source used)
- ☐ HQS inspections
- ☐ Lead-Based Paint disclosure

Tab 4: Services and Assistance

- ☐ Housing Planning
- ☐ Mainstream Resource Tracker
- ☐ Case Management Tracker (monthly)
- ☐ Services Provided Tracker/monthly reassessment of rental needs.

Tab 5: Correspondence

- ☐ Participant Notices
- ☐ Any participant communication

Tab 6: Exit

- ☐ Any exit documentation
- ☐ Exit Survey
- ☐ Proof of Exit from HMIS/CMIS

COC - PSH and RRH File stack order

- ☐ **Tab 1: Eligibility**
- ☐ Application
- ☐ Intake Assessment
- ☐ Homeless Status – with backup documentation
- ☐ Disability Status – with backup documentation (not required in every program)
- ☐ Program Rules – Signed
- ☐ Grievance/Termination Rules – **Signed**
- ☐ HMIS/CMIS – Signed
- ☐ Any Release/Consent Forms – **Signed**
- ☐ Any copies of driver license, ID card, social security card or Birth certificates (these documents are not required by IHFA, if it's in the file this is where it should be placed)

Tab 2: Income and Assets

- ☐ Income Calculation Worksheet **at Intake** (Need to see how the income is calculated)

Written Standards

- ☐ Income verifications **at Intake**
- ☐ Asset Calculation Worksheet **at Intake** (Need to verify all assets, third party)
- ☐ Asset verifications **at Intake**

Tab 3: Lease and Recertification/Addendums

- ☐ Initial Lease
- ☐ Recertification/Addendums: (Newest to oldest) (these should also contain any income and asset calculations and verifications at the time of recertification, each time a recertification is completed all the paperwork for that recertification stays together)
- ☐ VAWA
- ☐ Utility Allowance
- ☐ Rent Reasonableness
- ☐ Income Limits (Provide what agency uses for income limits)
- ☐ Initial inspections
- ☐ Any follow-up inspections (required to be completed yearly in some programs)
- ☐ Lead-Based Paint disclosure

Tab 4: Services and Assistance

- ☐ Housing Assessment/Barrier Assessment
- ☐ Housing Plan
- ☐ Mainstream Resource Tracker (being referred to services is a requirement, please track referral dates)
- ☐ Services Provided Tracker
- ☐ Case Management Tracker

Tab 5: Correspondence

- ☐ Participant Notices
- ☐ Any participant communication or recommendation letters

Tab 6: Exit

- ☐ Any exit documentation
- ☐ Exit Survey (this will satisfy the requirement of yearly assessment of services)
- ☐ Proof of Exit from HMIS/CMIS