

APPENDIX A: Glossary of Terms

At-risk of Homelessness – An individual or family who has income below 30% of area median family income for the area, as defined by HUD, and who does not have sufficient resources or support networks immediately available to prevent them from moving into an emergency shelter or other place described in the “homeless” definition and meets one of the following conditions:

- Has moved because of economic reasons two or more times during the prior 60 days;
- Is living in the home of another because of economic hardship;
- Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days;
- Lives in a hotel or motel (which is not paid for by charitable organizations or by government programs for low-income individuals);
- Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room;
- Is exiting a publicly funded institution or system of care; or
- Is a child or youth who does not qualify under this section but who qualifies as “homeless” under other federal regulations.

Chronically Homeless – A homeless individual with a disability who lives either in a place not meant for human habitation, a safe haven, or in an emergency shelter, or in an institutional care facility if the individual has been living in the facility for fewer than 90 days and had been living in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately before entering the institutional care facility. In order to meet the “chronically homeless” definition, the individual also must have been living as described above continuously for at least 12 months, or on at least four separate occasions in the last 3 years, where the combined occasions total a length of time of at least 12 months. Each period separating the occasions must include at least 7 nights of living in a situation other than a place not meant for human habitation, in an emergency shelter, or in a safe haven.

CoC/Continuum of Care – A group composed of representatives of relevant organizations, which generally includes nonprofit homeless providers; domestic violence service providers; faith-based organizations; governments; businesses; advocates; public housing agencies; school districts; social services providers; mental health agencies; hospitals; universities; affordable housing developers; law enforcement; organizations that serve homeless and formerly homeless veterans, and homeless or formerly homeless persons that are organized to plan for and provide a system of outreach, engagement, and assessment; emergency shelter; rapid rehousing; transitional housing; permanent housing; and prevention strategies to address the various needs of homeless persons and persons at risk of homelessness for a specific geographic area.

Community Management Information System (CMIS) – The Community Management Information System (CMIS) is a locally administered information system used to record and analyze client, service and housing data for individuals and families who are homeless or at risk of homelessness. It is used by Domestic Violence (DV) providers; they are prohibited from entering data on their clients into a Homeless Management Information System (HMIS) yet are required to use a comparable database

to collect and report on universal and program-specific data elements. The Community Management Information System (CMIS) developed and administered by IHFA provides this functionality for the state's DV providers.

Coordinated Entry System (CES) – Known as Homeless Connect in the Balance of State Continuum of Care and Our Path Home CONNECT in the Ada County/Boise City CoC. The system facilitates the coordination and management of resources and services through the crisis response system. CES allows users to efficiently and effectively connect people to interventions that aim to rapidly resolve their housing crisis. CES works to connect the highest need, most vulnerable persons in the community to available housing and supportive services equitably.

Emergency Shelter – 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.

Employee Compensation – Employee compensation includes payroll-related expenses, such as:

- Employer portion of Social Security tax
- Employer portion of Medicare tax
- State and federal unemployment tax
- Worker compensation insurance
- Employer portion of insurance (health, dental, vision, life, disability)
- Employer paid holidays, vacations, and sick days
- Employer contributions toward retirement plans

To allocate these costs, first determine the program component under which these costs fall; then allocate the costs to an activity within the component. For example, staff time expended on processing checks for utility payments for program participants could be eligible under the rapid re-housing component or the homelessness prevention component; the activity would be housing relocation and stabilization services. If processing checks for both components (rapid re-housing and homelessness prevention), staff time should be reimbursed in proportion to the actual hours worked on each ESG component. (See 2 CFR 200. 431 for more information regarding compensation and fringe benefits)**Homeless** – There are 4 categories within the definition of homelessness, as defined under the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act). The three categories that apply to the ESG program include:

Category 1: Literally homeless. Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- Has a primary nighttime residence that is a public or private place not meant for human habitation;
- Is living in a 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 and local government programs);
- or
- Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place

Category 2: Imminent risk of homeless. Individual or family who will imminently lose their primary nighttime residence, provided that:

- Residence will be lost within 14 days of the date of application for homeless assistance;
- No subsequent residence has been identified; and
- The individual or family lacks the resources or support networks needed to obtain other permanent housing

Category 4: Fleeing/attempting to flee domestic violence. Any individual or family who:

- Is fleeing, or is attempting to flee, domestic violence;
- Has no other residence; and
- Lacks the resources or support networks to obtain other permanent housing

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

Homelessness Prevention – Financial assistance, rental assistance, and services provided to individuals and families who are at imminent risk, or at risk of homelessness.

Household – A single individual or a group of persons who live together in one dwelling unit.

Housing First – An approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment or service participation requirements. 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.

Mainstream Resources – Commonly available resources within the community. Subrecipients must coordinate and integrate, to the maximum extent practicable, ESG-funded activities with mainstream housing, health, social services, employment, education, and youth programs for families and individuals that are currently homeless or at risk of homelessness. Examples of these programs include:

- Public housing programs assisted under section 9
- Housing programs receiving tenant-based or project-based assistance under section 8
- Supportive Housing for Persons with Disabilities
- HOME Investment Partnerships Program
- State Children's Health Insurance Program
- Medicaid/Medicare
- Mental Health and Substance Abuse Programs
- Supplemental Nutrition Assistance Program
- Services funded under the Workforce Investment Act
- Federal-State Unemployment Insurance Program
- Social Security Disability Insurance
- Supplemental Security Income
- Temporary Assistance for Needy Families (TANF)
- Women, Infants and Children

- Child and Adult Care Food Program
- Head Start

Participants – A homeless or at-risk of homeless individual or family who receive ESG assistance.

Rapid Re-housing – 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.

Subrecipient – A non-profit organization that enters into a subrecipient agreement with IHFA to provide homeless services as outlined in the ESG application proposal.

APPENDIX B: Applicable Federal Requirements

Listed below are some of the federal requirements that apply to the ESG grant program. The list of regulations, as well as the description of each, is not all-inclusive or verbatim; some descriptions have been shortened or altered for readability. To obtain a thorough understanding of the regulations that govern the ESG grant, visit: <https://www.law.cornell.edu/cfr/text/24/part-576>

2 CFR Part 200 - Uniform administrative requirements, cost principals, and audit requirements for federal awards

Subrecipients must follow the policies, guidelines and requirements established in 2 CFR Part 200. Subrecipients' financial management systems shall provide for the following:

- Accurate, current, and complete disclosure of the financial results of each federally-sponsored project
- Records that identify adequately the source and application of funds for federally-sponsored activities
- Effective control over and accountability for all funds, property, and other assets

24 CFR § 5. 105 - Other federal requirements

Subrecipients must comply with all applicable fair housing and civil rights requirements, including, but not limited to, the Fair Housing Act, title VI of the Civil Rights Act of 1964, the Age Discrimination Act of 1975, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act. HUD-funded activities for housing shall be made available without regard to actual or perceived sexual orientation, gender identity, or marital status.

24 CFR § 5. 109 - Equal participation of faith-based organizations in HUD programs and activities

Faith-based organizations are eligible, on the same basis as any other organization, to participate in any HUD program or activity. Any organization that receives federal financial assistance under a HUD program or activity shall not, in providing services with such assistance or carrying out activities with such assistance, discriminate against a beneficiary or prospective beneficiary on the basis of religion, religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice.

24 CFR § 576. 102 - Emergency shelter component

Prohibition against involuntary family separation. The age of a child under age 18 must not be used as a basis for denying any family's admission to an emergency shelter that uses Emergency Solutions Grant (ESG) funding or services and provides shelter to families with children under age 18.

24 CFR § 576. 102(b) - Prohibition against involuntary family separation.

The age, of a child under age 18 must not be used as a basis for denying any family's admission to an emergency shelter that uses Emergency Solutions Grant (ESG) funding or services and provides shelter to families with children under age 18.

24 CFR § 576. 400 - Area-wide systems coordination requirements

Centralized or coordinated assessment. Once the Continuum of Care has developed a centralized assessment system or a coordinated assessment system in accordance with requirements to be established by HUD, each ESG-funded program or project within the Continuum of Care's area must

use that assessment system. The recipient and subrecipient must work with the Continuum of Care to ensure the screening, assessment and referral of program participants are consistent with the written standards.

Participation in HMIS. The subrecipient must enter data on all persons served and all activities assisted under ESG into the applicable community-wide HMIS in the area in which those persons and activities are located, or a comparable database, in accordance with HUD's standards on participation, data collection, and reporting under a local HMIS. If the subrecipient is a domestic violence service provider, it may use a comparable database that collects client-level data over time and generates unduplicated aggregate reports based on the data.

24 CFR § 576. 401 - Evaluation of program participant eligibility and needs

Evaluation and Re-evaluations. The subrecipient must conduct an initial evaluation to determine the eligibility of each individual or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing. The recipient or subrecipient must re-evaluate the program participant's eligibility and the types and amounts of assistance the program participant needs not less than once every 3 months for program participants receiving homelessness prevention assistance, and not less than once annually for program participants receiving rapid re-housing assistance.

Connecting program participants to mainstream and other resources. The subrecipient must assist each program participant, as needed, to obtain appropriate supportive services, including assistance in obtaining permanent housing, medical health treatment, mental health treatment, counseling, supervision, and other services essential for achieving independent living; and other Federal, State, local, and private assistance available to assist the program participant in obtaining housing stability.

Housing stability case management. While providing homelessness prevention or rapid re-housing assistance to a program participant, the subrecipient must require the program participant to meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability, and develop a plan to assist the program participant to retain permanent housing after the ESG assistance ends.

24 CFR § 576. 402 - Terminating assistance

If a program participant who receives ESG assistance violates program requirements, assistance may be terminated in accordance with a formal process established by the subrecipient that recognizes the rights of the individuals affected.

24 CFR § 576. 403 - Shelter and housing standards

Subrecipients are responsible for the performance of inspections to ensure that shelter and housing occupied by ESG participants meets the following standards.

- (a) Lead-based paint remediation and disclosure
- (b) Minimum standards for emergency shelters
 1. Structure and materials
 2. Access (shelter only)
 3. Space and security
 4. Interior air quality

5. Water supply
6. Sanitary facilities
7. Thermal environment
8. Illumination and electricity
9. Food preparation
10. Sanitary conditions
11. Fire safety

24 CFR §576. 404 – Conflicts of interest

The provision of any type or amount of ESG assistance may not be conditioned on an individual's or family's acceptance or occupancy of emergency shelter or housing owned by the subrecipient, or a parent or subsidiary of the subrecipient. For the procurement of goods and services, the recipient and its subrecipients must comply with 2 CFR 200. 317 and 200. 318.

24 CFR §576. 405 – Homeless participation

The subrecipient must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policy-making entity of the recipient, to the extent that the entity considers and makes policies and decisions regarding any facilities, services, or other assistance that receive funding under Emergency Solutions Grant (ESG).

24 CFR § 576. 407 - Other federal requirements

Affirmative outreach. The recipient or subrecipient must make known that use of the facilities, assistance, and services are available to all on a nondiscriminatory basis. The recipient and its 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, recipients and sub recipients are also required to take reasonable steps to ensure meaningful access to programs and activities for limited English proficiency (LEP) persons.

Environmental review. ESG activities are subject to environmental review under 24 CFR part 50. The subrecipient shall supply all available, relevant information necessary to perform for each property any environmental review required by 24 CFR part 50.

24 CFR § 576. 500 - Recordkeeping and reporting requirements

The subrecipient must have policies and procedures to ensure the requirements of this part are met, including those required by 2 CFR part 200. The policies and procedures must be established in writing and implemented by the subrecipient to ensure that ESG funds are used in accordance with the requirements. In addition, sufficient records must be established and maintained to enable the recipient and HUD to determine whether ESG requirements are being met. Subrecipients are required to show compliance with the program's regulations, including documentation for the following:

1. Homeless status
2. At risk of homelessness status
3. Determination of ineligibility
4. Annual income
5. Program participant records

6. Centralized or coordinated assessment systems and procedures
7. Rental assistance agreements and payments
8. Utility allowance
9. Shelter and housing standards
10. Emergency shelter facilities
11. Services and assistance provided
12. Coordination with Continuum of Care and other programs
13. HMIS
14. Matching
15. Conflicts of interest
16. Homeless participation
17. Faith-based activities
18. Other federal requirements
19. Relocation
20. Financial records
21. Confidentiality

APPENDIX C: Summary of ESG Eligible Costs

Shelter, Homeless Prevention and Rapid Rehousing Grants	
HMIS (24 CFR 576. 107)	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. (24 CFR 576. 108)	Salaries and wages related to general management, oversight, coordination, monitoring and evaluation of grant project.
	Administrative services performed under third-party contracts or agreements, including general legal services, accounting services and audit services.
	Costs for goods and services required for administration of the project, including rental or purchase of equipment, insurance, utilities, office supplies, and rental and maintenance (but not purchase) of office space.
	Costs of providing training on ESG requirements and attending HUD-sponsored ESG trainings.

Specific to Emergency Shelter Grants	
Emergency Shelter (24 CFR 576. 102)	<p>ESG funds may be used to provide essential services to individuals and families, and operating emergency shelters.</p> <p>Participants must meet one of the following:</p> <ol style="list-style-type: none"> 1. Category 1: Literally Homeless 2. Category 2: Imminent Risk of Homelessness 3. Category 4: Fleeing/attempting to Flee Domestic Violence
Essential Services	
Case Management	The cost of assessing, arranging, coordinating and monitoring the delivery of individualized services to meet the needs of the program participant.
	Using the centralized or coordinated assessment system.
	Conducting the initial evaluation, 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	The costs of childcare for program participants, including providing meals and snacks, and comprehensive and coordinated sets of appropriate developmental activities.

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).
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; ; 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.
	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, 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.
	Travel costs to accompany or assist program participants to use public transportation.
Operations	
Maintenance	Staff or contractor time related to maintenance, including the oversight of maintenance activities. Eligible activities include cleaning; minor or routine

	repairs of furnishings, equipment, and fixtures; and protective or preventative measures to keep a building, its systems, and its grounds in working order. Maintenance activities do not materially add to the value of the building/property.
Security	Staff time related to shelter security and oversight of security staff. Security staff are responsible for the safety of shelter residents and property. Other expenses related to safety, such as fire department inspections and security cameras, are eligible.
Insurance	Insurance maintained by the organization in connection with the general conduct of its shelter operations are allowable.
Rent & Utilities	Rent and utilities for the shelter property. Eligible utilities include gas, electric, water, sewage, trash, telephone and internet.
Equipment & Furnishings	Items necessary for shelter operations are eligible.
Food & Supplies	Reasonable food for shelter residents. Supplies include cleaning supplies and other items for program participants such as bed linens and towels.
Hotel/Motel Vouchers	Where no appropriate emergency shelter is available for a homeless family or individual, eligible costs may also include vouchers for temporary stays.

Specific to Homeless Prevention Grants	
Homeless Prevention (24 CFR 576. 103)	<p>ESG funds may be used to provide services and rental assistance necessary to prevent an individual or family from moving into an emergency shelter or becoming homeless.</p> <p>Participants must meet one of the following:</p> <ol style="list-style-type: none"> 1. Category 2: Imminent Risk of Homelessness 2. Category 4: Fleeing/Attempting to Flee Domestic Violence <p>Participant income must be at or below 30% of area median income (AMI)</p>
Rental Assistance (24 CFR 576. 106)	<p>Rental assistance and payment of rental arrears (consisting of a one-time payment for up to 6 months), is eligible.</p> <p>Participants are only eligible for financial assistance up to 6 months during any 1-year period.</p>
Housing Relocation and Stabilization <u>Financial</u> (24 CFR 576. 105)	<p>Eligible expenses include rental application fees, security deposits (no more than 2 mo. rent), last month's rent, utility deposits, utility payments, utility arrears. Eligible utilities include gas, electric, water and sewage.</p> <p>Participants are only eligible for financial assistance up to 6 months during any 1-year period.</p>
Housing Relocation and Stabilization <u>Services</u> (24 CFR 576. 105)	<p>Housing Search and Placement – Support program participants in locating, obtaining, and retaining suitable permanent housing. This includes: assessment of housing barriers, needs, and preferences, development of an action plan, housing search, outreach to and negotiation with owners, assistance with submitting documents and assessment of housing for compliance with ESG requirements.</p> <p>Participants are limited to 9 months of services during any 1-year period.</p> <p>Housing Stability Case Management - 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 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.</p> <p>Participants are limited to 9 months of services during any 1-year period.</p>

Specific to Rapid Rehousing Grants	
Rapid Rehousing (24 CFR 576. 104)	<p>ESG funds may be used to provide services and rental assistance necessary to prevent an individual or family move as quickly as possible into permanent housing and achieve stability in that housing.</p> <p>Participants must meet one of the following:</p> <ol style="list-style-type: none"> 1. Category 1: Literally Homeless 2. Category 4: Fleeing/Attempting to Flee Domestic Violence <p>Participant income must be at or below 50% of area median income (AMI).</p>
Rental Assistance (24 CFR 576. 106)	<p>Rental assistance and payment of rental arrears (consisting of a one-time payment for up to 6 months), is eligible.</p> <p>Participants are only eligible for financial assistance up to 24 months during any 3-year period.</p>
Housing Relocation and Stabilization <u>Financial</u> (24 CFR 576. 105)	<p>Eligible expenses include rental application fees, security deposits (no more than 2 mo. rent), last month's rent, utility deposits, utility payments, utility arrears. Eligible utilities include gas, electric, water and sewage.</p> <p>Participants are only eligible for financial assistance up to 24 months during any 3-year period.</p>
Housing Relocation and Stabilization <u>Services</u> (24 CFR 576. 105)	<p>Housing Search and Placement – Support program participants in locating, obtaining, and retaining suitable permanent housing. This includes: assessment of housing barriers, needs, and preferences, development of an action plan, housing search, outreach to and negotiation with owners, assistance with submitting documents and assessment of housing for compliance with ESG requirements.</p> <p>Participants are limited to 30 months of services during any 3-year period.</p> <p>Housing Stability Case Management - 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 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.</p> <p>Participants are limited to 30 months of services during any 3-year period.</p>