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Chapter 4

Supportive Services

IHFA will use HOME ARP funding to provide supportive services for qualifying individuals or families as a standalone activity.

Eligible Program Participants

Supportive services may be provided to individuals and families who meet definitions of a qualifying population <u>and</u> who are not already receiving these services through other programs. Qualifying populations must not be forced into receiving supportive services.

Client Selection

Supportive service grant subrecipient providers will need to ensure qualifying populations are:

- 1) Eligible based on the initial determination of meeting the definition(s);
- 2) Not already receiving supportive services with another program (see Ineligible Costs for further explanation);
- 3) Complete a form to ensure there is no duplication of benefits; and
- 4) Ensure there are transition plans with other agencies or service providers for continuity of care when there is termination of supportive services.

Client files must contain (at a minimum):

- Application
- Determination of meeting qualifying population definition
- Income (if no income, self-certification)
- Identification of supportive service needs
 - Documentation of referrals
- Case management notes/goals

Eligible Supportive Services

IHFA's eligible supportive services are adapted from those found in Section 401 (29) of McKinney-Vento.

Case Management

Staff costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participants. The subrecipient must have written standards for providing the assistance, preferable based on best practices or national standards. *Must have/show certifications as required by certifying bodies*.

- O Developing, securing, and coordinating services;
- Securing services;
- Obtaining Federal, State, or local benefits;
- o Providing information and referrals to other providers;
- Ongoing risk assessments and safety planning with victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking;
- O Developing an individualized housing and service plan;
- O Using the centralized or coordinated assessment system.

Ineligible Costs

Qualifying populations who are receiving the same services through other public sources are not eligible to receive HOME ARP supportive services. *Example: if a qualifying individual or family receives a project-based/Section 8 voucher and case management is provided; then the household cannot use HOME ARP funds for case management.*

Eligible Costs of Supportive Services for Qualifying Individuals and Families

HOME ARP supportive services must provide necessary assistance to qualifying populations, prevent homelessness, or enable qualifying populations to obtain and maintain housing. Only supportive services outlined in the written agreement between IHFA and the subrecipient are eligible for reimbursement. Reimbursements must be submitted every 30 days and eligible costs must have been incurred in the last 60 days.

HOME ARP funds will <u>only</u> pay for the staff salaries, wages, benefits, etc. who directly administer the supportive services (this is separate from operating or capacity building grants). Time spent working with ineligible populations <u>cannot</u> be billed to supportive services. The organization will have to have other funding sources to cover the time. Detailed tracking is <u>required</u> for time spent with HOME ARP eligible clients. Failure to do so may result in paying back funds to IHFA.

All supportive service costs must be necessary and reasonable, as found in 2 CFR 200, Subpart E. If a qualifying individual or household is already receiving the same eligible supportive service <u>or</u> has been approved to receive the same service through another program; then there is not a need for HOME ARP supportive services and will not be reimbursed by IHFA.

Organization Requirements

Subrecipients are eligible to apply for HOME ARP funds supporting direct costs eligible for supportive services. The organization must have, but is not limited to:

- Documented non-profit status with the IRS
- Policies and procedures for the eligible supportive services
- Organizational policies and procedures conforming with 2 CFR 200, Subpart D, including but not limited to:
 - o Providing annual financial audits
 - Internal controls
 - Separation of duties
 - Conflict of interest provisions
 - Procurement
 - o Record retention
- An ability to be reimbursed for eligible costs
- Maintain client records

Wages and Benefits

IHFA will reimburse for the time spent working with qualifying populations who receive supportive services (as outlined in the written agreement) from the subrecipient. The subrecipient will need to:

- Provide detailed time records of employees working on HOME ARP supportive services for qualifying individuals or households
- Provide documentation demonstrating the paid amounts of an employee's time, taxes, benefits, etc.

Termination of Assistance

The subrecipient may terminate assistance to a qualifying participant accessing supportive services who violates program requirements or no longer needs the services as determined by the non-profit. Termination under this section does not bar the subrecipient from providing further assistance at a later date to the same individual or family.

Due Process

The subrecipient must establish policies and procedures for the termination of assistance to program participants. When terminating assistance to a program participant, the subrecipient must provide a formal process recognizing the rights of individuals receiving assistance under the due process of law. This process, at a minimum, must consist of:

- (1) Providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance;
- (2) Written notice to the program participant containing a clear statement of the reasons for termination;
- (3) A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of the person) who made or approved the termination decision; and
- (4) Prompt written notice of the final decision to the program participant.

During this process, effective communication and accessibility for individuals with disabilities must be provided, including a provision for reasonable accommodations. Similarly, the non- profit must provide meaningful access to persons with Limited English Proficiency.

Required Reimbursement Documentation

IHFA will reimburse subrecipient for the eligible supportive services agreed upon in the subrecipient grant agreement. For an expense to be eligible for reimbursement the subrecipient must include proof of payment, all pages of all documents, even if blank, and all documents must be signed and dated. Below is the minimum required documentation for each eligible activity.

Case Management

- Signed and approved staff time cards with time attributable to assisting qualifying populations
- Staff paystubs, payrolls summary or proof of payment

Application Scoring

Applications will be available after the Administration Plan for HOME ARP Supportive Services is approved. Provided in this section is the scoring criteria for subrecipients who *might* be applying for assistance.

IHFA reserves the right not to review incomplete applications submitted by organizations.

Minimum Threshold Requirements

- 1. Training Certificate of Completion/Attendance for organization staff for the previous 12 months
- 2. Resume(s)/Statement of Experience for all key development staff who will be involved with supportive service activities
- 3. Board resolution authorizing application for this Supportive Services Grant
- 4. Organizational Plan or agency information demonstrating the application aligns with goals and objectives relative to the development of supportive services
- 5. CPA-Reviewed Financial Statements submitted. IHFA will ensure subrecipient has adequate financial management systems and practices in place as well as sufficient financial resources to carry out the project to completion
- 6. Proposed operating budget for the year in which the funding is requested. The budget must include anticipated sources of revenue, including funds provided by other intermediaries for organizational support and/or housing education.

Supportive Services Grant Scoring Criteria			
	Yes	No	
Received Supportive Services Grant in prior years from HOME ARP? (10 Pts)			
Provides services to persons outside the city of Boise, Idaho. (10 Pts)			
Provides services to eligible households beyond a municipality. Make sure to describe in the narrative the service area covered. (10 Pts)			
Will have necessary staff to provide documented supportive services for eligible household (30 Pts)			
If you answered "No" to all the questions above, please contact <u>HOMEARP@ihfa.org</u> for additional information.			
Anticipated request as a % of organization's total operating budget:			
0 – 29% (10 Pts)	Up to 10		
30 – 49% (5 Pts)		Points	
Over 50% (0 Pts)			
The organization will <u>not</u> receive supportive services assistance from any other federal source (SHOP, USDA-RD, HUD, CoC, ESG, NeighborWorks, etc.) this year.		20 Points	
Has identified a plan to minimize the reduction in workforce as a result of no longer receiving HOME ARP support in Year 4?			
Has professional staff who have successfully provided supportive services for income restricted households in the past.		15 Points	
The subrecipient's support to participants is adequate based on evidence provided in file reviews and monitoring review. (10 Pts) Each of the supportive services provided in year two have adequate policies based on monitoring report and feedback. (10 Pts)		Up to 45 Points	
Staff working on HOME ARP have knowledge to ensure compliance with HOME ARP requirements, including but not limited to: definition of homelessness (which is different than CoC/ESG), duplication of benefits, and internal policies and procedures. (10 Pts)	Tomts		
In the event of new staff, due to transition, the agency has an onboarding plan (provide as part of application if applicable) to ensure HOME ARP is understood for compliance. (15 Pts)			

Submitted reimbursement requests by the 15 th of each month (10 Pts) Implemented HOME ARP requirements successfully, based on monitoring report feedback (15 Pts)	Up to 25 Points	
TOTAL MAXIMUM POINTS APPLICANT	175 Points	

Note: The minimum point threshold is 105 points for funding consideration. Applications scoring less than threshold will be declined.