
IDAHO
HOMELESSNESS
COORDINATING
COMMITTEE

WRITTEN
STANDARDS

Updated: April 2021



Counties represented in each region:

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: Bannock, Bear Lake, Bingham, Caribou, Franklin, Oneida, Power

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

Region 7: Ada

Contents

INTRODUCTION	6
SECTION 1: SYSTEM OVERVIEW	6
1. ROLES AND RESPONSIBILITIES	7
2. HOUSING FIRST APPROACH.....	7
SECTION 2: PROGRAM ELIGIBILITY AND REQUIREMENTS	11
1. ALL PROGRAMS	11
1A. CONSIDERATIONS FOR SPECIAL POPULATIONS.....	11
2. EMERGENCY SOLUTIONS GRANTS PROGRAM (24 CFR 576)	12
2A. Income Determination:	12
2B. Shelter Component.....	12
2C. Homelessness Prevention Component.....	13
2D. Rapid Rehousing Component	14
2E. References	17
3. CONTINUUM OF CARE PROGRAM.....	17
3A. Income Determination	17
3B. Permanent Supportive Housing Component.....	18
3C. Transitional Housing Component.....	21
3D. Rapid Rehousing Component	23
3E. References	27
4. OTHER APPLICABLE FEDERAL REGULATIONS	27
4A. Conflicts of Interest	27
4B. Homeless Participation.....	28
4C. Faith-Based Activities	28
4D. Prohibition against Involuntary Family Separation	28
4E. Nondiscrimination/Equal Opportunity/Affirmative Outreach	29
4F. Termination/Grievance	29
4G. Connection with Mainstream and Other Resources	29
4H. Environmental Review.....	29
4I. Lead Based Paint.....	30
SECTION 3: PROGRAM MONITORING.....	31
1. TYPES OF MONITORING.....	31
1A. Program Compliance	31

1B. HMIS Privacy and Security Monitoring.....	32
2. RECORDKEEPING.....	32
3. REPORTING	34
3A. HMIS or Comparable Database	34
3B. APR.....	35
3C. Quarterly Data Quality Reporting.....	35
4. CONFIDENTIALITY (24 CFR Part 578.103(b)).....	35
5. ACCESS TO RECORDS (24 CFR Part 578.103(d)).....	35
6. GRANT AND PROJECT CHANGES.....	36
SECTION 4: SYSTEM WIDE PERFORMANCE.....	37
1. PERFORMANCE MEASUREMENT	37
2. ROLES AND RESPONSIBILITIES	37
3. STRATEGY.....	38
4. GOVERNANCE	40
5. STRATEGIC RESOURCE ALLOCATION	40
5A. CoC Review & Ranking.....	41
5B. Performance Goals:	41
5C. Reallocations or Repurposing of CoC Funds.....	41
5D. New Projects.....	42
6. APPLICATION PROCESS.....	43
6A. Application.....	43
6B. Solicitation	43
6C. Review Panel.....	43
6D. Application Briefing	43
6E. Project Priority Listing.....	44
6F. Funding Announcements.....	44
SECTION 5: COORDINATED ENTRY	44
1. PURPOSE.....	44
2. GOALS AND GUIDING PRINCIPLES	45
2A. Goals of the CES.....	45
2B. Guiding Principles of the CES.....	45
3. SYSTEM PARTICIPATION	45
APPENDIX.....	46
APPENDIX A: GLOSSARY OF TERMS	47
APPENDIX B: HUD CRITERIA FOR DEFINING HOMELESS.....	50

APPENDIX C: DEFINITION OF CHRONIC HOMELESSNESS.....	52
APPENDIX D: ACRONYM LIST	53
APPENDIX E: CROSSWALK OF HUD HOMELESS AND AT RISK DEFINITIONS AND ELIGIBILITY TO ESG PROGRAM COMPONENTS	55
APPENDIX F: ESG LINE ITEM DETAIL	56
APPENDIX G: CoC LINE ITEM DETAIL.....	62
ADDENDUM.....	67

INTRODUCTION

The Idaho Balance of State Continuum of Care has developed the following standards for providing assistance with Continuum of Care (CoC) and Emergency Solutions Grants (ESG) funds. The name of the Idaho Balance of State Continuum of Care is the Idaho Homelessness Coordinating Committee (IHCC). The IHCC 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 Continuum of Care (CoC) Regulations, the Emergency Solutions Grant (ESG) Rules and Regulations, and the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act all require the IHCC, in consultation with the recipients of ESG program funds within the geographic area, to have written policies and procedures that govern the provision of assistance to individuals and families. These policies and procedures provide guidance to local providers in delivering ESG and CoC funded assistance.

These policies and procedures 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 HUD-funded providers must follow the Interim Regulations for both COC and ESG in their entirety, as well as these Written Standards.

Each ESG and CoC funded service provider shall comply with the minimum standards established by the IHCC; although, each provider may decide to set standards on their provision of ESG/CoC that exceed these minimum requirements, as long as those standards do not conflict with the Housing First focus set forth in this document.

These Written Standards have been established to ensure that persons experiencing homelessness who enter programs throughout the Idaho Balance of State will be given similar information and support to access and maintain permanent housing.

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 IHCC which will assist programs to meet and exceed performance outcomes, equipping the CoC to reach the goal of ending homelessness.

SECTION 1: SYSTEM OVERVIEW

The Continuum of Care Program (CoC) is authorized by the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act), 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 Continuum of Care planning process.

Idaho's Balance of State CoC 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 CoC. 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. These Written Standards, based on both federal and local strategies and goals, exist to respond to both

the challenges that counter our efforts and the misfortune of those who are at risk of becoming or have become homeless.

1. ROLES AND RESPONSIBILITIES

Subrecipients must comply with any and 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 Principals, and Audit Requirements for Federal Awards.

Subrecipients must agree to refer participants to mainstream resources, as applicable. Subrecipients are required to use the Homeless Connect system as approved by the Continuum of Care.

Subrecipients should include in their program agreements which are signed by participants an acknowledgment that, should a subrecipient discontinue operating a project within the Continuum of Care, all information regarding housing and services provided by ESG or COC funding will be transferred to IHFA as the Recipient, or an identified and approved subsequent subrecipient. This will ensure timely and appropriate continuation of housing and services as covered within this Continuum of Care and compliance with program recordkeeping requirements.

Subrecipients must agree to participate in the 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 Continuum of Care in each region and throughout 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 IHFA. Attendance and participation will be verified, and may affect funding awards.

Subrecipients must participate in Idaho's Homelessness Management Information System (HMIS) or Community Management Information System (CMIS), collecting and reporting all HUD-required universal data elements and program specific data elements, as well as adhere to IHCC-imposed data collection requirements. These Written Standards authorize the ESG and CoC recipient, IHFA, to administer a comparable database, which is the CMIS, for agencies 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 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 CMIS privacy standards and data entry requirements.

2. HOUSING FIRST APPROACH

The most successful model for housing people who experience homelessness is permanent supportive housing using a "Housing First" approach, which is a participant-driven strategy that provides immediate access to housing without requiring participation in psychiatric treatment, treatment for sobriety, or other service participation requirements. After settling into housing, participants are offered a wide range of supportive services that focus primarily on helping them

maintain their housing, but retention in housing is not conditioned on acceptance of or adherence with services.

Housing First permanent supportive housing models are typically designed for individuals or families who have complex service needs, who are often turned away from other affordable housing settings, and/or who are the least likely to be able to proactively seek and obtain housing on their own. Housing First approaches for rapid rehousing provide quick access to permanent housing through interim rental assistance and supportive services on a time-limited basis. All permanent housing projects should have low barriers to program admission and serve individuals and families without consideration of past rental, credit, or financial history.

The Housing First approach has also evolved to encompass a community-level orientation to ending homelessness in which barriers to housing entry are removed and efforts are in place to prioritize those with the greatest lengths of time homeless and with the greatest needs for housing assistance.

HUD encourages all recipients of CoC and ESG funded programs to follow a Housing First approach to the maximum extent practicable.

All CoC and ESG funded projects must adhere to at least the minimum Housing First standards established below (I-VII). Subrecipients are encouraged to adopt and institute additional Housing First practices when practicable. Projects awarded CoC funding that require Housing First Standards are required to follow Housing First principles, and meet any conditions set forth by HUD in the Notice of Funding Availability (NOFA) under which the project was funded. Subrecipients must ensure project policies include the following core Housing First components, which will be subject to monitoring:

- I. Few to no programmatic prerequisites to permanent housing entry**
 - a. People experiencing homelessness are offered permanent housing with no programmatic preconditions such as demonstration of sobriety, completion of alcohol or drug treatment, or agreeing to comply with a treatment regimen upon entry into the program, unless mandated to do so by federal, state, or local funding requirements.
 - b. People are also not required to first enter a transitional housing program in order to enter permanent housing.
- II. Low-barrier admission policies**
 - a. Permanent supportive housing's admissions policies are designed to "screen-in" rather than "screen-out" applicants with the greatest barriers to housing. For example, projects should not restrict participation due to having no or very low income, poor rental history and past evictions, or criminal histories. Criminal history may be subject to a case-by-case review and decision by organization executives.
 - b. Housing programs may have tenant selection policies that prioritize people who have been homeless the longest or who have the highest service needs as evidenced by vulnerability assessment or the high utilization of crisis services.
- III. Rapid and streamlined entry into housing**
 - a. Many people experiencing chronic homelessness may experience anxiety and uncertainty during a lengthy housing application and approval process. In order to improve this, Housing First models strive to help people experiencing homelessness move into permanent housing as quickly as possible, streamlining application and approval processes, and reducing wait times.

IV. Supportive services are voluntary, but can and should be used to persistently engage tenants to ensure housing stability

- a. Appropriate supportive services are proactively identified and offered through regular contact to help tenants achieve and maintain housing stability; however, tenants are not required to participate in case management or other services as a condition of tenancy. The subrecipient may, however, schedule regular visits to assess the needs of the tenant so that appropriate services may be offered, and referrals made if desired.
- b. Techniques such as harm reduction, trauma-informed care, and motivational interviewing are encouraged. Harm reduction techniques can confront and mitigate the harms of drug and alcohol use through non-judgmental communication and education, while motivational interviewing may be useful in helping households acquire and utilize new skills and information. Trauma-informed care is not a therapy or an intervention, but a principle-based, culture change process aimed at recognizing strengths and resiliency as well as helping people who have experienced trauma to overcome those issues in order to lead healthy and positive lives. Motivational interviewing is a goal-oriented, client-centered counseling style for eliciting behavior change by helping clients to explore and resolve ambivalence.

V. Tenants have full rights, responsibilities, and legal protections

- a. The ultimate goal of the Housing First approach is to help people experiencing homelessness achieve long-term housing stability in permanent housing.
- b. Permanent housing is defined as housing where tenants have leases that confer the full rights, responsibilities, and legal protections under federal, state, and local housing laws.
- c. Tenants are educated about their lease terms, connected to legal assistance, and encouraged to exercise their full legal rights and responsibilities.
- d. Landlords and providers in Housing First models abide by their legally defined roles and obligations. For instance, landlords and providers do not enter tenants' apartments without tenants' knowledge and permission except under legally-defined emergency circumstances, or as required by various housing programs (e.g., HOME and Low-Income Housing Tax Credit programs require 24-hour notice to conduct inspections for health and safety purposes).
- e. Many Housing First permanent supportive housing programs also have a tenant association or council to review program policies and provide feedback, and formal processes for tenants to submit suggestions or grievances.

VI. Practices and policies to prevent lease violations and evictions

- a. Housing First supportive housing programs should incorporate practices and policies that prevent lease violations and evictions among tenants. For instance, program policies consistent with a Housing First approach do not consider alcohol or drug use in and of itself to be lease violations, unless such use results in disturbances to neighbors or is associated with illegal activity (e.g., selling illegal substances), or a health or safety risk to the tenant or others. Housing First models may also have policies that give tenants some flexibility and recourse in the payment of rent, which in many subsidized housing programs is 30% of the participant's income. For example, rather than moving towards eviction proceedings due to missed rent payments, programs may allow tenants to enter into payment installment plans for rent arrearages, or offer money management assistance to tenants (e.g., alternative due dates).

VII. Applicable in a variety of housing models

- a. The Housing First approach can be implemented in different types of permanent supportive housing and rapid rehousing settings, including scattered-site models in private market apartments where rental assistance is provided and tenants have access to mobile and site-based supportive services; single-site models in which permanent supportive housing buildings are newly constructed or rehabilitated and tenants have access to voluntary onsite services; and set-asides, where supportive services are offered to participants in designated units within affordable housing developments. Emergency shelters should also strive to implement Housing First approaches in the delivery of housing and services.
- b. Participants shall be given choice in their housing, subject to program requirements and limitations.
- c. Participants are not required to participate in services, but providers are required to regularly and consistently seek to engage participants, and to perform assessments/evaluations to determine needs and offer or refer to appropriate services.
- d. Providers are encouraged to support staff in implementing evidence-based practices that support the Housing First model (e.g., Critical Time Intervention, Motivational Interviewing, Stages of Change).
- e. Applicants are not rejected on the basis of poor credit or financial history, poor or lack of rental history, criminal convictions, or behaviors that indicate a lack of “housing readiness.” Although applicants may be rejected due to convictions for violent criminal activity, this should occur on a case-by-case basis; agencies will not reject applicants with an overarching criminal activity screening (i.e., no felons); agencies will make all effort possible to remove barriers to program enrollment. A rejection is only appropriate when an applicant presents a direct threat to the health and safety of program staff and residents and that threat cannot be ameliorated. Rejected applicants will be given an opportunity to appeal the eligibility decision through the subrecipient’s grievance process.
- f. The Homeless Connect System promotes and supports Housing First practices by making referrals that are based on prioritization standards that identify persons with the greatest length of time homeless.
- g. Supportive services emphasize engagement and problem-solving over therapeutic goals. Services plans are highly tenant-driven without predetermined and/or universal goals. Participation in services or program compliance is not a condition of permanent supportive housing tenancy. Rapid rehousing programs may require case management as a condition of receiving rental assistance if required by state or federal funding.

SECTION 2: PROGRAM ELIGIBILITY AND REQUIREMENTS

1. ALL PROGRAMS

1A. CONSIDERATIONS FOR SPECIAL POPULATIONS

I. Victims of Domestic Violence

Special consideration should be made for Victims of Domestic Violence in relation to time limits in Emergency Shelter Facilities with lengths of stay allowable up to six months when extenuating factors are documented. These factors may include but are not limited to rural remoteness, lack of transportation, affordable or non-existent rental housing, job availability, safety, and support system. Extenuating circumstances should be noted in the tenant's file and documented as completely as possible.

II. Veterans

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

III. Youth

Providers of services for 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 CoC for housing and/or services will be connected with Idaho Department of Health and Welfare foster care resources and Runaway and Homeless Youth providers.

Eligibility

"Homeless Youth" includes all homeless persons age 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 providers from providing assistance to youth who meet the criteria in HUD's definition of homelessness. However, organizations 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;
- Offering short to medium term financial assistance; and

- Providing developmentally appropriate case management and services.

2. EMERGENCY SOLUTIONS GRANTS PROGRAM (24 CFR 576)

2A. Income Determination

Minimum standards for determination of an individual or family's annual income consist of calculating income in compliance with 24 CFR 5.609. Participant income must be at or below 50% of area median income (AMI), except for Homelessness Prevention participant income, which must be below 30% AMI. When participants are charged rent, the amount charged must be based on the participant's verified annual income from all sources.

In verifying income, ESG-funded providers 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.

2B. Shelter Component

The role of 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 CoC is to assist residents in moving from shelter into stable housing as quickly as possible. Housing planning should begin immediately upon entry to shelter, or prior to shelter entry should the household be engaged in outreach services.

I. Eligible Activities

A. Services (preferably not to exceed 30% of the total ESG award)

1. Essential services
2. Case management
3. Childcare
4. Education services
5. Employment assistance and job training
6. Outpatient health services
7. Life skills training
8. Mental health services
9. Substance abuse treatment services
10. Transportation

B. Operations

1. Maintenance
2. Rent
3. Security
4. Fuel
5. Equipment
6. Insurance
7. Utilities
8. Food
9. Furnishings

10. Supplies

C. Data Collection

D. Administrative Costs

II. Eligible Participants

Participants must meet one of the following:

1. Category 1: Literally Homeless
2. Category 2: Imminent Risk of Homelessness
3. Category 4: Fleeing/attempting to flee Domestic Violence

For additional details related to the HUD definition of homelessness and applicability to each program, see Appendix A & Appendix B.

2C. Homelessness Prevention Component

Homelessness Prevention assistance consists of financial assistance and supportive services to assist households in maintaining stable housing and avoid becoming homeless. Homelessness Prevention 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.

I. Eligible Activities

A. Financial Assistance:

1. Rent: Current rent owed as shown on lease.
2. Rental Arrears: Arrears with fees as listed on lease and eviction notice, up to 6 months.
3. Utility Payments (Arrears and Current): Standard utilities required in a participant's lease (i.e. gas, electric, water/sewage).
4. Cannot be provided for the same time period and cost type being provided by another federal, state, or local housing subsidy program (except one-time payment of arrears on tenant's portion of the rent).

B. Services:

1. Case Management: Assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability.
2. Housing Search & Placement: Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing.

C. Data Collection Costs: Costs related to contributing participant data to or maintaining data in the CoC's HMIS or CMIS for victim services providers are eligible costs under the HP program component. Eligible HMIS/CMIS costs include hardware, equipment and software costs; training and overhead; and staffing costs associated with contributing data to the HMIS designated by the CoC for its geographic area.

D. Time Limits:

1. Financial Assistance: Participants are only eligible for financial assistance up to 6 months during any 1-year period.
2. Services: Participants are limited to 9 months of services during any 1-year period.

II. Eligible Participants

Participants must meet one of the following:

1. Category 2: Imminent Risk of Homelessness

2. Category 4: Fleeing/Attempting to Flee Domestic Violence
 Additionally, household income must be below 30% AMI, and the household must lack resources and support networks that would prevent them from moving into an emergency shelter (retaining housing at re-evaluation) or other place described in Category 1 of the homelessness definition.
 For additional details related to the HUD definition of homelessness and applicability to each program, see Appendix A & Appendix B.

2D. Rapid Rehousing Component - 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.

I. Eligible Activities

- A. Financial Assistance:
 - 1. Rent: Current rent owed as shown on lease
 - 2. Rental Arrears: Arrears with fees as listed on lease and eviction notice if past eviction is prohibiting securing a new unit, up to 6 months
 - 3. Utility Payments (Arrears and Current): Standard utilities required in a participant’s lease (i.e., gas, electric, water/sewage)
 - 4. Cannot be provided for the same time period and cost type being provided by another federal, state, or local housing subsidy program (except one-time payment of arrears on tenants’ portion of the rent).
- B. Services:
 - 1. Case Management: Assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability.
 - 2. Housing Search & Placement: Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing.
- C. HMIS Costs: Costs related to contributing participant data to or maintaining data in the CoC’s HMIS or a comparable database for victim services providers are eligible costs under the PH program component. Eligible HMIS costs include hardware, equipment and software costs; training and overhead; and staffing costs associated with contributing data to the HMIS designated by the CoC for its geographic area.
- D. Time Limits:
 - 1. Financial Assistance: Participants are only eligible for financial assistance up to 24 months during any 3-year period.
 - 2. Services: Participants are limited to 30 months of services during any 3-year period.

II. Eligible Participants

Participants must meet one of the following:

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

For additional details related to the HUD definition of homelessness and applicability to each program, see Appendix A & Appendix B.

- A. Population-specific requirements:

- a) 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
- b) Housing history, education level, and employment history will also be considered when choice of transitional housing and rapid rehousing are both available
- c) Individuals who have repeated homeless episodes or the current homeless episode is more than 3 months
- d) Household incomes at or below 50% of area median income (AMI)

B. Payment Requirements

Prior to payment of rental assistance, the rental unit must pass the necessary inspections (Housing Quality Standards) and a lease established. 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 tenant/RRH 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 for both COC and ESG funding (24 CFR 982.507).

Short- to medium-term financial/rental assistance may be provided. Amounts may vary depending on household need. The total amount of financial assistance for one household may not exceed \$25,000 in a 3-year period.

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.

The project will pay the full cost of rent and the calculated utility allowance for participants in months 1, 2, and 3. Each month thereafter, assistance will be reassessed. If, based on rent-to-income ratio the participant is not able to pay full rent and utilities in months 3 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 program 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 program will be determined through agreement between the participants and funded housing providers. 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.

The following chart presents rent-to-income ratio ranges and the portion of rent for which an assisted household is responsible.

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

Rent-to-Income Ratio Range	Percentage of rent/utilities paid by household
50% or greater	0%
43-49%	25%
37-42%	50%
31-36%	75%
Less than 30%	100%

A household can only be eligible for this program 2 times in 3 years, and total rental assistance cannot exceed 24 months.

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

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.

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 housing authority 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, 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.

2E. Match

Under ESG, providers agree to match 100% of funds available under the Grant Agreement with funding from other sources. These sources may not come from other federal awards unless that award is designated by federal statute as one that may be used for matching. All match funds must be spent on ESG-eligible activities within the period of the Grant Agreement. The following are eligible types of match contributions:

I. Cash

II. In-Kind (noncash contributions)

- a. The value of any real property, equipment, goods, or services contributed to the subrecipient's ESG program, provided that if the recipient or subrecipient had to pay for them with grant funds, the costs would have been allowable. May also include the purchase value of any donated building.
- b. Costs paid by program income shall count toward meeting the recipient's matching requirements, provided the costs are eligible ESG costs that supplement the recipient's ESG program.

2F. 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/>

3. CONTINUUM OF CARE PROGRAM

The purpose of this 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.

3A. Income Determination

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 providers 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.

3B. Permanent Supportive Housing Component

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.

I. Eligible Activities

The following are eligible activities for Permanent Supportive Housing:

A. Leasing Costs

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 recipient, 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 recipient or the subrecipient and the landowner, with a sublease with the program participant. The recipient may, but is not required to, charge the program participant rent, consistent with the parameters specified in the Interim Rule.

B. Rental Assistance Costs

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 in the Idaho Balance of State CoC. 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. Recipients must serve as many program participants as identified in their funding application to HUD, but, if the 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.

1. **TBRA** program participants may select any appropriately sized unit within the CoC'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 CoC's geographic area.
2. **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.

3. **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 CoC'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.

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 housing authority 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, 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.

II. Supportive Services Costs

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.

Recipients and 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.

III. Operating Costs

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.

IV. HMIS/CMIS Costs

Costs related to contributing participant data to or maintaining data in the CoC's HMIS or CMIS are eligible costs under the PSH program component. Eligible HMIS/CMIS costs include hardware, equipment, and software costs; training and overhead; and staffing costs associated with contributing data to the HMIS/CMIS designated by the CoC for its geographic area.

V. Project Administration

A. Administrative Costs

HUD allows recipients and subrecipients to share up to 7 percent of any grant, excluding CoC planning and Unified Funding Agency (UFA) costs, for project administrative costs. These costs include expenses related to the overall administration of the grant (24 CFR part 578.59), such as management, coordination, monitoring, evaluation activities, and environmental review.

B. UFA Amendment Process

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

VI. Eligible Participants

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

1. Category 1 - Literally Homeless
2. Category 4 – Fleeing/Attempting to Flee Domestic Violence

For additional details related to the HUD definition of homelessness and applicability to each program, see Appendix A & Appendix B.

3C. Transitional Housing Component

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.

I. Eligible Activities

A. Leasing Costs

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 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 recipients or the subrecipient and the landowner, with a sublease with the program participant. The recipient may, but is not required to, charge the participant rent.

B. Rental Assistance Costs

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 Idaho Balance of State CoC. 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, but, if the 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.

1. **TBRA** program participants may select any appropriately sized unit within the CoC'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 CoC's geographic area.
2. **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.
3. **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 CoC'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 housing authority 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, 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.

C. Supportive Services Costs

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 PSH for the full period of their participation.

Recipients and 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.

D. Time Limits

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.

E. Operating Costs

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.

F. HMIS/CMIS Costs

Costs related to contributing participant data to or maintaining data in the CoC's HMIS or CMIS are eligible costs under the TH program component. Eligible HMIS/CMIS costs include hardware, equipment, and software costs; training and overhead; and staffing costs associated with contributing data to the HMIS/CMIS designated by the CoC for its geographic area.

G. Project Administration

The CoC allows recipients and subrecipients to share up to 7 percent of any grant, excluding CoC planning and Unified Funding Agency (UFA) costs, for project administrative costs. These costs include expenses related to the overall administration of the grant (24 CFR part 578.59), such as management, coordination, monitoring, evaluation activities, and environmental review.

II. Eligible Participants

A. Participants must meet one of the following:

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

For additional details related to the HUD definition of homelessness and applicability to each program, see Appendix A & Appendix B.

3D. Rapid Rehousing Component

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.

I. Eligible Activities

The following are eligible activities for RRH:

A. Rental Assistance Costs

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 Idaho Balance of State CoC. 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, but, if the 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 CoC's geographic area, although recipients or subrecipients may restrict the location under certain circumstances to ensure the availability of appropriate supportive services. Except for victims of domestic violence, program participants may not retain their rental assistance if they relocate to a unit outside the CoC's geographic area.

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 CoC's Written Standards.

B. Payment Requirements

Prior to payment of rental assistance, the rental unit must pass the necessary inspections (Housing Quality Standards) and a lease must be established. 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 tenant/RRH 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 for both COC and ESG funding (24 CFR 982.507).

Short- to medium-term financial/rental assistance may be provided. Amounts may vary depending on household need. The total amount of financial assistance for one household may not exceed \$25,000 in a 3-year period.

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.

The project will pay the full cost of rent and the calculated utility allowance for participants in months 1, 2, and 3. Each month thereafter, assistance will be reassessed.

If, based on rent to income ratio the participant is not able to pay full rent and utilities in months 3 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 program requirements and actively pursuing employment or mainstream resources for income, has gained employment, or are participating in job training or education.

Length of participation in the program will be determined through agreement between the participants and funded housing providers. 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.

The following chart presents rent-to-income ratio ranges and the portion of rent for which an assisted household is responsible.

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

Rent to Income Ratio Range	Percentage of rent/utilities paid by household
50% or greater	0%
43-49%	25%
37-42%	50%
31-36%	75%
Less than 30%	100%

A household can only be eligible for this program 2 times in 3 years and total rental assistance cannot exceed 24 months.

A vacancy payment may be made to pay rent for a maximum of 30 days from the end of the month in which the unit was vacated. Brief periods of stay in institutions, not to exceed 90 days per occurrence, are not considered vacancies.

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 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 housing authority 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, 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.

II. Supportive Services Costs

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 PH 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.

Recipients and 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. Reasonable one-time moving costs, including truck rental and hiring a moving company, are eligible costs.

C. Operating Costs

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.

D. HMIS/CMIS Costs

Costs related to contributing participant data to or maintaining data in the CoC's HMIS or CMIS are eligible costs under the RRH program component. Eligible HMIS/CMIS costs include hardware, equipment, and software costs; training and overhead; and staffing costs associated with contributing data to the HMIS/CMIS designated by the CoC for its geographic area.

E. Project Administration

HUD allows recipients and subrecipients to share up to 10 percent of any grant, excluding CoC planning and Unified Funding Agency (UFA) costs, for project administrative costs. These costs include expenses related to the overall administration of the grant (24 CFR part 578.59), such as management, coordination, monitoring, evaluation activities, and environmental review.

F. Eligible Participants

A. Participants must meet one of the following:

1. Category 1 - Literally Homeless
2. Category 4 – Fleeing/Attempting to Flee Domestic Violence

For additional details related to the HUD definition of homelessness and applicability to each program, see Appendix A & Appendix B.

3E. 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/>

5. OTHER APPLICABLE FEDERAL REGULATIONS

Conflicts of Interest

I. Procurement

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.

II. Continuum of Care Board Member

No Continuum of Care board member 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.

III. Organizational Conflict

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, as in paragraph (d) (1) of this section, 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 recipient or subrecipient participates in making rent reasonableness determinations and housing quality inspections of property that the recipient, subrecipient, or related entity owns. Each funded subrecipient will sign annually a contract attachment disclosing any potential conflicts of interest.

IV. Other Conflicts

For all other transactions and activities, the following restrictions apply: (1) 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.

4B. Homeless Participation

Minimum standards for participation of a homeless or formerly homeless person are:

- I. Each funded provider 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 provider.
- II. To the maximum extent possible, the provider shall involve homeless individuals and families in paid or volunteer work on the ESG or CoC-funded facilities, in providing services under ESG or CoC, and in providing services for occupants of ESG or CoC funded facilities.

4C. Faith-Based Activities

Minimum standards for faith-based activities are:

- I. Providers receiving ESG/CoC funding shall not engage in inherently religious activities as part of the ESG/CoC funded programs or services. Such activities must be offered separately from ESG/CoC funded programs and services and participation must be voluntary.
- II. A religious organization receiving ESG/CoC funding retains independence from government and may continue with its mission provided that ESG/CoC funds are not used to support inherently religious activities. An ESG/CoC funded organization retains its authority over its internal governance.
- III. An organization receiving ESG/CoC funding shall not discriminate against a participant or prospective participant based on religion or religious beliefs.
- IV. ESG/CoC 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 ESG/CoC eligible activities.

4D. 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 ESG or CoC (578.93(e)).

4E. Nondiscrimination/Equal Opportunity/Affirmative Outreach

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

4F. Termination/Grievance

Subrecipients may terminate CoC assistance to participants who violate program requirements. The agency 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 subrecipient 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 program participant's assistance is terminated only in the most severe cases.

I. Minimum standards for termination of assistance are:

- A. **General.** If a project violation occurs and the provider 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.
- B. **Due process rights for individuals and families facing project termination.**
When an ESG or CoC funded homelessness assistance project seeks to terminate participation for any household, the required formal process shall minimally consist of:
 - 1. Written notice clearly stating the reasons for termination and restating remedies attempted to avoid termination;
 - 2. 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;
 - 3. Clear deadlines and manner in which an appeal must be requested;
 - 4. Prompt written notice of the final decision on the appeal.
- C. **Ability to provide further assistance.** Termination will not bar the provider from later providing additional assistance to the same family or individual.

4G. 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.

4H. Environmental Review

Federally funded projects are subject to an environmental review process.. IHFA 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 ESG or CoC may be subject to full or partial environmental review as applicable. IHFA will define the level of review required and complete and document all environmental requirements. The environmental review process must be complete before the project is approved and funded, or in cases of leasing or rental assistance, prior to securing a lease.

4I. 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(6), 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.

SECTION 3: PROGRAM MONITORING

Multiple forms of monitoring exist: project, performance, and HMIS/CMIS. Project compliance will be carried out by the Collaborative Applicant. Performance compliance will be enforced by CoC committees and the Collaborative Applicant. HMIS/CMIS compliance will be conducted and enforced by the HMIS Lead Agency.

In executing project compliance, the Collaborative Applicant 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 the U.S. Department of Housing and Urban Development (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 carried out by the Strategic Planning Committee, with support from the HMIS Lead Agency and Data Collection, Reporting, and Evaluation Committee. 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 CoC Board. Additional detail regarding this process is included in Section 4: 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 agencies will be monitored at least annually. All agencies required to participate in HMIS or CMIS through CoC or ESG awards may experience delays in reimbursement payments from the Collaborative Applicant for failure to comply with HMIS or CMIS collection and reporting standards until such time that the agency is in compliance.

1. TYPES OF MONITORING

1A. Project Compliance

In the last quarter of the calendar year, the Collaborative Applicant performs risk assessments on all agencies receiving HUD homelessness assistance funds through IHFA. The risk assessment determines the type of monitoring each project will experience. Each agency will receive one of the following types of monitors:

- A. On-Site Monitor: for new projects, projects who have not received an on-site monitor in the past three years, and projects assessed as high risk.
- B. Remote Monitor: projects assessed as moderate risk
- C. Desk Monitor: projects assessed as low risk

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

- A. 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.
 - a. The Collaborative Applicant will bring the concern to the attention of the subrecipient via formal letter sent certified mail and by email which will recommend actions to address concerns and/or offer technical assistance.
 - b. Concerns do not require a formal written response to the Collaborative Applicant.
- B. 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.
 - a. The Collaborative Applicant will provide documentation via formal letter sent by email. The notification will detail required action to be taken by the subrecipient.
- C. 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:
 - a. Submit the appeal on agency letterhead, addressed to the Collaborative Applicant.
 - b. Present a high level of detail and explanation and must include corresponding documentation addressing the corrective action that was found to be deficient.
 - c. The Collaborative Applicant will consult with the IHCC Board prior to taking de-obligation actions.

1B. 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 agencies participating in HMIS/CMIS in Idaho. Initial monitoring notices are sent to agencies in the first quarter of each calendar year. The audit follows the HMIS Lead Agency's Monitoring Process and Procedures document.

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 for 7 years after the expiration date of the grant under which the program participant was served.

Minimum standards shall ensure sufficient written records are established and maintained to enable the Collaborative Applicant and HUD to determine whether ESG/CoC requirements are being met and comply with §576.500 and 578.103, including the following:

- I. CoC records shall include the following documentation related to establishing and operating the Continuum of Care:
 - a. Evidence that the Board selected meets the requirements of 578.5(b)
 - b. Evidence that the CoC has been established and operated as set forth in subpart B of 24 CFR part 578 including published agendas and meeting minutes, an 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 a single HMIS for the CoC, and monitoring reports of recipients and subrecipients
 - c. Evidence that the CoC has prepared the HUD application for funds in accordance with 578.9

- II. Project participant written records shall include:
 - a. 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
 - b. For CoC-funded projects, acceptable evidence of homeless status as set forth in 24 CFR 578.3, and for ESG-funded projects as in 576.500(b)
 - c. Determination and verification/certification that the project participant was eligible or ineligible for the particular services and/or financial assistance
 - d. Determination and verification/certification that the project participant lacked sufficient resources and support networks to provide the assistance
 - e. 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
 - f. 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
 - g. Identification of the specific services and financial assistance amounts that were provided to the project participant
 - h. When applicable, verification that the services were terminated in compliance with 576.402 or 578.91
 - i. When adopted by the Continuum of Care, a copy of the CoC-approved centralized or coordinated assessment of the project participant
 - j. 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
 - k. Determination and verification that the housing unit met HUD's habitability and lead-based paint standards
 - l. Copy of an individualized housing stability plan
 - m. Notes verifying case management services were provided at least monthly, unless exempt from this requirement

- n. 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
 - o. Notes verifying the project participant was assisted to obtain necessary mainstream and other resources
- III. 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.
- IV. Compliance with HUD’s ESG (24 CFR 576 and 578) requirements for:
- a. Shelter and housing standards
 - b. Conflict of interest
 - c. Homeless participation
 - d. Faith-based activity
 - e. Nondiscrimination, equal opportunity, and affirmative outreach
 - f. Uniform administrative rules (2 CFR 200)
 - g. Environmental review
 - h. Lobbying and disclosure (2 CFR 200)
 - i. Displacement, relocation and acquisition
 - j. Procurement (2 CFR 200)
 - k. Project participant records are kept secure and confidential
 - l. Participation in HMIS or CMIS
- V. Financial records shall include:
- a. Supporting documentation for all costs charged to ESG or CoC grant.
 - b. Documentation showing ESG or CoC funds were spent on allowable costs in accordance with the requirements for eligible activities and cost principles
 - c. Documentation of the receipt and use of program income
 - d. Documentation of the receipt and use of matching funds
 - e. Copies of procurement contracts
- VI. Subrecipients will submit participant records to the Collaborative Applicant at the end of the grant if the grant is not renewed or the subrecipient terminates the grant.

3. REPORTING

3A. HMIS or CMIS

All subrecipients of funding under the ESG and CoC programs are required to use an HMIS or CMIS to record participant-level data on all persons served and all activities assisted under the ESG and CoC programs in accordance with HUD’s standards for an HMIS.

The IHCC has designated Idaho Housing and Finance Association (IHFA) 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 IHCC’s Operating Guidelines include further detail 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. 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 or CMIS 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.”

Victim service providers shall actively utilize CMIS, 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 state:

- 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 in notice.
- The comparable database must meet the standards for security, data quality, and privacy of the HMIS within the Continuum of Care. The comparable database may use more stringent standards than the Continuum of Care’s HMIS.
- Victim service providers and legal service providers may suppress aggregate data on specific participant characteristics if the characteristics meet the requirements of this part and any conditions as may be established by HUD in notice.

3B. APR

Subrecipients must submit at least annual performance reports to IHFA. The project must maintain documentation on all households seeking assistance. If persons seeking services are determined ineligible, documentation must reflect the reasons for determination, and must be maintained by the subrecipient.

3C. Quarterly Data Quality Reporting

The HMIS Lead Agency will, on a quarterly basis or other frequency determined by the CoC, produce HMIS and CMIS reports to the IHCC and the Data, Collection, Reporting, and Evaluation Committee for review and approval. Should the IHCC 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. As for reports currently generated, the DCR&E Committee will use the results to promote improved data completeness and quality among HMIS- and CMIS-participating agencies.

4. CONFIDENTIALITY (24 CFR Part 578.103(b))

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

5. ACCESS TO RECORDS (24 CFR Part 578.103(d))

All records are subject to federal and public rights as outlined in this rule. Notwithstanding the 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 the CoC Program grant audits, examinations, excerpts, and transcripts.

6. GRANT AND PROJECT CHANGES

The recipient and subrecipients may not make any significant changes to a project without prior approval by the IHCC. Once the IHCC has approved the change, HUD will be provided the minutes of the IHCC meeting that document the approval. If the approval is obtained via email from the IHCC board, HUD will be notified of such approval via correspondence from the Homelessness Programs Manager. The change will then be formalized in a grant amendment signed by HUD and the recipient. Any minor changes to an approved grant must be fully documented in the recipient and subrecipient records.

SECTION 4: SYSTEMWIDE PERFORMANCE

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:

1. Length of time persons remain homeless;
2. Exits to Permanent Housing with Returns to Homelessness;
3. Number of persons experiencing homelessness;
4. Employment and Income Growth for CoC-funded Projects;
5. Number of Persons Experiencing First-Time Homelessness;
6. 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
7. 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 element of being able to accurately report on and assess the progress of these measures. Data quality standards are detailed in Appendix B of the HMIS Governance Agreement.

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.

Data Collection, Reporting, and Evaluation Committee (DCR&E): 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 DCR&E 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.

Strategic Planning: The primary role of the Strategic Planning 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, and that 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 the IHCC Board for

adoption. System-wide targets for each measure will be reviewed, and adjusted if necessary, on an annual basis.

Although the System Performance Measures will only provide substantive information when reported and evaluated at a system level, when appropriate and beneficial, reports may be evaluated at a regional level. A working group within the Strategic Planning Committee titled Quality Improvement Intervention (QII) will work with the Regional Coalitions in articulating a complete, objective, and valid assessment of factors influencing system outcomes. This work produced by the QII and Coalitions will aid Strategic Planning in developing statewide strategies to improve performance measure outcomes. The proposed strategies must be reviewed and approved by the Board prior to adoption and implementation. The QII working group may be staffed by Strategic Planning members, DCR&E members, Regional Coalition representatives, providers directly impacted by the work performed, Collaborative Applicant staff, and other interested parties.

Regional Coalitions: These regional advisory groups will share system performance measure reports, along with Strategic Planning Committee inquiries or requests, with the general membership of the Coalition. Regional Coalitions will respond to the requests from Strategic Planning 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.

Governance: The Governance Committee will ensure that communication and education on the system performance measures are taking place at the Regional Coalitions. This includes enforcement of the development of plans to improve system performance by implementing local or system-wide strategies at a regional level. 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.

3. STRATEGY

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 first 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.

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

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.

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.

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 First, 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.

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 families with children and youth defined as homeless under other federal laws.

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 First 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.

4. GOVERNANCE

The Collaborative Applicant, on behalf of the CoC, 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 DCR&E and Strategic Planning Committees and the IHCC. 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 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. 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 local CoC are met. In order to be consistent with 402(f) and 413(b) of the McKinney-Vento Act, ESG recipients must also consult with local CoC’s in developing performance standards and evaluating outcomes of ESG-assisted projects; and CoC’s must in turn analyze patterns of use of ESG funds and help evaluate outcomes for ESG-funded projects.

The IHCC Board has created goals to help the Continuum and CoC and ESG subrecipients meet certain objectives of HUD and the IHCC. A project review process will be used to evaluate subrecipient performance of both federal and IHCC 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 consolidated funding application, for ESG, the Consolidated Annual Performance Report (CAPER).

The CoC Application Score Card will be completed for each McKinney-Vento project funded within the CoC. 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 Collaborative Applicant, on behalf of the Continuum, participates in the ESG program's annual action plan, which includes the ESG funding allocation methodology. For information regarding ESG scoring allocation, consult the State Recipient, Idaho Housing and Finance Association or the Consolidated Plan. The ESG Recipient will provide status reports to the IHCC Board at least annually.

5A. CoC Review & 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 CoC must determine the manner in which projects will be scored and the order in which they will be ranked for the CoC application. The Collaborative Applicant 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 Collaborative Applicant, to include:

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

5B. 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

5C. 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. Projects below this threshold will be labeled Projects of Concern. Grants completing their first project renewal will not be ranked below the threshold line. Projects of Concern, along with all new projects proposed through reallocation of the availability of a bonus project, will be evaluated by a Review Committee established by the IHCC Board. This

includes projects which straddle the threshold line (i.e., fall partially into both Tier 1 and Tier 2). The Review Committee will have access to all applications and will receive a recommendation on project ranking from the Collaborative Applicant based on risk of funding loss for the CoC, quality of application, performance, history of compliance, and community resource needs.

Upon the final decision of the Review Committee, who will be given authority by the IHCC Board to make the ranking and funding decisions, the final Idaho Balance of State CoC project ranking will be complete. Projects of Concern that are included in the CoC'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 of concern may be required to provide quarterly progress reports to the IHCC Board. The IHCC Board 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 Board expectations the project will likely be at risk for mandatory reallocation or project repurposing.

Project repurposing will occur through recommendation by the Collaborative Applicant. Project repurposing 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. Repurposing would mean working with the project and the local HUD office to reclassify the project from one project model to another. For example, a transitional housing project could be converted, or repurposed, to become an emergency shelter project, a permanent housing project, or a rapid rehousing project. The Collaborative Applicant would work closely with the project staff and the local HUD office on the repurposing plan and the timeline for completion of the project repurposing. Project repurposing would be contingent upon HUD approval.

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

5D. 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 proposals will be scored and ranked based on the following criteria:

- Demonstrated ability to comply with HUD, Collaborative Application, and IHCC 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 or performance)
- Proposed activities meet a homelessness/housing need identified as an IHCC priority
- Capable and willing to participate in HMIS/CMIS, including adherence to HUD, HMIS Lead,

- and IHCC standards, and comply with Homeless Connect requirements
- Willingness to operate the project using Housing First practice and philosophy as described in this document

6. APPLICATION PROCESS

Upon HUD issuance of the CoC Program Notice of Funding Availability, or the Program Registration if sufficient information is detailed therein, the Collaborative Applicant will establish a timeline for the completion of the CoC's general and project applications. At a minimum, this timeline will be based on the inclusion and completion of the following activities:

6A. Application

Establish competitive applications (new and renewal) either through the creation of a new version or the revision of a previously used version based on HUD preferences presented in the 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.

6B. Solicitation

The applications should be accompanied by clear instructions, deadlines, and expectations. Renewal applications will be distributed no later than May 1, unless HUD process dictates a need to delay. New projects will include relevant program and component type descriptions for each eligible project type identified. The new project application will be released once availability of funds, eligible project types, and target populations have been identified from the CoC Program Notice of Funding Availability and/or Registration. The solicitations will be posted to both the Collaborative Applicant's and IHCC's websites. The notification of the availability of new or reallocated funds will be broadcast through various stakeholder email channels and are to be announced at each Regional Coalition meeting.

6C. Review Panel

Participation in the Independent Review Panel (IRP) will be requested through Regional Coalitions, email distribution, and the IHCC's and Collaborative Applicant's websites. IRP panelists will assist in the review and scoring of renewal and new project applications. Should the number of volunteers be deficient, Collaborative Applicant staff will assist in the review and scoring of applications. 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.

6D. Application Briefing

The Collaborative Applicant will conduct a briefing that will provide an overview of HUD and IHCC 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.

6E. Project Priority Listing

The project priority listing will consist of the IHCC's ranking of new and renewal CoC projects. This ranking will be based on application score, threshold standards, project component type, and an assessment by the IHCC. All renewal projects will be listed in score order (highest to lowest), in the manner chosen by the IHCC. A threshold line will be drawn. The threshold line will be consistent with the manner by which HUD defines Tier II. Project proposals that do not meet threshold criteria identified in the application will fall below the listing's threshold line. First year renewal projects will be listed immediately above the listing's threshold line. Any renewal project listed below threshold is considered a "Project of Concern." Projects of Concern, along with new applications, are referred to the Board for funding consideration. The referral will include a funding recommendation from the Collaborative Applicant. The Board will establish a review committee to evaluate the proposals and recommendations and 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 grants, they will be ranked at the top of the CoC's Priority Listing, regardless of their new or renewal status.

6F. 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 NOFA.

SECTION 5: COORDINATED ENTRY

1. PURPOSE

The IHCC's coordinated entry system is known as Homeless Connect (HC). The goal of HC is, in collaboration with the Collaborative Applicant, the HMIS Lead Agency, and the Boise City/Ada County Continuum of Care (including BC/AC COC's Coordinated Entry System), to prevent and end homelessness within the CoC's geographic area. HC was developed in accordance with HUD rules, which defines 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 Section 578.3). It is the responsibility of each CoC to implement coordinated entry in their geographic area.

Homeless Connect creates a front door to Idaho's many providers working to end homelessness for single adults, youth, and families. The system encompasses four participant-centered components: 1) Access: ensure that all people experiencing a housing crisis have fair and equal access; 2) Assess: providers quickly identify and assess persons seeking assistance using a standardized, communitywide tool; 3) Assign: those with the most severe service needs are prioritized, while all are connected to housing and homelessness assistance based on their strengths and needs as quickly as possible; and 4) Accountability: all providers support and align with common goals and a shared framework.

The IHCC uses consistent and uniform assessment and referral processes to determine and secure the most appropriate response to each individual or family's immediate and long-term housing and service needs.

2. GOALS AND GUIDING PRINCIPLES

The establishment and continued governance of a uniform and collaborative system must be founded upon consistent and universal goals and principles. The Continuum has adopted goals and guiding principles to focus the efforts and activities of Homeless Connect.

2A. Goals of Homeless Connect

- Provide ease of access to community resources to those in need.
- “Right-size” resource allocations to reflect the needs of persons experiencing homelessness and those at risk of homelessness.
- Increase system uniformity while remaining considerate of community and regional needs.
- Align all federal programs and other services for persons experiencing homelessness to maximize resources and meet Opening Doors strategic goals.
- Reduce first-time homelessness, length of time homeless, and returns to homelessness by providing the most needed and appropriate services to each community and individual seeking assistance.

2B. Guiding Principles of Homeless Connect

- Transparency: Process is visible and community driven. Everyone is accountable and responsible to the system; the system is accountable to those it serves.
- Evidence-based & Data-driven: Decisions are based on data, evidence, accountability, and assessment, and used to determine the type and extent of needs of the individual.
- Trauma-informed & Participant-centered: HC processes are dignified, empathetic, responsive, and support self-determination, with a focus on offering services that fit specific needs.
- Promote Equitable Allocation of Resources: Allocation of resources is strategy-oriented, intentional, and determined by performance outcomes.
- Streamlined Processes: System is as easy to navigate as possible.
- Low-barrier, Housing First Approach: To the extent possible, housing placements are based on need, not on program eligibility. Housing placement is offered as quickly as possible.
- Ongoing Evaluation of Resources & Data: Ensure that data quality and resource allocation for the system are functional and meet state-led performance measures.
- Prioritization: Those with the longest history of homelessness and of the greatest need receive housing resources first.

3. SYSTEM PARTICIPATION

All homelessness assistance providers receiving HUD funding must participate in Homeless Connect. The level of participation may vary by agency and project type. The policies and procedures for HC that each required participant must follow are detailed in the CoC's Homeless Connect Operating Procedures.

APPENDIX

A. GLOSSARY OF TERMS

B. HUD DEFINITION OF HOMELESSNESS

C. DEFINITION OF CHRONIC HOMELESSNESS

D. ACRONYMS

***E. CROSSWALK OF HUD HOMELESSNESS AND AT-RISK DEFINITIONS AND ELIGIBILITY
TO ESG PROGRAM COMPONENTS***

F. ESG LINE ITEM DETAIL

G. CoC LINE ITEM DETAIL

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 if 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.

Chronically Homeless - A person is chronically homeless if they have been homeless for at least one year continuously or has experienced four episodes over the last three years which cumulatively total at least 12 months. For this definition, the persons must have been homeless in a place not meant for human habitation, in an emergency shelter, or in a safe haven. In addition, persons must be diagnosed with one or more of the following conditions: Substance abuse disorder, serious mental illness, developmental disability, post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability.

CoC/Continuum of Care – A group composed of representatives of relevant organizations, which generally includes nonprofit homeless providers; victim 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.

ESG – Emergency Solutions Grant Program (24 CFR part 576)

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).

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.

Fair Market Rent – Means the rents published in the Federal Register annually by HUD

Families – Family includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, the followings: (1) A single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person; or (2) A group of persons residing together, and such group includes, but is not limited to (a) A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family); (b) An elderly family; (c) A near-elderly family; (d) A disabled family; (e) A displaced family; and (f) The remaining member of a tenant family.

HMIS – Homelessness Management Information System means the information system designated by the Continuum of Care to comply with the HMIS requirements prescribed by HUD.

HMIS Lead Agency – The entity designated by the Continuum of Care to operate the HMIS on its behalf.

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 most common definition being an individual or family who lacks a fixed, regular, and adequate nighttime residence under Category 1.

Homelessness Prevention – A program targeted to individuals and families at risk of homelessness. Specifically, this includes those that meet the criteria under the “at risk of homelessness” definition at 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.

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.

Permanent Housing – Community-based housing without a designated length of stay, and includes both Permanent Supportive Housing and Rapid Rehousing.

Permanent Supportive Housing – Permanent housing in which supportive services are provided to assist homeless persons with a disability to live independently.

Physical, Mental or Emotional Impairment – Expected to be long-continuing or of indefinite duration; substantially impedes the person’s ability to live independently, and could be improved by more suitable housing.

Rapid Rehousing – 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 arrear for up to six months, to eligible persons who qualify as homeless under Category 1 and 4 of the “homeless” definition.

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

Rent Reasonableness – A process conducted by the recipient or sub-recipient to determine if the rent charge for the unit receiving rental assistance is reasonable in relation to rents being charged for comparable unassisted units, 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 charge by for comparable unassisted units.

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

Sub-recipient – 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.

Transitional Housing – Facilitates the movement of homeless individuals and families to permanent housing within 24 months

Unsheltered Homeless – Individuals and families who qualify as homeless under Category 1(i) of the “homeless” definition.

Victim Service Provider – A private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, battered women’s shelters, domestic violence transitional housing programs, and other programs.

APPENDIX B: HUD CRITERIA FOR DEFINING HOMELESS

HUD CRITERIA FOR DEFINING HOMELESS

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 not meant for human habitation immediately before entering that institution

Category 2

Imminent Risk of Homelessness

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 3

Homeless under other Federal statutes

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 the other listed federal statutes;
- Have not had a lease, ownership interest, or occupancy agreement 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

- Can be expected to continue in such status for an extended period of time due to special needs or barriers

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

APPENDIX C: DEFINITION OF CHRONIC HOMELESSNESS

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

- An individual who:
 - Is homeless and lives in a place not meant for human habitation a safe haven, or in an emergency shelter; and
 - Has been homeless and living or residing in a place not meant human habitation, a safe haven, or in an emergency shelter continuously for at least one year or at least four separate occasions in the last 3 years; and
 - Can be diagnosed with one more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments, resulting from brain injury, or chronic physical illness or disability.
- 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 and met all of the criteria in paragraph (1) of this definition [as described in Section I.D.2 (a) of this notice] before entering the facility; or
- 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 in paragraph (1) of this definition [as described in Section I.D.2 (a) of this notice] including a family whose composition has fluctuated while the head of household has been homeless.

For all non-dedicated/Prioritized PSH units, participants must meet the homeless definition and have a long-term disability.

APPENDIX D: ACRONYM LIST

APR	Annual Performance Report
CES	Coordinated Entry System
COC	Continuum of Care
DV Shelters	Domestic Violence Shelters
eSNAPS	Electronic Special Needs Assistance Programs
ESG	Emergency Solutions Grant
FHA	Fair Housing Act
HC	Homeless Connect
HEARTH	Homeless Emergency and Rapid Transition to Housing
HMIS	Homeless Management Information System
HOME	Home Investment Partnerships (CPD program)
HOPWA	Housing Opportunities for People with HIV or Aids
HUD	US Department of Housing and Urban Development
IDHW	Idaho Health and Welfare
IDOC	Idaho Department of Commerce
IDOC	Idaho Department of Corrections
IFHC	Intermountain Fair Housing Council
IHCC	Idaho Homeless Coordinating Committee
IHFA	Idaho Housing and Finance Association
IRP	Independent Review Panel
IRP	Idaho Rural Partnership
NOFA	Notice of Funding Availability
PIT	Point in Time

PHA	Public Housing Agency
PIH	Public and Indian Housing Department of HUD (Section 8 programs)
PSH	Permanent Supportive Housing
ROI	Release of Information
SNAP	Special Needs Assistance Programs
SS	Supportive Services
SSVF	Supportive Services for Veteran Families
SRO	Single Room Occupancy
TANF	Temporary Assistance for Needy Families
TH	Transitional Housing

APPENDIX E: CROSSWALK OF HUD HOMELESS AND AT RISK DEFINITIONS AND ELIGIBILITY TO ESG PROGRAM COMPONENTS

Eligibility by Component:

Emergency Shelter

Individuals and families defined as Homeless under the following categories are eligible for assistance in ES projects:

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

Rapid Rehousing

Individuals and families defined as Homeless under the following categories are eligible for assistance in RRH projects:

- Category 1: Literally Homeless
- Category 4: Fleeing/Attempting to Flee DV (if the individual or family is also literally homeless)

Homelessness Prevention

Individuals and families defined as Homeless under the following categories are eligible for assistance in HP projects:

- Category 2: Imminent Risk of Homeless
- Category 4: Fleeing/Attempting to Flee DV (if the individual or family is NOT also literally homeless)

Individuals and families who are defined as At Risk of Homelessness

Additionally, HP projects must only serve individuals and families that have an annual income BELOW 30% AMI

APPENDIX F: ESG LINE ITEM DETAIL

ESG Program Description of Eligible Costs 24 CFR 576	
Eligible Costs From the HEARTH regulations:	
Emergency Shelter	
Services 24 CFR 576.102	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 victims 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.

	<p>Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.</p> <p>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.</p>
Outpatient Health Services	<p>Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals.</p> <p>Funds may be used only for these services to the extent that other appropriate health services are unavailable within the community.</p> <p>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.</p>
Life Skills	<p>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.</p>
Mental Health Services	<p>Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions.</p> <p>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.</p> <p>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.</p> <p>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.</p>
Substance Abuse Treatment Services	<p>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.</p> <p>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.</p>

	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.
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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, victim 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 24 CFR 576.103	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 24 CFR 576.105	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 24 CFR 576.105	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.

	<p>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.</p>
<p>Short Term and Medium Term Tenant-Based Rental Assistance(Rent) 24 CFR 576.106</p>	<p>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.</p>
<p>Rapid Rehousing 24 CFR 576.104</p>	<p>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.</p>
<p>Housing Relocation and Stabilization Financial 24 CFR 576.105</p>	<p>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).</p>
<p>Housing Relocation and Stabilization Services 24 CFR 576.105</p>	<p>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.</p> <p>Housing Stability Case Management- ESG funds may be used to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized</p>

	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) 24 CFR 576.106	Subject to general conditions under § 576.103 and §576.104, the receipt 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 24 CFR 576.107	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> 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 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.	

APPENDIX G: CoC LINE ITEM DETAIL

COC Program Description of Eligible Costs 24 CFR 578	
Eligible Costs From the HEARTH regulations:	
Leasing 24 CFR 578.49	refer to Leasing & RA tab
Rental Assistance 24 CFR 578.51	refer to Leasing & RA tab
Supportive Services 24 CFR 578.53	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	<p>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:</p> <ul style="list-style-type: none"> - 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 victims 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). - 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	<p>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:</p> <ul style="list-style-type: none"> - 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	<p>Costs of improving knowledge and basic educational skills, including:</p> <ul style="list-style-type: none"> - 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	<p>Costs of establishing and operating employment assistance and job training programs, including:</p> <ul style="list-style-type: none"> - Classroom, online, and/or computer instruction. - On-the-job instruction. - Services that assist individuals in securing employment, including: <ul style="list-style-type: none"> -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. - The cost of providing reasonable stipends to program participants in employment assistance and job training programs.
Food	<p>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.</p> <ul style="list-style-type: none"> - 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	<p>Costs of helping eligible program participants locate, obtain, and retain suitable housing. Component services or costs include:</p> <ul style="list-style-type: none"> - 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.
	- 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:

	<p>- 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:</p> <p>-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).</p> <p>-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.</p> <p>-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.</p> <p>-Gas vouchers are no longer eligible to be reimbursed; i.e.: this includes gas cards, filling up gas tanks, etc.</p>
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 24 CFR 578.55 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 24 CFR 578.57 - 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.
	General management, oversight, coordination, monitoring and evaluation.

Administrative Costs 24 CFR 578.59	Salaries, wages and related costs of the recipient's staff, the staff of subrecipients, or other staff engaged in program administration.
	Reports for sub-recipient to send to IHFA 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.	

ADDENDUM: EMERGENCY RESPONSE TO COVID-19 PANDEMIC

1. PURPOSE

In order to effectively plan, prepare for and respond to COVID-19 pandemic, HUD issued pandemic-related program waivers for the Continuum of Care (CoC), Emergency Solutions Grants (ESG) and Housing Opportunities for Persons with Aids (HOPWA) programs.

1A. Waivers

IHFA notified HUD of its intent to make available the following programmatic waivers from the CPD Memorandum released on March 31, 2020:

- CoC Program - Fair Market Rent for Individual Units and Leasing Costs – Valid until 9/30/2020
- CoC Program - Disability Documentation for Permanent Supportive Housing (PSH) – Valid until 9/30/2020
- CoC Program – Limit on Eligible Housing Search and Counseling Services – Valid until 3/31/2021
- CoC Program - Permanent Housing-Rapid Re-housing Monthly Case Management Valid until 5/31/2020
- CoC Program - Housing Quality Standards (HQS) – Initial Physical Inspection of Unit - Valid until 9/30/2020
- CoC Program - HQS – Re-Inspection of Units – Valid until 3/31/2021
- CoC Program – One-Year Lease Requirement – Valid until 9/30/2020
- ESG Program - HMIS Lead Activities – Valid until 9/30/2020
- ESG Program - Re-evaluations for Homelessness Prevention Assistance – Valid until 3/31/2022
- ESG Program - Housing Stability Case Management – Valid until 5/31/2020
- ESG Program - Restriction of Rental Assistance to Units with Rent at or Below FMR – Valid until 9/30/2020
- HOPWA Program – Self-Certification of Income and Credible Information on HIV Status – Indefinite expiration date
- HOPWA Program – FMR Rent Standard – Valid until 3/31/2021
- HOPWA Program – Property Standards for TBRA – Valid until 3/31/2021
- HOPWA Program - Space and Security – Indefinite expiration date

IHFA notified HUD of its intent to make available the following programmatic waivers from the CPD Memorandum released on May 22, 2020:

- CoC Program – Permanent Housing Rapid Re-housing Limit Indefinite expiration date
- ESG and ESG-CV Program - Housing Stability Case Management Extended until 8/22/2020
- CoC Program - Assistance Available at Time of Renewal – Valid until 3/31/2021
- CoC Program – Permanent Housing-Rapid Re-housing Monthly Case Management – Extended until 8/22/2020
- HOPWA Program – Time Limits for Short Term Housing Facilities and Short Term Rent – Valid until 5/21/2021
- HOPWA Program – Property Standards – Extended until 5/21/2021
- HOPWA Program – FMR Rent Standard – Extended until 5/21/2021

IHFA notified HUD of its intent to make available the following programmatic waivers from the CPD Memorandum released on September 30, 2020:

- COC Program – Fair Market Rents for Individual Units and Leasing Costs – Extended until 12/31/2020
- COC Program – Housing Quality Standards – Initial Physical Inspection of Unit – Extended until 12/31/2020
- COC Program – Third-Party Documentation of Income – Valid until 12/31/2020
- COC Program – Coordinated Entry – Annual Ongoing Planning and Stakeholder Consultation – Valid until 9/30/2021
- COC Program – Temporary Stays in Institutions of 90 days or Less Valid until 3/31/2021

- COC Program – Permanent Housing-Rapid Rehousing Monthly Case Management – Extended until 12/31/2020
- COC Program – Disability Documentation for Permanent Supportive Housing – Extended until public health officials determine no additional special measures are necessary to prevent the spread of COVID-19.
- COC Program – One Year Lease Requirement - – Extended until 12/31/2020
- COC Program – Suitable Dwelling Size and Housing Quality Standards - Valid until the end of the initial lease term or 12/31/2020, whichever is later.
- ESG Program – Temporary Stays in Institutions of 90 days or Less – Valid until 3/31/2021

IHFA notified HUD of its intent to make available the following programmatic waivers from the CPD Memorandum released on December 29, 2020:

- COC Program – Third-Party Documentation of Income – Valid until 3/31/2021
- COC Program – Housing Quality Standards – Initial Inspection of Unit – Extended until 3/31/2021
- COC Program – Suitable Dwelling Size and Housing Quality Standards - – Extended until the end of the initial lease term or 3/31/2021, whichever is later.
- COC Program – Permanent Housing – Rapid Re-Housing Monthly Case Management – Extended until 3/31/2021
- COC Program – Fair Market Rent for Individual Units and Leasing Costs – Extended until 3/31/2021
- COC Program – One-Year Lease Requirements – Extended until 3/31/2021

IHFA notified HUD of its intent to make available the following programmatic waivers from the CPD Memorandum released on March 31, 2021:

- COC Program – Third-Party Documentation of Income – Valid until 6/30/2021
- COC Program – Housing Quality Standards – Initial Inspection of Unit – Extended until 6/30/2021
- COC Program – Suitable Dwelling Size and Housing Quality Standards - – Extended until the end of the initial lease term or 6/30/2021, whichever is later.
- CoC Program - Assistance Available at Time of Renewal – Valid until 6/30/2021
- COC Program – Permanent Housing – Rapid Re-Housing Monthly Case Management – Extended until 6/30/2021
- COC Program – Fair Market Rent for Individual Units and Leasing Costs – Extended until 6/30/2021
- COC Program – One-Year Lease Requirements – Extended until 6/30/2021
- CoC Program – Limit on Eligible Housing Search and Counseling Services – Valid until 6/30/2021
- CoC Program - HQS – Re-Inspection of Units – Valid until 6/30/2021
- COC Program – Temporary Stays in Institutions of 90 days or Less – Valid until 6/30/2021
- ESG Program – Temporary Stays in Institutions of 90 days or Less – Valid until 6/30/2021
- HOPWA Program – Time Limits for Short Term Housing Facilities and Short Term Rent – Valid until 6/30/2021
- HOPWA Program – Property Standards – Extended until 6/30/2021
- HOPWA Program – FMR Rent Standard – Extended until 6/30/2021

DOCUMENTATION PROCESS:

All documentation for waivers being utilized by subrecipients will be submitted with draw requests and subsequently tracked in individual budgets, as well as the draw documentation.

2. ESG-CV Guidelines

Funding under ESG-CV will follow the same programmatic guidelines as regular ESG funding. These additional funds for the Emergency Solution Program (ESG), in combination with additional authority to waive ESG requirements, will enable the CoC to prevent, prepare for, and respond to coronavirus, among individuals and families who are homeless or receiving homeless assistance and to support additional homeless assistance and homelessness prevention activities to mitigate the impacts created by coronavirus.

Coordinate with public health partners to establish COVID-19 specific procedures where appropriate.

If shelters utilize symptom screening as a part of intake procedures, it should be reviewed and approved by a local public health partner such as the county's or state's department of public health or the Healthcare for the Homeless partner.

Shelters funded by ESG-CV should establish referral pathways to isolation and quarantine if a client is in need of such services.

Shelters funded through ESG-CV should maintain social distancing requirements established in partnership with the county's or state's department of public health.

Expanded Definition of ESG-CV Eligible Shelter Funds.

ESG-CV allows for a variety of spaces to be used as temporary shelters. This space may be within an existing shelter or a separate building, such as public spaces and pop-up or modular structures (in compliance with [U.S. Department of Housing and Urban Development \(HUD\) guidance](#)).

Standard policies and procedures for evaluating individual and family eligibility for assistance under ESG.

The Coordinated Entry Systems (CES) may be modified to expedite the assessment, scoring, and eligibility determinations to prioritize those at high risk for severe illness from COVID-19 for shelter and housing. Coordinated Entry modifications will be consistent with fair housing and nondiscrimination requirements.

Policies and procedures to ensure that shelters maintain operations and remain accessible to people experiencing homelessness who are particularly vulnerable to adverse health outcomes related to COVID-19 infection.

Shelters funded by ESG-CV should not turn away eligible program participants and should establish referral pathways to other shelter or housing if the shelter is at maximum capacity. Shelters should establish referral pathways to isolation and quarantine if a client is in need of such services.

Someone who presents at an ESG-funded shelter with respiratory symptoms (e.g., cough) should not be turned away solely because of their health symptoms.

Shelters funded by ESG-CV are strongly discouraged from implementing a maximum length of stay when a discharge will result in program participants returning to unsheltered settings or situations putting them at a higher risk of COVID-19 infection.

Any ESG-funded shelter that is considering closing or not accepting new residents should immediately notify the local CoC, public health authority, and emergency management officials.

Policies and procedures for coordination among emergency shelter providers, essential services providers, homelessness prevention, and rapid rehousing (RRH) assistance providers; other homeless assistance providers; and mainstream service and housing providers.

ESG-CV funded shelters and outreach programs should encourage (but may not require) people experiencing homelessness to get tested if they are experiencing COVID-19 symptoms. Shelters in the jurisdiction are encouraged to use funds provided through ESG-CV to purchase technology to access telehealth services provided through Healthcare for the Homeless.

Standards for determining what percentage or amount of rent and utilities costs each program participant must pay while receiving homelessness prevention or RRH assistance.

Under the Coronavirus Aid, Relief, and Economic Security (CARES) Act ESG-CV funding, there is no rental payment requirement for households receiving financial assistance.

Match

Subrecipients who apply for and are awarded ESG-CV funds will not be required to provide match, as this normal requirement has been waived by HUD specifically for ESG-CV.

Rent Reasonableness

The requirement at 24 CFR 576.106(d) that prohibits rental assistance where the rent for the unit exceeds the Fair Market Rent established by HUD, as provided under 24 CFR Part 888, has been temporarily waived so long as the rent complies with HUD's standards of rent reasonableness.

Subrecipients must determine and document rent reasonableness by considering the location, quality, size, type, and age of the unit, and any amenities, maintenance, and utilities to be provided by the owner.

Acceptable forms of documentation include:

- A market study of rents charged for units of different sizes in different locations or a review of advertisements for comparable rental units, including a printout of three comparable units' rents, and evidence that these comparison units shared the same features (location, size, amenities, quality, etc.). **A helpful "Rent Reasonableness Checklist and Certification" form is available at:** <https://files.hudexchange.info/resources/documents/RentReasonableChecklist.pdf>.
- A written verification signed by the property owner or management company, affirming that the rent for a unit assisted with ESG-CV funds is comparable to current rents charged for similar unassisted units managed by the same owner.

Prevent, Prepare for and Respond to Coronavirus

To determine whether ESG-CV funds are eligible to cover certain activities, subrecipients should consider the following:

(i) Prevent Coronavirus

Subrecipients can use ESG-CV funds to cover activities intended to prevent the spread of COVID-19 homeless and at-risk homeless individuals, subrecipient staff, or other shelter or housing residents. Such activities include providing Personal Protective Equipment to staff and clients, paying for hotels and motels, and providing rapid rehousing or homelessness prevention assistance to the above-mentioned individuals to reduce their risk of contracting or further spreading COVID-19.

(ii) Prepare for Coronavirus

Subrecipients can use ESG-CV funds to cover preparatory activities that a subrecipient carried out before or during a COVID-19 outbreak in their jurisdiction to keep people healthy, reduce the risk of exposure and/or reducing spread of the disease. Examples include updating written standards to prioritize high-risk clients, changing coordinated entry policies and policies to account for social distancing measures or increased demand, developing a strategy and recruiting landlords to provide housing to homeless and at-risk homeless individuals, training service providers on infectious disease prevention and mitigation, and implementing a non-congregate shelter strategy to reduce the spread of the virus.

(iii) Respond to Coronavirus

Subrecipients can use ESG-CV funds for activities intended to help clients who have already contracted COVID-19, provider staff, and/or individuals and families who have lost or are at risk of losing their housing. These activities include transport to medical appointments, paying for shelter to isolate individuals who have the disease, providing rental assistance, and/or providing hazard pay to subrecipient staff.

Subrecipients are encouraged to spend down all grant funds before the end of the grant term, as unspent funds are likely to be recaptured by HUD.

Program Components and Eligible Activities

Subrecipients should consider the following information on training, hazard pay and landlord and volunteer incentives to determine whether ESG-CV funds are eligible to cover those expenses.

(i) Training

Subrecipients may use ESG-CV funds to cover training on infectious disease prevention and mitigation for staff workers, so they know how to prevent, prepare for and respond to coronavirus among their client population. ESG-CV funding is not considered an administrative cost for purposes of the 10 percent cap. Limitations on eligible activities detailed in section 415(a) of the McKinney-Vento Homeless Assistance Act and 24 CFR part 576, subpart B, are waived. Recipients that received CARES Act funding are available to use ESG-CV funds for training. Costs of the training are eligible as a standalone activity and should not be charged to an activity under 24 CFR 576.101 to 24 CFR 576.109.

(ii) Hazard Pay

ESG-CV funds may be used to pay hazard pay for subrecipient-staff working directly to prevent, prepare for, and respond to coronavirus among persons who are homeless or at risk of homelessness. Examples of subrecipient staff working directly in support of coronavirus response include emergency shelter intake staff, street outreach teams, emergency shelter maintenance staff, emergency shelter security staff, staff providing essential services (e.g., outpatient health or mental health, housing navigators), and staff in proximity to persons with coronavirus or working in locations with a high likelihood of contracting coronavirus. Hazard pay is capped at 1.5 times an employee's regular wage and the amount of the additional wages must be separately identified when submitting draw forms.

(iii) Landlord Incentives

Limitations on eligible costs listed under section 415(a) of the McKinney-Vento Act and 24 CFR 576.105 are waived. ESG-CV funds can be used to pay for landlord incentives in an amount that exceeds three times the rent charged for the unit. Waiving the limitations on eligible costs and adding landlord incentives will increase the number of housing units available to homeless and at-risk homeless individuals, particularly in tight rental markets. Landlord incentives can include: a) signing bonuses equal to up to two months of rent; b) security deposits equal to up to three months of rent; c) paying the cost to repair damages incurred by the program participant not covered by the security deposit or accrued while the person was still residing in the unit; and d) paying the costs of extra cleaning or maintenance of a program participant's unit or appliances.

(iv) Volunteer Incentives

The limitations on eligible activities provided in section 415(a) of the McKinney-Vento Homeless Assistance Act and 24 CFR part 576, subpart B are waived and alternative requirements are established to the extent necessary to authorize ESG-CV funds to be used under 24 CFR 576.101(a), 24 CFR 576.102(a)(1), and 24 CFR 576.105(b) for cost of providing reasonable incentives to volunteers (e.g., cash or gift cards) who have been and are currently helping to provide necessary street outreach, emergency shelter, essential services, and housing relocation and stabilization services during the coronavirus outbreak. Waiving this requirement to allow the payment of reasonable costs of volunteer incentives will increase the number of people available to provide the needed services and connections to housing to individuals and families experiencing homelessness to prevent the spread of coronavirus. A volunteer incentive cannot exceed the published value of volunteer incentives for Idaho listed at:

https://independentsector.org/resource/vovt_details/. Volunteer incentives are not intended to replace wages for hourly staff.

To the extent feasible, volunteer services must be supported by the same methods that the organization uses to support the allocation of regular personnel costs. Timesheets that capture actual time spent on specific programs are the most straightforward way to meet time reporting requirements. However, other approaches may be acceptable as long as they meet the guidelines established in 2 CFR part 200. In terms of financial records, the recipient and its subrecipients must keep documentation showing that ESG grant funds were spent on allowable costs in accordance with the requirements for eligible activities under § 576.101-§ 576.108 and the cost principles in 2 CFR part 200. (24 CFR 576.500(u)).

(v) Use of Hotels and Motels

While ESG-CV funds may be used to provide hotel or motels stays for program participants consistent with 24 CFR 576.102 and Notice CPD 20-08, providing permanent housing in hotels and motels is an ineligible use of ESG funds (including ESG-CV funds) under section 415(a) of the McKinney-Vento Act and 24 CFR part 576 subpart B.

3. CONTINUUM OF CARE PROGRAM - Waivers

The following waivers were made available by HUD and requested for use by the CoC for the Continuum of Care program grants.

3A. Fair Market Rent for Individual Units and Leasing Costs

The FMR restriction is waived for any lease executed by a recipient or subrecipient to provide transitional or permanent supportive housing and is effective until June 30, 2021. The affected subrecipient must still ensure that rent paid for individual units that are leased with CoC Program leasing dollars meet the rent reasonableness standard.

3B. Disability Documentation for Permanent Supportive Housing (PSH)

The requirement that intake staff-recorded observation of disability be confirmed and accompanied by other evidence no later than 45 days from the application for assistance documentation requirement is waived for any program participants admitted into PSH funded by the CoC Program for the 6-month period beginning on the date of this memorandum.

Note: For the purposes of individuals and families housed in PSH from September 30, 2020 until public health officials determine no additional special measures are necessary to prevent the spread of COVID-19, a written certification by the individual seeking assistance that they have a qualifying disability is considered acceptable documentation approved by HUD.

3C. Limit on Eligible Housing Search and Counseling Services

The limitation on eligible housing search and counseling activities is waived so that CoC Program funds may be used for up to 6 months of a program participant's utility arrears and up to 6 months of program participant's rent arrears, when those arrears make it difficult to obtain housing. This waiver is in effect until June 30, 2021.

3D. Permanent Housing-Rapid Re-housing Monthly Case Management

This requirement in 24 CFR 578.37(a)(1)(ii)(F) that projects require program participants to meet with case managers not less than once per month is waived for all permanent housing- rapid re-housing projects until June 30, 2021. Waiving the monthly case management requirement as specified below will allow recipients to provide case management on an as-needed basis and reduce the possible spread and harm of COVID-19.

3E. Housing Quality Standards (HQS) – Initial Physical Inspection of Unit

This waiver of the requirement that the recipient or subrecipient physically inspect each unit to assure that the unit meets HQS before providing assistance on behalf of a program participant is in effect until June 30, 2021 for subrecipients that are able to meet the following criteria:

- a. The owner certifies that they have no reasonable basis to have knowledge that life-threatening conditions exist in the unit or units in question; and
- b. The subrecipient has written policies to physically inspect the unit within 3 months after the health officials determine special measures to prevent the spread of COVID-19 are no longer necessary.

3F. HQS – Re-Inspection of Units

Waiving the annual re-inspection requirement during this public health crisis as specified below will help allow recipients to prevent the spread of COVID-19. This requirement is waived until June 30, 2021.

3G. One-Year Lease Requirement

The one-year lease requirement is waived for leases executed between March 31, 2020 and June 30, 2021, so long as the initial term of all leases is at least one month.

3H. Permanent Housing Rapid Re-housing Limit to 24 Months of Rental Assistance

The 24-month rental assistance restriction is waived for program participants in a permanent housing rapid re-housing project who will have reached 24 months of rental assistance beginning on the date of the memorandum until a state or local public health official has determined special measures are no longer necessary to prevent the spread of COVID-19. Program participants who have reached 24 months of rental assistance during this time and who will not be able to afford their rent without additional rental assistance will be eligible to receive rental assistance until 3 months after a state or local public health official has determined that special measures are no longer necessary to prevent the spread of COVID-19.

3I. Third-Party Documentation of Income

Waiving the requirement that source documents and third-party documentation be unobtainable in order for recipients or subrecipients to rely on a program participant's own certification of their income will help subrecipients house program participants more quickly and determine the appropriate rent contribution or occupancy charge. Moving people experiencing homelessness more quickly into housing enables social distancing, and helps prevent the spread of COVID-19.

The waiver of the requirement at 24 CFR 578.103(a)(7)(iv) that the recipient or subrecipient may only rely on program participant self-certification of income if the other permitted types of documentation are unobtainable when conducting the initial or subsequent rent or occupancy charge calculations is in effect until June 30, 2021. During this time, 24 CFR 578.103(a)(7)(iv) is waived to the extent necessary to allow subrecipients to document annual income with the written certification by the program participant of the amount of income that the program participant is reasonably expected to receive over the 3-month period following the evaluation, even if source documents and third-party verification, are obtainable.

3J. CoC Program Only: Coordinated Entry – Annual Ongoing Planning and Stakeholder Consultation

Waiving the annual coordinated entry planning and stakeholder consultation process as provided below would allow recipients to focus their limited staff capacity on activities related to preventing the spread of COVID-19 and helping program participants remain housed during the subsequent economic downturn.

24 CFR 578.7(a)(8) is waived to the extent it is necessary to lift the requirement in Section 11.B.15 of the Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System until September 30, 2021.

3K. Homeless Definition – Temporary Stays in Institutions of 90 days or Less

Program participants which reside in institutions for longer periods of time as a result of COVID-19, longer time in jail due to a postponed court dates due to court closings, or courts operating at reduced capacity and longer hospital stays when infected with COVID-19. Allowing someone who was residing in an emergency shelter or place not meant for human habitation prior to entering the institution to maintain their homeless status while residing in an institution for longer than 90 days is necessary to prevent the spread of COVID-19 by expanding housing options for people who were experiencing homelessness and institutionalized for longer than traditionally required due to COVID-19. This waiver is in effect until June 30, 2021.

An individual may qualify as homeless under paragraph (1)(iii) the homeless definition in 24 CFR 578.3 so long as he or she is exiting an institution where they resided for 120 days or less and resided in an emergency shelter or place not meant for human habitation immediately before entering that institution. This waiver is in effect until March 31, 2021.

3L. Disability Documentation for Permanent Supportive Housing (PSH)

The requirement that intake staff-recorded observation of disability be confirmed and accompanied by other evidence no later than 45 days from the application for assistance documentation requirement is waived from October 2, 2020 until public health officials determine no additional special measures are necessary to prevent the spread of COVID-19. Written certification by the individual seeking assistance that they have a qualifying disability

will be acceptable documentation approved by HUD under 24 CFR 578.103(a)(4)(i)(B)(5) until public health officials determine no additional special measures are necessary to prevent the spread of COVID-19

3M. One-Year Lease Requirement

HUD originally waived this requirement for 6-months on March 31, 2020 to help recipients more quickly identify permanent housing for individuals and families experiencing homelessness, which is helpful in preventing the spread of COVID-19. Extending this waiver is necessary because recipients continue to need to help program participants identify housing quickly to help prevent the spread of COVID-19. The one-year lease requirement is waived for leases executed between March 31, 2020 and June 30, 2021, so long as the initial term of all leases is at least one month.

3N. Suitable Dwelling Size and Housing Quality Standards

The requirement that each unit assisted with CoC program funds have at least one bedroom or living/sleeping room for each 2 persons is waived for recipients providing Permanent Housing-Rapid Rehousing assistance for leases and occupancy agreements executed by recipients and subrecipients between September 30, 2020 and June 30, 2021 and extending only until the later of 1) the end of the initial term of the lease or occupancy agreement; or 2) June 30, 2021. As a reminder, recipients are still required to follow State and local occupancy laws.

3O. Assistance Available at time of Renewal

The requirement that the renewal grant amount be based on the budget line items in the final year of the grant being renewed is further waived for all projects that amend their grant agreements to move funds between budget line items in a project in response to the COVID-19 pandemic between the date of this memorandum and June 30, 2021. Measures are no longer necessary to prevent the spread of COVID-19. Recipients may then apply in the next FY CoC Program funding cycle based on the budget line items in the grants before they were amended.

4. EMERGENCY SOLUTIONS GRANTS PROGRAM - Waivers

The following waivers were made available by HUD and requested for use by the CoC for the Emergency Solutions Grants (ESG) program.

4A. HMIS Lead Activities

The condition that the recipient must be the HMIS Lead to pay costs is waived to the extent necessary to allow any recipient to use ESG funds to pay costs of upgrading or enhancing its local HMIS to incorporate data on ESG Program participants and ESG activities related to COVID-19. This waiver is in effect until September 30, 2020.

4B. Re-evaluations for Homelessness Prevention Assistance

The required frequency of re-evaluations for homelessness prevention assistance is waived until 3/31/2022, so long as the recipient or subrecipient conducts the required re-evaluations not less than once every 6 months.

4C. Housing Stability Case Management

Recipients are reporting limited staff capacity as staff members are home for a variety of reasons related to COVID-19 (e.g., quarantining, children home from school, working elsewhere in the community to manage the COVID-19 response). In addition, not all program participants have capacity to meet via phone or internet. Waiving the monthly case management requirement as specified below will allow recipients to provide case management on an as needed basis and reduce the possible spread and harm of COVID-19. This waiver is in effect for 5 months beginning on March 31, 2020.

4D. Restriction of Rental Assistance to Units with Rent at or Below FMR

The FMR restriction is waived for any individual or family receiving Rapid Re-housing or Homelessness Prevention assistance who executes a lease for a unit during the 6-month period beginning on the date of the memorandum. The ESG recipient or subrecipient must still ensure that the units in which ESG assistance is provided to these individuals and families meet the rent reasonableness standard.

4E. Homeless Definition – Temporary Stays in Institutions of 90 days or Less

Program participants which are residing in institutions for longer periods of time as a result of COVID-19, longer time in jail due to a postponed court dates due to court closings, or courts operating at reduced capacity and longer hospital stays when infected with COVID-19. Allowing someone who was residing in an emergency shelter or place not meant for human habitation prior to entering the institution to maintain their homeless status while residing in an institution for longer than 90 days is necessary to prevent the spread of COVID-19 by expanding housing options for people who were experiencing homelessness and institutionalized for longer than traditionally required due to COVID-19. This waiver is in effect until June 30, 2021.

An individual may qualify as homeless under paragraph (1)(iii)the homeless definition in 24 CFR 578.3 so long as he or she is exiting an institution where they resided for 120 days or less and resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

5. HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS (HOPWA) -Waivers

The following waivers were made available by HUD and requested for use by the CoC for the Housing Opportunities for Persons with Aids (HOPWA) program grants.

5A. Self-Certification of Income and Credible Information on HIV Status

This waiver is in effect for recipients who require written certification of the household seeking assistance of their HIV status and income, and agree to obtain source documentation of HIV status and income eligibility within 3 months of public health officials determining no additional special measures are necessary to prevent the spread of COVID-19. Eligibility is restricted to a low-income person who is living with HIV/AIDS and the family of such person.

5B. FMR Rent Standard

This waiver of the FMR rent standard limit permits HOPWA grantees to establish rent standards, by unit size, that are reasonable, and based upon rents being charged for comparable unassisted units in the area, taking into account the location, size, type, quality, amenities, facilities, management and maintenance of each unit. Grantees, however, are required to ensure the reasonableness of rent charged for a unit in accordance with §574.320(a)(3).

This waiver is required to expedite efforts to identify suitable housing units for rent to HOPWA beneficiaries and HOPWA-eligible families that have been affected by COVID-19, and to provide assistance to families that must rent units at rates that exceed the HOPWA grantee's normal rent standard as calculated in accordance with §574.320(a)(2). Such rent standards may be used until June 30, 2021.

5C. Property Standards

This waiver is in effect until June 30, 2021 for recipients and project sponsors that are able to meet the following criteria:

- a. The recipient or project sponsor is able to visually inspect the unit using technology, such as video streaming, to ensure the unit meets HQS before any assistance is provided; and
- b. The recipient or subrecipient has written policies to physically re-inspect the unit after the health officials determine special measures to prevent the spread of COVID-19 are no longer necessary.

5D. Space and Security

This space and security requirement is waived for grantees addressing appropriate quarantine space for affected eligible households during the quarantine period recommended by a local health care professional.

5E. Time Limits for Short-Term Housing Facilities and Short-Term Rent, Mortgage, and Utility Payments

This waiver is required to prevent homelessness or discharge to unstable housing situations for households residing in short-term housing facilities or units assisted with STRMU if permanent housing cannot be achieved within the time limits specified in the regulation.

On an individual household basis, grantees or project sponsors may assist eligible households for a period that exceeds the time limits specified in the regulations. A short-term supported housing facility may provide residence to any individual for a period of up to 120 days in a six-month period. STRMU payments to prevent the homelessness of the tenant or mortgagor of a dwelling may be provided for costs accruing up to 52 weeks in a 52-week period.

This waiver is in effect until June 30, 2021 for grantees and project sponsors that are able to meet the following criteria:

- a. The grantee or project sponsor documents that a good faith effort has been made on an individual household basis to assist the household to achieve permanent housing within the time limits specified in the regulations but that financial needs and/or health and safety concerns have prevented the household from doing so; and
- b. The grantee or project sponsor has written policies and procedures outlining efforts to regularly reassess the needs of assisted households as well as processes for granting extensions based on documented financial needs and/or health and safety concerns.