HOUSE IDAHO COLLABORATIVE

WRITTEN STANDARDS
House Idaho Collaborative
Governing Documents

WRITTEN STANDARDS
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Written Standards

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
1. 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 Housing Idaho Collaborative (HIC). HIC is responsible for coordinating and implementing a crisis response system to meet the needs of populations and subpopulations experiencing homelessness within the geographic area, consisting of Idaho’s regions 1-6. The 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 HIC, 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 HIC; 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 HIC which will assist programs to meet and exceed performance outcomes, equipping the CoC to reach the goal of ending homelessness.

2. 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.

2.1 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 Access Point (Coordinated Entry) 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 HIC-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.

2.2 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 rapid rehousing 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:

2.1.1 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.

2.1.2 Low-barrier admissions policy

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.

2.1.3 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.
2.1.4 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.

2.1.5 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.

2.1.6 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).

### 2.1.7 Applicable in a variety of households

**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 Access Point (Coordinated Entry) 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.
3. Program Eligibility and Requirement

3.1 All Programs

3.1.1 Homeless Definitions: Categories for Defining Homeless

3.1.1.1 Literally Homeless

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

- An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

- An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or

- An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

3.1.1.1.1 Documentation Requirements

- Written observation by the outreach worker; or

- Written referral by another housing or service subrecipient; or

- Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in the shelter;

- For individuals exiting and institution-one of the forms of evidence above and: discharge paperwork or written/oral referral, or written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited institution

3.1.1.2 Imminent Risk of Homelessness

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

- The primary nighttime 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, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing.

3.1.1.2.1 Documentation Requirements

- A court order resulting from an eviction action notifying the individual or family that they must leave; or

- For individual and families leaving a hotel or motel-evidence that they lack the financial resources; or
• A documented and verified oral statement; and Certification that no subsequent residence has been identified; and Self-certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing.

3.1.1.3 **Not Eligible in Idaho-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:


• Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;

• Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.

### 3.1.1.3.1 Documentation Requirements

• Certification by the non-profit or state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute: and

• Certification of not PH in the last 60 days; and

• Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the past 60 days; and

• Documentation of special needs or 2 or more barriers

3.1.1.4 **Fleeing/attempting to flee domestic violence:**

Any individual or family who meets the following criteria:

• Is experiencing trauma or a lack of safety related to, or fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous, traumatic, or life-threatening conditions related to the violence against the individual or a family member in the individual’s or family’s current housing situation, including where the health and safety of children are jeopardized;

• Has no other safe residence; and

• Lacks the resources to obtain other safe permanent housing
3.1.4.1 Documentation Requirements

- For Victim Service Subrecipients
  - An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack the resources. Statement must be documented by a self-certification or a certification by the intake worker.

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

3.1.2 Considerations for Special Populations

3.1.2.1 Veterans

To support the federal goal to end veteran homelessness, veterans will be prioritized through the Access Point (Coordinated Entry) 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.

3.1.2.2 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.

3.1.2.2.1 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.

### 3.1.3 Subrecipient Internal Controls

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

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

The Controller General of the United States has issued standards for internal control in the federal government, which is often referred to as the Green Book. Subrecipients can use the U.S. Government Accountability Office (GAO) standards as a reference in setting up strong internal controls in their entities. For additional guidance please review GAO-14-704G, STANDARDS FOR INTERNAL CONTROL IN THE FEDERAL GOVERNMENT).

### 3.2 Emergency Solutions Grants Program (24 CFR 576)

#### 3.2.1 Street Outreach Component

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

##### 3.2.1.1 Eligible Activities

1. **3.2.1.1.1 Engagement**

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

### 3.2.1.1.2 Case Management

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

### 3.2.1.1.3 Emergency Health Services

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

### 3.2.1.1.4 Emergency Mental Health Services

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

### 3.2.1.1.5 Transportation

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

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

• The travel costs of recipient or subrecipient staff to accompany or assist program participants to use public transportation.

3.2.1.2 Services for Special Populations

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

3.2.1.3 Eligible Participants

Participants must meet one of the following:

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

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

3.2.2 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.

3.2.2.1 Eligible Activities

3.2.2.1.1 Services

• Case Management
• Childcare
• Education Services
• Employment Assistance and Job Training
• Outpatient Health Services
• Life Skills Training
• Mental Health Services
• Substance Abuse Treatment Services
• Transportation
3.2.2.1.2 Operations

- Maintenance
- Rent
- Security
- Fuel
- Equipment
- Insurance
- Utilities
- Food
- Furnishings
- Supplies
- Hotel/Motel Vouchers

C. Data Collection
D. Administrative Costs

3.2.2 Eligible Participants

Participants must meet one of the following:

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

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

3.2.3 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.

3.2.3.1 Eligible Activities

3.2.3.1.1 Financial Assistance

- Rent: current rent owed as shown on lease.
- Rental Arrears: Arrears with fees as listed on lease and eviction notices, up to 6 months.
- Utility Payments (Arrears and Current): Standard utilities required in a participant’s lease (i.e. gas, electric, water/sewage).
• 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).

### 3.2.3.1.2 Services

- **Case Management:** Assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability.

- **Housing Search and Placement:** Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing.

### 3.2.3.1.3 Data Collection Costs

Costs related to contributing participant data to or maintaining data in the CoC’s HMIS or CMIS for domestic violence 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.

### 3.2.3.1.4 Time Limits

- **Financial Assistance:** Participants are only eligible for financial assistance up to 6 months during any 1-year period.

- **Services:** Participants are limited to 9 months of services during any 1-year period.

### 3.2.3.2 Eligible Participants

Participants must meet one of the following:

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

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

In verifying income, ESG-funded 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.

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.

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

### 3.2.4 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.

### 3.2.4.1 Eligible Activities

#### 3.2.4.1.1 Financial Assistance

- **Rent**: Current rent owed as shown on lease.
- **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.
- **Utility Payments (Arrears and Current)**: Standard utilities required in a participant’s lease (i.e. gas, electric, water/sewage)
- **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).**

#### 3.2.4.1.2 Services

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

#### 3.2.4.1.3 HMIS Costs

Costs related to contributing participant data to or maintaining data in the CoC’s HMIS or a comparable database for domestic violence 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.

#### 3.2.4.1.4 Time Limits

- **Financial Assistance**: Participants are only eligible for financial assistance up to 24 months during any 3-year period.
- **Services**: Participants are limited to 30 months of services during any 3-year period.

### 3.2.4.2 Eligible Participants

Participants must meet one of the following:

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

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

3.2.4.2.1 Population-specific requirements

- Homeless persons who are in shelters or living in places not meant for human habitation, meeting the criteria for HUD’s Category 1 definition of homelessness, or persons fleeing or attempting to flee domestic violence, meeting the criteria for HUD’s Category 4 definition of homelessness

- Housing history, education level, and employment history will also be considered when choice of transitional housing and rapid rehousing are both available

- Individuals who have repeated homeless episodes or the current homeless episode is more than 3 months

- Household incomes at or below 50% of area median income (AMI)

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

In verifying income, ESG-funded 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.

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

3.2.4.2.2 Payment Requirements

Prior to payment of rental assistance, the rental unit must pass the necessary inspections (Housing Quality Standards) and have an executed lease. Leases should be for the term of one year, but if extenuating circumstances exist (i.e., market conditions, landlord standards, unit scarcity), leases can be for a term of less than one year if mutually agreed upon by the landlord and 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 full calendar months 1, 2, and 3. If the first month of the lease is partial and prorated, it will not count as month 1. Each month thereafter month 3 assistance will be reassessed. If, based on rent-to-income ratio the participant is not able to pay full rent and utilities in months 4 and later, the participant is eligible to continue receiving rental assistance up to a total of 12 months per enrollment if the participant is adhering to all subrecipient 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.

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

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.

3.2.5 ESG 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.

3.2.5.1 The following are eligible types of match contributions:

3.2.5.1.1 Cash

3.2.5.1.2 In-Kind (noncash contributions)

• The value of any real property, equipment or goods 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.

• The value of 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. Services must be valued at rates consistent with those ordinarily paid for similar work in the subrecipient’s organization.

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.

All match contributions must be submitted with draw documentation and be equal to or greater than the 100% match requirement for ESG by the end of the grant period.

3.2.6 Conducting Inspections on ESG Funded Shelters or Units

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

Subrecipients must establish and maintain sufficient records to enable IHFA to determine whether ESG requirements are being met. The records must include documentation of compliance with minimum standards for emergency shelter in 24 CFR 576.403, including inspection reports. IHFA may impose additional requirements and/or establish stricter standards. Additionally, IHFA’s Compliance Department will be solely responsible for completing ESG shelter inspections. The ESG minimum habitability standards for emergency shelters and permanent housing checklist created by HUD will be used to complete the inspections. Please note that if a shelter fails to meet the minimum standards, ESG funds (under either shelter
operations or renovation) may be used to bring it up to the minimum standards. For a blank copy of the inspection reports that will be used to conduct these inspections, please contact snap@ihfa.org.

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

3.2.7 References

- HUD ESG Program Toolkit: https://www.hudexchange.info/programs/esg/

3.3 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.

3.3.1 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.

3.3.2 CoC Match

Under CoC, providers agree to match 25% of funds available (“Leasing” funds do not require match contribution) 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 CoC-eligible activities within the period of the Grant Agreement.

3.3.2.1 The following are eligible types of match contributions:

3.3.2.1.1 Cash
3.3.2.1.2 In-Kind (noncash contributions)

- The value of any real property, equipment or goods contributed to the subrecipient’s CoC 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.

- The value of services contributed to the subrecipient’s CoC program, provided that if the recipient or subrecipient had to pay for them with grant funds, the costs would have been allowable. Services must be valued at rates consistent with those ordinarily paid for similar work in the subrecipient’s organization.

- Costs paid by program income shall count toward meeting the recipient’s matching requirements, provided the costs are eligible CoC costs that supplement the recipient’s CoC program.

All match contributions must be submitted with draw documentation and be equal to or greater than the 25% match requirement (“Leasing” funds do not require match contributions) for CoC by the end of the grant period.

3.3.3 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.

3.3.3.1 Eligible Activities

The following are eligible activities for Permanent Supportive Housing:

3.3.3.1.1 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.

3.3.3.1.2 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 HIC. Rental assistance may be short-term for up to 3 months; medium-term for 3 to 24 months; or long-term for more than 24 months. The length of assistance depends upon the component type under which the cost is funded. 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. Program participants may not retain their rental assistance if they relocate to a unit outside the CoC’s geographic area.

- SBRA program participants must reside in housing owned or leased by a sponsor organization and arranged through a contract between the recipient and the sponsor organization. Program participants may not retain their rental assistance if they relocate to a unit outside the project.

- PBRA program participants must reside in housing provided through a contract with the owner of an existing structure whereby the owner agrees to lease subsidized units to program participants. Program participants may not retain their rental assistance if they relocate to a unit outside the project.

When rental assistance funds are used to pay rent on units, the lease must be between the program participant and the landowner. Each program participant, on whose behalf rental assistance payments are made, must pay a contribution toward rent consistent with the requirements of the Interim Rule or the 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, or fan forced
- Stove-propane, gas, or electric
- Water-well or city service
- Sewer-septic tank or city service
- Trash
• Refrigerator—whether provided by tenant or landlord
• Stove—whether provided by tenant or landlord

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

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

3.3.3.2 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.

3.3.3.3 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.

3.3.3.4 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.

3.3.3.5 Project Administration

3.3.3.5.1 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.

3.3.3.5.2 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.
3.3.3.6 Eligible Participants

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

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

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

3.3.4 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.

3.3.4.1 Eligible Activities

3.3.4.1.1 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 organizations(s), any other related organizations, or organizations that are members of a partnership where the partnership owns the structure with a HUD-authorized exception. When leasing funds are used to pay rent on units, the lease must be between the 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.

3.3.4.1.2 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 HIC. Rental assistance may be short-term for up to 3 months, or medium-term for 3 to 24 months. Recipients must serve as many program participants as identified in their funding application to HUD, 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. Program participants may not retain their rental assistance if they relocate to a unit outside the CoC’s geographic area.

- SBRA program participants must reside in housing owned or leased by a sponsor organization and arranged through a contract between the recipient and the sponsor organization. Program participants may not retain their rental assistance if they relocate to a unit outside the project.
PBRA program participants must reside in housing provided through a contract with the owner of an existing structure whereby the owner agrees to lease subsidized units to program participants. Program participants may not retain their rental assistance if they relocate to a unit outside the project.

When rental assistance funds are used to pay rent on units, the lease must be between the program participant and the landowner. Each program participant, on whose behalf rental assistance payments are made, must pay a contribution toward rent consistent with the requirements of the Interim Rule or the 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 winterization
- Heat-wood stove, propane, gas or electric
- Heat Source-forced air, baseboard, pressurized/ceiling, or fan forced
- Stove-propane, gas, or electric
- Water Heater-propane, gas, or electric
- Water-well or city service
- Sewer-septic tank or city service
- Trash
- Refrigerator-whether provided by tenant or landlord
- Stove-whether provided by tenant or landlord

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

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

### 3.3.4.1.4 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.

### 3.3.4.1.5 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.

### 3.3.4.1.6 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.

### 3.3.4.1.7 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.

### 3.3.5.1 Eligible Participants

#### 3.3.5.1.1 Participants must meet one of the following:

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

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

### 3.4.1 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
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household increases income or is approved for affordable housing or permanent supportive housing.

3.4.1.1 Eligible Activities

The following are eligible activities for RRH:

**3.4.1.1 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 HIC. Rental assistance may be short-term for up to 3 months, or medium-term for 3 to 24 months.

Recipients must serve as many program participants as identified in their funding application to HUD, 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 survivors 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.

**3.4.1.2 Payment Requirements**

Prior to payment of rental assistance, the rental unit must pass the necessary inspections (Housing Quality Standards) and have an executed lease. For project-based, sponsor-based, or tenant-based rental assistance, program participants must enter into a lease agreement for a term of at least one year, which is terminable for cause. The leases must be automatically renewable upon expiration for terms that are a minimum of one month long, except on prior notice by either party. 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 full calendar months 1, 2, and 3. If the first month of the lease is partial and prorated, it will not
count as month 1. Each month thereafter month 3 assistance will be reassessed. If, based on rent to income ratio the participant is not able to pay full rent and utilities in months 4 and later, the participant is eligible to continue receiving rental assistance up to a total of 12 months per enrollment if the participant is adhering to all subrecipient 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. Payment Requirements

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

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.

3.4.1.2 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.

3.4.1.3 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.

3.4.1.4 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.

3.4.1.5 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.
3.4.1.6 Eligible Participants

Participants must meet one of the following:

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

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

3.4.2 References

- HUD CoC Program Toolkit: [https://www.hudexchange.info/programs/coc/](https://www.hudexchange.info/programs/coc/)

3.5 Other Applicable Federal Regulations

3.5.1 Conflicts of Interest

3.5.1.1 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.

3.5.1.2 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.

3.5.1.3 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.

3.5.1.4 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
3.5.2 Lived Experience Participation

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

- 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.

- 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.

3.5.3 Faith-Based Activities

Minimum standards for faith-based activities are:

- 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.

- 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.

- An organization receiving ESG/CoC funding shall not discriminate against a participant or prospective participation based on religion or religious beliefs.

- 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.

3.5.4 Prohibition Against Involuntary Family Separation

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

3.5.5 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).

3.5.6 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.

3.5.6.1 Minimum Standards for Termination of Assistance

3.5.6.1.1 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.

3.5.6.1.2 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:

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

3.5.6.1.3 Ability to provide further assistance.

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

3.5.7 Connection with Mainstream and Other Resources

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

3.5.8 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.
3.5.9 Lead-Based Paint

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

3.5.10 Rent Reasonableness

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

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

The following policy details how to determine and document whether a unit’s rent is reasonable for Idaho ESG funding subrecipients and HIC subrecipients.

3.5.10.1 When Rent Reasonableness Determinations are Required

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

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

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

3.5.10.2 Determining and Documenting Rent Reasonableness

Rent reasonableness can be documented in one of three ways. The first acceptable documentation method is by completing the Rent Reasonableness Certification form; this will include filling out information about the proposed unit to be rented as well as three comparable units, or “comps.” The second acceptable method of documentation is obtaining a written verification signed by the property owner or management company of the proposed unit, on letterhead, affirming that the rent for the unit assisted with CoC or ESG program funds is comparable to current rents charged for similar unassisted units managed by the same owner. The third acceptable method of documentation is to fill out and complete the official HUD Rent Reasonableness form.
If utilizing one of the Rent Reasonableness Certification forms, the form must be completed according to the instructions available with the form. The gross rent of the proposed unit must not exceed $50 over the average gross rent of the three documented comparable units.

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

3.5.10.3 Determining Comparability

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

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

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

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

3.5.10.4 Rent Reasonableness and Fair Market Rent (FMR)

3.5.10.4.1 ESG

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

3.5.10.4.2 CoC

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

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

Spending Plans may be required from subrecipients throughout the duration of their grants if a subrecipient is severely underspending on their respective grant at any time. IHFA will gauge this in relation to the percentage of time that has passed on the grant (example: 6 months of a 12 month grant = 50%) and if the subrecipient is underspending by more than 15% of their grant in relation to the time passed. IHFA will assess this on an as needed basis in order to either request amendments to slow spending grants, or to gauge a subrecipient’s capability to fully spend down their remaining funds.

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

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

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

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

3.5.13 Non-Discrimination & Reasonable Accommodations

The CoC is committed to principles of equal opportunity and fair housing.

Any CoC facilities, programs, services, and events will be made available to all qualified individuals, regardless of race, color, religion, national origin, sex (including sexual orientation, gender identity, or gender expression), familial status (the presence of minor children), or disability (whether mental, sensory or physical).

The CoC will consider all Requests for Reasonable Accommodation involving disabilities.

Reasonable Accommodations include exceptions to policies and procedures necessary to remove or minimize barriers for people with disabilities. When requested in connection with the CoC’s facilities, programs, services, and events, requests will be received and evaluated for reasonableness by management of the particular program area.
3.5.14 Violence Against Women Act (VAWA) 2022

3.5.14.1 Prohibition Against Denial of Admission and Eviction

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

3.5.14.2 Emergency Transfer Plan (See Appendix for IHFA’s Plan)

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

- ESG recipients must develop and Emergency Transfer Plan that complies with 24 CFR 576.409(d) and 24 CFR 5.2005(e) or, if the recipient is a state, the State’s subrecipients must administer ESG rental assistance and develop the Emergency Transfer Plan. If the State’s subrecipients are required to develop the plan, the State must specify whether the Emergency Transfer Plan is to be developed for:
  - The State as a whole;
  - Each area within the state covered by a CoC; or
  - Each subrecipient that administers ESG rental assistance

3.5.14.3 Lease Bifurcation

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

3.5.14.4 Notification

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

3.5.14.5 Lease Addendum

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

- The [HUD-91067 VAWA Lease Addendum](https://www.hud.gov/sites/documents/91067.docx) provides an example. HUD is updating the Agency’s VAWA forms for use by all covered housing programs.

3.5.14.6 Change to Category 4 McKinney-Vento Homeless Definition

- VAWA 2022 changes the Category 4 definition of homelessness to the following: Any individual or family who
3. Program Eligibility and Requirement

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

Under HUD’s current regulations, the Category 4 definition is: Any individual or family who:

- Is fleeing, or is attempting to flee domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual’s or family’s primary nighttime residence or has made the individual or family afraid to return to the primary nighttime residence;
- Has no other residence; and
- Lacks the resources or support networks, e.g. family, friends and faith-based or other social networks, to obtain permanent housing.

3.5.14.7 Changes to VAWA’s Definition of “Domestic Violence”

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

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

HUD will consider changes to our definition of “domestic violence” to incorporate these terms as part of rulemaking.

3.5.14.9 Compliance Requirements

- VAWA 2022 requires existing compliance review processes of grantees to include the following items for examination:
  - Compliance with VAWA requirements prohibiting the denial of assistance, tenancy, or occupancy rights on the basis of domestic violence, dating violence, sexual assault or stalking;
  - Compliance with VAWA confidentiality provisions;
  - Compliance with VAWA notification requirements;
  - Compliance with accepting VAWA documentation from survivors;
  - Compliance with emergency transfer requirements; and
  - Compliance with the prohibition on retaliation

- HUD will update reporting platforms and monitoring exhibits to examine these items during reporting and compliance monitoring.
3.5.14.10 Prohibiting Retaliation Against Survivors

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

3.5.14.11 The Right to Report Crime and Emergencies

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

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

- HUD may issue guidance and help answer questions from grantees on this process.

3.5.14.12 New Eligible Continuum of Care Activity

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

- This means that CoC grantees can use this activity to pay for activities to ensure compliance with implementing emergency transfers and monitoring compliance with VAWA confidentiality requirements.

- CoC Grantees wishing to utilize this new line item can request a budget modification to add funds to this line item from an existing line item.

- This new line item is not subject to administrative caps.

- The new line item will be built in to the CoC Program Competition Application process for FY2023.

3.5.14.13 Filing a VAWA Complaint

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

3.5.15 NSPRE (National Standards for the Physical Inspection of Real Estate)

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

4. 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
the Collaborative Applicant and HUD. 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 assessed by the Collaborative Applicant, 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 5: Systemwide Performance Measures.

The execution of HMIS/CMIS monitoring will be completed by the HMIS Lead Agency. All HMIS/CMIS users and HMIS/CMIS-participating 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.

4.1 Types of Monitoring
4.1.1 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:

- 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.
- Remote Monitor: projects assessed as moderate risk.
- Desk Monitor: projects assessed as low risk.

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

- Concern: A concern is a deficiency in project performance not based on statutory, regulatory, or other program requirements. Required sanctions or corrective actions are not authorized for concerns.
The Collaborative Applicant will bring the concern to the attention of the subrecipient via formal letter sent by email which will recommend actions to address concerns and/or offer technical assistance.

Concerns do not require a formal written response to the Collaborative Applicant.

- Finding: A finding is a deficiency in a subrecipient's project performance based on material noncompliance with a statutory, regulatory, or program requirements for which sanctions or corrective actions are authorized.
  - The Collaborative Applicant will provide documentation via formal letter sent by email. The notification will detail required action to be taken by the subrecipient.

- Non-compliance: Failure to provide written response to a finding by the specified deadline may lead to a de-obligation of funds. However, upon receipt of the Notice of De-obligation, the Subrecipient has thirty (30) days to submit a formal letter of appeal. The agency must:
  - Submit the appeal on agency letterhead, addressed to the Collaborative Applicant.
  - Present a high level of detail and explanation and must include corresponding documentation addressing the corrective action that was found to be deficient.
  - The Collaborative Applicant will consult with the HIC Executive Board, Guiding Idaho, prior to taking de-obligation actions.

4.1.2 HMIS/CMIS Privacy and Security Monitoring

HMIS and CMIS monitoring is designed to ensure compliance with privacy and security standards for personal information collected, stored in, or reported from HMIS or CMIS. The HMIS Lead agency performs annual on-site monitoring for all 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.

4.2 Recordkeeping

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

4.2.1 ESG Record Retention

ESG Subrecipients must retain all records pertaining to each fiscal year of ESG funds as outlined in their respective grant agreements. Copies made by microfilming, photocopying, or similar methods may be substituted for the original records.

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

• Where ESG funds are used to convert a building into an emergency shelter and the costs charged to the ESG grant for the conversion exceed 75 percent of the value of the building after conversion, records must be retained until 10 years after the date that ESG funds are first obligated for the conversion.

4.2.2 CoC Record Retention

Subrecipients may keep files electronically, and must be able to print them out upon request, or allow them to be viewed as part of an on-site or remote monitoring or audits. Additionally, if subrecipients use an electronic system, they must provide an adequate back-up system for the files, and ensure privacy protections that adhere to other federal privacy regulations, such as HIPAA (Health Insurance Portability & Accountability Act). There is no required timeframe for the amount of time you need to store hard files as long as the above requirements are met for your electronic files.

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

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:

• CoC records shall include the following documentation related to establishing and operating a Continuum of Care:
  o Evidence that the Board selected meets the requirements of 578.5(b).
  o 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, and approved Governance Charter that is reviewed and updated annually, a written process for selecting a board that is reviewed and updated at least every five years, evidence required for designating a singly HMIS for the CoC, and monitoring reports of recipients and subrecipients.
  o Evidence that the CoC has prepared the HUD application for funds in accordance with 578.9.

• Project Participant written records shall include:
  o 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.
  o 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).
Written Standards

4. Program Monitoring

- Determination and verification/certification that the project participant was eligible for ineligible for the particular services and/or financial assistance.

- Determination and verification/certification that the project participant lacked sufficient resources and support networks to provide the assistance.

- Determination and verification/certification that the project participant met income requirements and that an effort was made to obtain written third-party verification, when possible and applicable. This includes annual documentation of income for each project participant who receives housing assistance where rent is paid by the project participant.

- Determination and verification/certification that the only households served through permanent supportive housing meet HUD’s requirements of having a family member be a person with disabilities.

- Identification of the specific services and financial assistance amounts that were provided to the project participant.

- When applicable, verification that the services were terminated in compliance with 576.402 or 578.91.

- When adopted by the Continuum of Care, a copy of the CoC-approved centralized or coordinated assessment of the project participant.

- Copies of written leases and rental agreements, documentation of payments made, including dates of occupancy, and compliance with fair market rent, rent reasonableness and utility allowance requirements.

- Determination and verification that the housing unit met HUD’s habitability and lead-based paint standards.

- Copy of individualized housing stability plan.

- Notes verifying case management services were provided at least monthly, unless exempt from this requirement.

- Notes verifying the project participant’s eligibility was re-evaluated at least every 3 months for homelessness prevention services or at least annually for rapid rehousing services.

- Notes verifying the project participant was assisted to obtain necessary mainstream and other resources.

- Project policies and procedures shall indicate that services are coordinated with Continuum(s) of Care, other homelessness assistance/prevention programs, and mainstream service and assistance programs.

- Compliance with HUD’s ESG (24 CFR 576 and 578) requirements for:
  - Shelter and housing standards
  - Conflict of interest
  - Homeless participation
  - Faith-based activity
- Nondiscrimination, equal opportunity, and affirmative outreach
- Uniform administrative rules (2 CFR 200)
- Environmental review
- Lobbying and disclosure (2 CFR 200)
- Displacement, relocation and acquisition
- Procurement (2 CFR 200)
- Project participant records are kept secure and confidential
- Participation in HMIS or CMIS

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

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

### 4.2.3 Reporting

#### 4.2.3.1 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 HIC 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 HIC’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.”

Domestic violence 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.
- Domestic violence 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.

4.2.3.2 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.

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

4.2.4 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 domestic violence program sites will not be made public and the address or location of any housing of a project participant will not be made public.

4.2.5 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.

4.2.6 Grant and Project Changes

The recipient and subrecipients may not make any significant changes to a project without prior approval by the HIC. Once the HIC has approved the change, HUD will be provided the minutes of the HIC meeting that document the approval. If the approval is obtained via email from Guiding Idaho, 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.
5. Systemwide Performance

5.1 Performance Measurement

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

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

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

5.2 Roles and Responsibilities

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

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

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

Engaging Idaho: Engaging Idaho is responsible for communication, engagement, and participation in and for the HIC. The Engaging Idaho Committee will ensure that communication and education on the system performance measures are taking place at the Regional Coalitions. Furthermore, the committee, in partnership with the Regional Coalitions will create and perform outreach efforts to non-HUD funded projects and partners in the community to solicit feedback on system improvements. Engaging Idaho coordinates with community resources to promote awareness of available programs with the intent of increasing opportunities for homeless, and those at-risk of homelessness, to access the services they need. Engaging Idaho also oversees the two standing Advisory Boards: the Youth Advisory Board (YAB) and the Lived Experience Panel (LEP).

Regional Coalitions: These regional advisory groups will share system performance measure reports with the general membership of the Coalition. Regional Coalitions will respond to the requests from other HIC committees to provide detailed insight into factors that may positively or negatively influence the outcomes reported. Regional Coalitions will receive technical assistance from the Collaborative Applicant when necessary. 5.3 Strategy

5.3.1 Measure #1

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

5.3.2 Measure #2

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

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

5.3.3 Measure #3
Number of Homeless Persons. This measures the change in sheltered and unsheltered persons in the PIT Count and sheltered persons in HMIS. By monitoring this, the CoC will have a general sense of how the total number of homeless individuals within the CoC is trending, specifically whether the total count is declining. The CoC will also construct an estimate of resources needed throughout the geographic area, including the placement of those resources. Targets for this measure will be reviewed and adjusted each year to ensure the COC is continually moving towards achieving the goals of HUD’s federal strategic plan to end homelessness.

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

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

5.3.4 Measure #4
Employment and Income Growth for CoC-Funded Projects. This measures changes to income (earned income, non-employment income, and total income) by adult “stayers” (adult clients active in a project as of the last reporting day) and adult “leavers” (adult clients who exited during the reporting period). Regional coalitions should ensure that all CoC-funded agencies are connected to local resources, leveraging services and resources, and using SOAR.

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

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

5.3.5 Measure #5
Number of Persons First-Time Homeless. This measures the change in active persons in ES, SH, and TH as well as in ES, SH, TH, and PH with no prior enrollments in HMIS. This measure will assist in evaluating the impact of initiatives meant to reduce length of time homeless and episodes of homelessness (e.g., Housing 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.

5.3.6 Measure #6
Homelessness Prevention and Housing Placement of Persons Defined by Category 3 of HUD’s Homeless Definition in CoC Program-funded Projects. The CoC is not currently authorized to serve “Homeless Under Other Federal Statutes” (§ 578.3) meaning unaccompanied youth under 25 years of age, or families with Category 3 children and youth who do not otherwise qualify as homeless under this definition, but who: are defined as homeless under the other listed federal
statutes; have not had a lease, ownership interest in permanent housing during the 60 days prior to the homeless assistance application; have experienced persistent instability as measured by two moves or more during in the preceding 60 days; and who can be expected to continue in such status for an extended period of time due to special needs or barriers (24 CFR 578.89).

5.3.7 Measure #7

Permanent Housing Placement/Retention. This measures the change in exits to permanent housing or the retention of permanent housing. The outcomes will demonstrate adherence to Housing 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.

5.4 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 Informing Idaho Committee and Guiding Idaho Committee and the HIC. Special report requests that have not been identified as ongoing and reoccurring will be fulfilled by the HMIS Lead Agency within 30 days or sooner when possible. However, should requested reports require system development to be performed by the vendor of the HMIS software, the HMIS Lead Agency will not be expected to produce said report within 30 days. They must, however, provide a status report on the progress of the development work within 30 days.

5.5 Strategic Resource Allocation

The purpose of the HUD McKinney-Vento homeless assistance programs is to reduce the incidence of homelessness in communities by assisting individuals and families experiencing homelessness to quickly transition into permanent housing and self-sufficiency, and to assist eligible households who are at imminent risk of homelessness from becoming homeless. It is the expectation of HUD that programs funded through the McKinney-Vento homelessness programs be evaluated annually to ensure goals and objectives set by the 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.

Guiding Idaho has created goals to help the Continuum and CoC and ESG subrecipients meet certain objectives of HUD and the HIC. A project review process will be used to evaluate subrecipient performance of both federal and HIC goals. Evaluations will be assessed at least annually, and the timing of the project achievements will be completed in conjunction with HUD’s CoC annual 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 Guiding Idaho at least annually.

5.5.1 CoC Review and Ranking

CoC applications are scored competitively at both a national and local level. Nationally, HUD requires projects be ranked within either Tier 1 or Tier 2 to enforce competitive and strategic grant awards. Projects ranked in Tier 2 continue to be at greater risk of not receiving renewal funding. Locally, the 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

5.5.2 Performance Goals

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

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

5.5.3 Reallocations or Repurposing of CoC Funds

Upon the completion of renewal project application scoring, projects will be ranked in score order, highest to lowest. A threshold will be established in alignment with the percentage HUD uses to define Tier 2 ranking. 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 Guiding Idaho. 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 Guiding Idaho to make the ranking and funding decisions, the final HIC 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 Guiding Idaho who will assess the project performance at the end of the 12-month period and will determine if the project is improving in the areas identified and meeting federal and local goals. If the project performance has not improved significantly or fails to meet the 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 Guiding Idaho’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 Guiding Idaho’s approval.

### 5.5.4 New Projects

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

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

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

5.5.6 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:

5.5.6.1 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.

5.5.6.2 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 HIC’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.

5.5.6.3 Review Panel

Participation in the Independent Review Panel (IRP) will be requested through Regional Coalitions, email distribution, and the HIC’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.

5.5.6.4 Application Briefing

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

5.5.6.5 Project Priority Listing

The project priority listing will consist of the HIC’s ranking of new and renewal CoC projects. This ranking will be based on application score, threshold standards, project component type, and an assessment by the HIC. All renewal projects will be listed in score order (highest to lowest), in the manner chosen by the HIC. 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.

5.5.6.6 Funding Announcements

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

6. Coordinated Entry

6.1 Purpose

The HIC’s coordinated entry system is known as Access Point (Coordinated Entry) (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.

Access Point (Coordinated Entry) 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 HIC 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.

6.2 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 Access Point (Coordinated Entry).

6.2.1 Goals of Access Point (Coordinated Entry)

- Provide ease of access to community resources to those in need.
- “Right-size” resource allocations to reflect the needs of the 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.

6.2.2 Guiding Principles of Access Point (Coordinated Entry)

- 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 and 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.

6.3 System Participation

All homelessness assistance providers receiving HUD funding must participate in Access Point (Coordinated Entry). 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 Access Point (Coordinated Entry) Operating Procedures.
7. Appendix

7.1 Glossary of Terms
7.2 HUD Definition of Homelessness
7.3 Definition of Chronic Homelessness
7.4 Acronyms
7.5 Crosswalk of HUD Homelessness and At-Risk Definitions and Eligibility to ESG Program Components
7.6 ESG Line Item Detail
7.7 CoC Line Item Detail
7.8 Rent Reasonableness Forms
7.9 Emergency Transfer Plan
7.10 Participant File Stacking Order
7.1: GLOSSARY OF TERMS

**At-risk of Homelessness** – An individual or family who has income below 30% of area median family income for the area, as defined by HUD, and who does not have sufficient resources or support networks immediately available to prevent them from moving into an emergency shelter or other place described in the “homeless” definition and meets one of the following 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; domestic violence service providers; faith-based organizations; governments; businesses; advocates; public housing agencies; school districts; social services providers; mental health agencies; hospitals; universities; affordable housing developers; law enforcement; organizations that serve homeless and formerly homeless veterans, and homeless or formerly homeless persons that are organized to plan for and provide a system of outreach, engagement, and assessment; emergency shelter; rapid rehousing; transitional housing; permanent housing; and prevention strategies to address the various needs of homeless persons and persons at risk of homelessness for a specific geographic area.

**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, qualify, 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.

Domestic Violence Service Provider – A private nonprofit organization whose primary mission is to provide services to survivors of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, battered women’s shelters, domestic violence transitional housing programs, and other programs.
7.2: 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 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 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 flee, domestic violence;
• Has no other residence; and
• Lacks the resources or support networks to obtain other permanent housing.
7.3: DEFINITION OF CHRONIC HOMELESSNESS

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

Chronically homeless means:

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

(i) Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and

(ii) Has been homeless and living as described in paragraph (1)(i) of this definition continuously for at least 12 months or on at least 4 separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (1)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility;

(2) 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, before entering that facility; or

(3) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.
### 7.4: ACRONYM LIST

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>APR</td>
<td>Annual Performance Report</td>
</tr>
<tr>
<td>CES</td>
<td>Coordinated Entry System</td>
</tr>
<tr>
<td>COC</td>
<td>Continuum of Care</td>
</tr>
<tr>
<td>DV Shelters</td>
<td>Domestic Violence Shelters</td>
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<tr>
<td>eSNAPS</td>
<td>Electronic Special Needs Assistance Programs</td>
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<tr>
<td>ESG</td>
<td>Emergency Solutions Grant</td>
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<tr>
<td>FHA</td>
<td>Fair Housing Act</td>
</tr>
<tr>
<td>HC</td>
<td>Access Point (Coordinated Entry)</td>
</tr>
<tr>
<td>HEARTH</td>
<td>Homeless Emergency and Rapid Transition to Housing</td>
</tr>
<tr>
<td>HIC</td>
<td>Housing Idaho Collaborative</td>
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<tr>
<td>HMIS</td>
<td>Homeless Management Information System</td>
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<tr>
<td>HOME</td>
<td>Home Investment Partnerships (CPD program)</td>
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<tr>
<td>HOPWA</td>
<td>Housing Opportunities for People with HIV or Aids</td>
</tr>
<tr>
<td>HUD</td>
<td>US Department of Housing and Urban Development</td>
</tr>
<tr>
<td>IDHW</td>
<td>Idaho Health and Welfare</td>
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<tr>
<td>IDOC</td>
<td>Idaho Department of Commerce</td>
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<tr>
<td>IDOC</td>
<td>Idaho Department of Corrections</td>
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<tr>
<td>IFHC</td>
<td>Intermountain Fair Housing Council</td>
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<td>IHFA</td>
<td>Idaho Housing and Finance Association</td>
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<tr>
<td>IRP</td>
<td>Independent Review Panel</td>
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<tr>
<td>IRP</td>
<td>Idaho Rural Partnership</td>
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<tr>
<td>NOFA</td>
<td>Notice of Funding Availability</td>
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<tr>
<td>PBRA</td>
<td>Project Based Rental Assistance</td>
</tr>
<tr>
<td>PIT</td>
<td>Point in Time</td>
</tr>
<tr>
<td>PHA</td>
<td>Public Housing Agency</td>
</tr>
<tr>
<td>PIH</td>
<td>Public and Indian Housing Department of HUD (Section 8 programs)</td>
</tr>
<tr>
<td>PBRA</td>
<td>Project Based Rental Assistance</td>
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<tr>
<td>PSH</td>
<td>Permanent Supportive Housing</td>
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<td>ROI</td>
<td>Release of Information</td>
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<td>SBRA</td>
<td>Sponsor Based Rental Assistance</td>
</tr>
<tr>
<td>Abbreviation</td>
<td>Description</td>
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<td>--------------</td>
<td>--------------------------------------------</td>
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<tr>
<td>SNAP</td>
<td>Special Needs Assistance Programs</td>
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<tr>
<td>SRO</td>
<td>Single Room Occupancy</td>
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<tr>
<td>SS</td>
<td>Supportive Services</td>
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<tr>
<td>SSVF</td>
<td>Supportive Services for Veteran Families</td>
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<tr>
<td>STRMU</td>
<td>Short term rent, mortgage or utility assistance</td>
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<tr>
<td>TANF</td>
<td>Temporary Assistance for Needy Families</td>
</tr>
<tr>
<td>TBRA</td>
<td>Tenant Based Rental Assistance</td>
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<td>TH</td>
<td>Transitional Housing</td>
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</tbody>
</table>
7.5: 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
7.6: ESG LINE ITEM DETAIL

<table>
<thead>
<tr>
<th>ESG Program Description of Eligible Costs 24 CFR 576</th>
</tr>
</thead>
</table>

**Eligible Costs From the HEARTH regulations:**

### Emergency Shelter

<table>
<thead>
<tr>
<th>Services</th>
<th>24 CFR 576.102</th>
<th>ESG funds may be used to provide essential services to individuals and families and individuals, and operating emergency shelters.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Case Management</td>
<td>The cost of assessing, arranging, coordinating and monitoring the delivery of individualized services to meet the needs of the program participant is eligible</td>
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<tr>
<td>Using the centralized or coordinated assessment system as required under §576.400d</td>
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<tr>
<td>Conducting the initial evaluation required under §576.401(a), including verifying and documenting eligibility</td>
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<tr>
<td>Developing, securing, and coordinating services and obtaining Federal, State, and local benefits</td>
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<tr>
<td>Monitoring and evaluating program participant progress</td>
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<tr>
<td>Providing information and referrals to other providers</td>
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</tr>
<tr>
<td>Providing ongoing risk assessment and safety planning with survivors of domestic violence, dating violence, sexual assault, and stalking</td>
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<tr>
<td>Developing an individualized housing and service plan, including planning a path to permanent housing stability.</td>
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</tbody>
</table>

### 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

<p>| 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 |</p>
<table>
<thead>
<tr>
<th>Written Standards</th>
<th>Testing; individual or group instruction; tutoring; provision of books, supplies and instructional material; counseling; and referral to community resources.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Employment Assistance and Job Training</strong></td>
<td>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.</td>
</tr>
<tr>
<td></td>
<td>Cost of providing reasonable stipends to program participants in employment assistance and job training programs.</td>
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<tr>
<td></td>
<td>Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.</td>
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<td></td>
<td>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.</td>
</tr>
<tr>
<td><strong>Outpatient Health Services</strong></td>
<td>Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals.</td>
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<td></td>
<td>Funds may be used only for these services to the extent that other appropriate health services are unavailable within the community.</td>
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<td></td>
<td>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.</td>
</tr>
<tr>
<td><strong>Life Skills</strong></td>
<td>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</td>
</tr>
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</table>
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.

<table>
<thead>
<tr>
<th>Mental Health Services</th>
<th>Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions.</th>
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<tbody>
<tr>
<td></td>
<td>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.</td>
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<tr>
<td></td>
<td>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 martial relationships, parent-child problems, or symptom management.</td>
</tr>
<tr>
<td></td>
<td>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.</td>
</tr>
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</table>

<table>
<thead>
<tr>
<th>Substance Abuse Treatment Services</th>
<th>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.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>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.</td>
</tr>
<tr>
<td></td>
<td>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.</td>
</tr>
</tbody>
</table>
## Homeless Prevention and Rapid Rehousing

<table>
<thead>
<tr>
<th>Homeless Prevention 24 CFR 576.103</th>
<th>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 &quot;homeless&quot; definition in 576.2.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Housing Relocation and Stabilization Financial 24 CFR 576.105</td>
<td><strong>Financial Assistance costs</strong>—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).</td>
</tr>
<tr>
<td><strong>Housing Relocation and Stabilization Services 24 CFR 576.105</strong></td>
<td><strong>Housing Search and Placement</strong> - 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.</td>
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<tr>
<td><strong>Housing Stability Case Management</strong> - 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.</td>
<td></td>
</tr>
<tr>
<td><strong>Short Term and Medium Term Tenant-Based Rental Assistance (Rent) 24 CFR 576.106</strong></td>
<td>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.</td>
</tr>
<tr>
<td><strong>Rapid Rehousing 24 CFR 576.104</strong></td>
<td>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.</td>
</tr>
<tr>
<td><strong>Housing Relocation and Stabilization Financial 24 CFR 576.105</strong></td>
<td><strong>Financial Assistance costs</strong> - 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,</td>
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</table>
electric, water and sewage.), moving costs (temporary storage fees up to 3 months, temporary storage fees in arrears is not eligible).

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<tr>
<th>Housing Relocation and Stabilization Services 24 CFR 576.105</th>
<th><strong>Housing Search and Placement</strong>-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.</th>
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<tbody>
<tr>
<td>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.</td>
<td><strong>Housing Stability Case Management</strong>- 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.</td>
</tr>
</tbody>
</table>
| **Short Term and Medium Term Tenant-Based Rental Assistance(Rent)** 24 CFR 576.106 | **HMIS 24 CFR 576.107** Purchasing or leasing computer hardware, software and/or software licenses  
Leasing office space, equipment, furniture, and utilities for HMIS activities  
Salaries, operating costs, and duties as required to operate an HMIS  
Trainings related to the use of HMIS  
Reporting to COC on HMIS |
### Admin. 24 CFR 576.108

<table>
<thead>
<tr>
<th>Item</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>General management, oversight, coordination, monitoring and evaluation</td>
<td></td>
</tr>
<tr>
<td>Salaries, wages and related costs</td>
<td></td>
</tr>
<tr>
<td>Reports for sub-recipient to HUD</td>
<td></td>
</tr>
<tr>
<td>Evaluate program results</td>
<td></td>
</tr>
<tr>
<td>Resolution of audit or monitoring findings</td>
<td></td>
</tr>
<tr>
<td>Managing or supervising staff completing any of the above mentioned items.</td>
<td></td>
</tr>
<tr>
<td>Training on ESG requirements</td>
<td></td>
</tr>
<tr>
<td>Administrative services for administration of the program</td>
<td></td>
</tr>
<tr>
<td>Items such as labels, paper, postage, stamps, etc.</td>
<td></td>
</tr>
</tbody>
</table>

#### Additional information

1. HUD requires collaboration with mainstream resources. If services are being provided in your local area, then ESG funds should not be used to provide that service.

2. Inventory - please track items for equipment and furniture that have one useful year of life and are over $5,000. Items purchased with HUD funds should be tracked on an inventory sheet so they can be reviewed at monitoring. Your Fiscal Officer should be maintaining a depreciation schedule so that items can be removed from inventory at the point of depreciation to zero.
# 7.7: 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 | The cost of assessing, arranging, coordinating and monitoring the delivery of individualized services to meet the needs of the program participant(s). Component services and costs include: |
| | - Counseling. |
| | - Developing, securing and coordinating services. |
| | - Using the centralized or coordinated assessment system as required under 24 CFR part 578.23(c)(9). |
| | - Obtaining federal, state and local benefits. |
| | - Monitoring and evaluating program participant progress. |
| | - Providing ongoing risk assessment and safety planning for survivors of domestic violence, sexual assault, and stalking. |
- Developing an individualized housing and service plan, including a path to permanent housing stability.

- Conducting the required annual assessment of program participants' service needs (24 CFR part 578.53(a)(2)).

- Initial drug testing (this needs to apply to all participants and only at initial entry).

- Phones for the Case Manager's use and the main office phone (pro-rated costs).

- Child care for participants' children during case management.

<table>
<thead>
<tr>
<th>Child Care</th>
<th>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:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>- Children are under age 13, unless they have a disability.</td>
</tr>
<tr>
<td></td>
<td>- The child care center is licensed by the jurisdiction in which it operates in order for its costs to be eligible.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Education Services</th>
<th>Costs of improving knowledge and basic educational skills, including:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>- Instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a second language, and General Educational Development (GED).</td>
</tr>
</tbody>
</table>

|                    | - 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. |

<table>
<thead>
<tr>
<th>Employment Assistance and Job Training</th>
<th>Costs of establishing and operating employment assistance and job training programs, including:</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>- Classroom, online, and/or computer instruction.</td>
</tr>
</tbody>
</table>

|                                       | - On-the-job instruction.                                                                         |

|                                       | - Services that assist individuals in securing employment, including:                             |

|                                       | - Employment screening, assessment, or testing.                                                    |

|                                       | - Structured job skills and job-seeking skills.                                                    |
- Special training and tutoring, including literacy training and pre-vocational training.

- Books and instructional material.

- Counseling or job coaching.

- Referral to community resources.

- Services that assist individuals in acquiring learning skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.

- Services that assist individuals in increasing their earning potential.

- The cost of providing reasonable stipends to program participants in employment assistance and job training programs.

<table>
<thead>
<tr>
<th>Food</th>
</tr>
</thead>
<tbody>
<tr>
<td>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.</td>
</tr>
</tbody>
</table>

- Groceries could be construed as both food and basic, essential household supplies (toilet paper and hygiene supplies can be included).

<table>
<thead>
<tr>
<th>Housing Search and Counseling Services</th>
</tr>
</thead>
<tbody>
<tr>
<td>Costs of helping eligible program participants locate, obtain, and retain suitable housing. Component services or costs include:</td>
</tr>
</tbody>
</table>

- 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:

- The cost of a recipient's or subrecipient's staff assigned to accompany or assist program participants in using public transportation. If public transportation options are not sufficient within the area, the recipient may make a one-time payment on behalf of a program participant needing car repairs or maintenance required to operate a personal vehicle, subject to the following:

  - Payments for car repairs or maintenance on behalf of the program participant may not exceed 10 percent of the Blue Book value of the vehicle (Blue Book refers to the guidebook that compiles and quotes prices for new and used automobiles and other vehicles of all makes, models, and types).

  - Payments for car repairs or maintenance must be made by the recipient or subrecipient directly to the third party that repairs or maintains the car.

  - Recipients or subrecipients may require program participants to share in the cost of car repairs or maintenance as a condition of receiving assistance with car repairs or maintenance.

  - Gas vouchers are no longer eligible to be reimbursed; i.e.: this includes gas cards, filling up gas tanks, etc.

### Utility Deposits

Costs associated with utility deposits, which must be a one-time fee, paid to utility companies. (Certain other move-in costs, including security deposits and first and last months' rent, are eligible costs under leasing and rental assistance.)
<table>
<thead>
<tr>
<th>Operations Costs associated with day-to-day physical operation of housing in which homeless persons are housed</th>
<th>Maintenance and repair of housing.</th>
</tr>
</thead>
<tbody>
<tr>
<td>24 CFR 578.55</td>
<td>Property taxes and insurance.</td>
</tr>
<tr>
<td></td>
<td>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).</td>
</tr>
<tr>
<td></td>
<td>Building security (staff).</td>
</tr>
<tr>
<td></td>
<td>Electricity, gas, water, sewer and garbage (participants' phone and internet is not included).</td>
</tr>
<tr>
<td></td>
<td>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.</td>
</tr>
<tr>
<td></td>
<td>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.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>HMIS 24 CFR 578.57 - HMIS or Comparable Database</th>
<th>Purchasing or leasing computer hardware, software and/or software licenses.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Leasing office space, equipment, furniture, and utilities for HMIS activities.</td>
</tr>
<tr>
<td></td>
<td>Salaries, operating costs, and duties as required to operate an HMIS.</td>
</tr>
<tr>
<td></td>
<td>Trainings related to the use of HMIS.</td>
</tr>
<tr>
<td></td>
<td>Reporting to COC on HMIS.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Administrative Costs 24 CFR 578.59</th>
<th>General management, oversight, coordination, monitoring and evaluation.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Salaries, wages and related costs of the recipient's staff, the staff of subrecipients, or other staff engaged in program administration.</td>
</tr>
<tr>
<td></td>
<td>Reports for sub-recipient to send to IHFA so they can submit to HUD.</td>
</tr>
<tr>
<td></td>
<td>Evaluate program results.</td>
</tr>
</tbody>
</table>
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.

<table>
<thead>
<tr>
<th>Ineligible Items</th>
</tr>
</thead>
<tbody>
<tr>
<td>1-Program fees are not allowed to be charged in COC program.</td>
</tr>
<tr>
<td>2-Program income cannot be used as match and cannot cover costs that are ineligible COC expenses.</td>
</tr>
<tr>
<td>3-Match cannot cover costs that are ineligible COC expenses.</td>
</tr>
<tr>
<td>4-HUD has determined house phones to be an ineligible cost and ineligible match item. Replacement resources for house phones include:</td>
</tr>
</tbody>
</table>

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.

<table>
<thead>
<tr>
<th>Additional information</th>
</tr>
</thead>
<tbody>
<tr>
<td>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.</td>
</tr>
<tr>
<td>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).</td>
</tr>
<tr>
<td>3-Non-consumable personal items such as sheets, towels, etc. cannot be purchased with COC funds. Some stores will donate them.</td>
</tr>
</tbody>
</table>
# 7.8: RENT REASONABLENESS FORMS

**Rent Reasonableness Certification Form**  
Special Needs Assistance Programs (COC, ESG)  
Idaho Housing and Finance Association

<table>
<thead>
<tr>
<th>Landlord Information</th>
<th>Proposed Unit Overview</th>
</tr>
</thead>
<tbody>
<tr>
<td>Owner/Manager:</td>
<td>Participant Name or Identifier:</td>
</tr>
<tr>
<td>Full Address:</td>
<td>Full Unit Address:</td>
</tr>
<tr>
<td>Phone:</td>
<td>Type of Unit:</td>
</tr>
<tr>
<td>E-mail (optional):</td>
<td>Square Footage:</td>
</tr>
<tr>
<td>Website (optional):</td>
<td>Number of Bedrooms:</td>
</tr>
<tr>
<td></td>
<td>Year Built:</td>
</tr>
</tbody>
</table>

## Proposed Unit Details

### Amenities

| No. of baths:   |
| Dishwasher:     |
| W/D Hookup:     |
| Refrigerator:   |
| Range/Oven:     |
| A/C:            |
| Heat:           |

### Management & Maintenance

| On-Site Manager (Y/N): |
| Owner-Supplied Utilities: |
| Tenant-Supplied Utilities: |

## Rent Reasonableness Comparison

<table>
<thead>
<tr>
<th>Proposed Unit</th>
<th>Comparable #1</th>
<th>Comparable #2</th>
<th>Comparable #3</th>
<th>Average of Comparables</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reference #</td>
<td>N/A</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Contract Rent</td>
<td>$</td>
<td>$</td>
<td>$</td>
<td>$</td>
</tr>
<tr>
<td>--------------</td>
<td>---</td>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>Special Details:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

___________________________  __________________________
Completed By (Type Name)      Date

___________________________
Agency
# Comparable Unit Details Form

Special Needs Assistance Programs (COC, ESG)

Idaho Housing and Finance Association

<table>
<thead>
<tr>
<th>Landlord Information</th>
<th>Unit Overview</th>
</tr>
</thead>
<tbody>
<tr>
<td>Owner/Manager:</td>
<td>Full Address:</td>
</tr>
<tr>
<td>Full Address:</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Number of Bedrooms:</td>
</tr>
<tr>
<td></td>
<td>Square Footage:</td>
</tr>
<tr>
<td>Phone:</td>
<td>Type of Unit:</td>
</tr>
<tr>
<td>E-mail (optional):</td>
<td>Year Built:</td>
</tr>
<tr>
<td>Website (optional):</td>
<td>Contract Rent:</td>
</tr>
</tbody>
</table>

## Unit Details

### Amenities

- No. of baths: 
- Dishwasher: 
- W/D Hookup: 
- Refrigerator: 
- Range/Oven: 
- A/C: 
- Heat: 

### Management & Maintenance

- On-Site Manager (Y/N): 
- Owner-Supplied Utilities: 
- Tenant-Supplied Utilities: 

### Rent Change Information

- Rent Amount: Date: Initials: 
- Rent Amount: Date: Initials: 
- Rent Amount: Date: Initials: 

Revision 8/11/2023  Page 82 of 104
Rent Amount: ____________ Date: ____________ Initials: ______
Rent Amount: ____________ Date: ____________ Initials: ______

__________________________
Completed By (Type Name)  Date
Rent Reasonableness Certification Form
Special Needs Assistance Programs
Idaho Housing and Finance Association

<table>
<thead>
<tr>
<th>Required Fields</th>
<th>Proposed Unit</th>
<th>Comp #1</th>
<th>Comp #2</th>
<th>Comp #3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of Bedrooms</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Square Footage</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Type of Unit</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Utilities included in rent</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Optional Fields
(at least 2 fields must be completed for all units)

<table>
<thead>
<tr>
<th>Optional Fields</th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of Bathrooms</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Year Built</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Handicap Accessible?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other Amenities</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Required Fields</th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Base Unit Rent (on lease)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Utility Allowance</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gross Rent</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Source:                           |               |         |         |         |

Average Comp Gross Rent:         |               |         |         |         |

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

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

Completed By (Type Name)          | Date

Agency
7.9 EMERGENCY TRANSFER PLAN

Housing Idaho Collaborative (HIC)

Emergency Transfer Plan:

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

Emergency Transfers

The Housing Idaho Collaborative (HIC) is concerned about the safety of the participants of the programs that are funded by CoC, Emergency Solutions Grant (ESG), and Coordinated Entry (CE) Program grant funds, and such concern extends to participants who have experienced or are experiencing domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA)1, CoC, ESG, and CE Program-funded projects2 providing permanent housing (Rapid Re-Housing, or RRH, or Permanent Supportive Housing, or (PSH) or transitional housing must allow participants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the participant’s current unit to another unit. For purposes of this policy, an internal emergency transfer refers to an emergency relocation of a tenant to another unit where the tenant would not be categorized as a new applicant; that is, the tenant may reside in the new unit without having to undergo an application process. An external emergency transfer refers to an emergency relocation of a tenant to another unit where the tenant would be categorized as a new applicant; that is the tenant must undergo an application process in order to reside in the new unit. Safe unit refers to a unit that the victim of domestic violence believes is safe. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.3 The ability of a housing project to honor such a request for participants currently receiving assistance, however, may depend upon a preliminary determination that the participant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether the housing project is able to locate another dwelling unit that is available and is safe to offer the participant for temporary or more permanent occupancy.

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

Eligibility for Emergency Transfers

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

- The project participant expressly requests the transfer; and
- The project participant reasonably believes that there is a threat of imminent harm from further violence if the project participant remains within the same unit; or
- The project participant has experienced sexual assault, then the project participant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.
A project participant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan. Project participants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

**Emergency Transfer Request Documentation**

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

- A statement expressing that the project participant reasonably believes that there is a threat of imminent harm from further violence if the project participant were to remain in the same dwelling unit assisted under the housing project; OR

- A statement that the participant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the participant’s request for an emergency transfer.

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

**Confidentiality**

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

- Enter the information into any shared database except the authorized DV comparable database;

- Allow any individual administering assistance or other services on behalf of the providers and/or property owner or manager (for example, employees and contractors) to have access to confidential information unless for reasons that specifically call for these individuals to have access to this information under applicable Federal, State, or local law.; or

- Provide the information to any other entity or individual, except to the extent that the disclosure is:
o Requested or consented to by the individual, in writing, stating permission to release the information on a time-limited basis;

o Needed by the housing provider to use in an eviction or termination proceeding, such as to evict your abuser or perpetrator or terminate your abuser or perpetrator from assistance under this program.; or

o Otherwise required by applicable law.

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

Emergency Transfer Timing and Availability

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

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

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

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

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

- The individual or family meets all eligibility criteria required by Federal law or regulation or HUD NOFA;

- The individual or family meets any additional criteria or preferences established in accordance with 24 CFR 578.93(b)(1), (4), (6), or (7).

For the purposes of this plan, immediately available means a vacant unit, ready for move-in with a reasonable period of time.
The individual or family shall retain their original homeless status or status of homeless chronicity for the purposes of the transfer. In cases where a household receiving participant-based rental assistance separates in order to initiate an emergency transfer, the housing project will work with the CoC Technical Assistance and Performance Coordinator to determine the appropriate actions with respect to the non-transferring family member(s). All confidentiality provisions apply for the victim in this situation.

**Safety and Security of Participants**

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

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

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


**Tracking Requests and Outcomes**

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

**Related Documents and Attachments**

- **Attachment A:** Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, HUD Form 5383
- **Attachment B:** Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking and Alternate Documentation, HUD Form 5382
- **Attachment C:** State organizations providing services to survivors of domestic violence, dating violence, sexual assault, or stalking

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

- **Attachment D:** Emergency Transfer Requests and Outcomes Log

  1. Despite the name of this law, VAWA protection is available to all victims of domestic violence, dating violence, sexual assault,
and stalking, regardless of sex, gender identity, or sexual orientation.

2. For purposes of this plan, "CoC Program-funded projects" include any permanent or transitional housing projects that are supported by CoC Program grant funds.

3. Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.
Attachment A: HUD Form 5383

EMERGENCY TRANSFER U.S. Department of Housing OMB Approval No. 2577-0286
REQUEST FOR CERTAIN and Urban Development Exp. 06/30/2017

VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING

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

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

The requirements you must meet are:

(1) You are a victim of domestic violence, dating violence, sexual assault, or stalking. If your housing provider does not already have documentation that you are a victim of domestic violence, dating violence, sexual assault, or stalking, your housing provider may ask you for such documentation. In response, you may submit Form HUD-5382, or any one of the other types of documentation listed on that Form.

(2) You expressly request the emergency transfer. Submission of this form confirms that you have expressly requested a transfer. Your housing provider may choose to require that you submit this form, or may accept another written or oral request. Please see your housing provider’s emergency transfer plan for more details.

(3) You reasonably believe you are threatened with imminent harm from further violence if you remain in your current unit. This means you have a reason to fear that if you do not receive a transfer you would suffer violence in the very near future.

OR

You are a victim of sexual assault and the assault occurred on the premises during the 90-calendar-day period before you request a transfer. If you are a victim of sexual assault, then in addition to qualifying for an emergency transfer because you reasonably believe you are threatened with imminent harm from further violence if you remain in your unit, you may qualify for an emergency transfer if the sexual assault occurred on the premises of the property from which you are seeking your transfer, and that assault happened within the 90- calendar-day period before you submit this form or otherwise expressly request the transfer.
Submission of Documentation: If you have third-party documentation that demonstrates why you are eligible for an emergency transfer, you should submit that documentation to your housing provider if it is safe for you to do so. Examples of third party documentation include, but are not limited to: a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health care provider, or other professional from whom you have sought assistance; a current restraining order; a recent court order or other court records; a law enforcement report or records; communication records from the perpetrator of the violence or family members or friends of the perpetrator of the violence, including emails, voicemails, text messages, and social media posts.

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

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

1. Name of victim requesting and emergency transfer: _________________________________

2. Your name (if different from victim’s): _________________________________

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

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

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

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

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

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

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

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

11. Describe why the victim believes they are threatened with imminent harm from further violence if they remain in their current unit.
    ____________________________________________________________________________
    ____________________________________________________________________________
    ____________________________________________________________________________
12. If voluntarily provided, list any third-party documentation you are providing along this notice:

____________________________________________________________________________
____________________________________________________________________________

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

Signature _______________________________  Signed on (Date) _____________________
Attachment B: HUD Form 5382

| CERTIFICATION OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING AND ALTERNATE DOCUMENTATION | U.S. Department of Housing and Urban Development | OMB Approval No. 2577-0286 Exp. 06/30/2017 |

**Purpose of Form:** The Violence Against Women Act (“VAWA”) protects applicants, participants, and program participants in certain HUD programs from being evicted, denied housing assistance, or terminated from housing assistance based on acts of domestic violence, dating violence, sexual assault, or stalking against them. Despite the name of this law, VAWA protection is available to victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

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

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

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

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

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

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

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

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

1. Date the written request is received by victim: _____________________________________________

2. Name of victim:_____________________________________________________________________

3. Your name (if different from victim’s): ________________________________________________

4. Name(s) of other family member(s) listed on the lease: ____________________________________

5. Residence of the victim: _____________________________________________________________

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

7. Relationship of the accused perpetrator to the victim: _________________________________

8. Date(s) and time(s) of incident(s) (if known): __________________________________________

9. Location of incident(s): ____________________________________________________________

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

____________________________________________________________________________________

____________________________________________________________________________________

____________________________________________________________________________________

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

Signature______________________________________ Signed on (Date)________________

Public Reporting Burden: The public reporting burden for this collection of information is estimated to average 1 hour per response. This includes the time for collecting, reviewing, and reporting the data. The information provided is to be used by the housing provider to request certification that the applicant or participant is a victim of domestic violence, dating violence, sexual assault, or stalking. The information is subject to the confidentiality requirements of VAWA. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid Office of Management and Budget control number.
Attachment C: Statewide Resources

Domestic Violence, Sexual Assault and Stalking Resources

Regions 1-7:

- National Domestic Violence Hotline – 1-800-799-7233 or 1-800-787-3224
- National Sexual Assault Hotline (RAINN) – www.rainn.org 1-800-656-4673
- Legal Aid of Idaho Domestic Violence Advice Line - 877-500-2980
- Idaho Domestic Violence Hotline - 1-800-669-3179

Child Abuse Reporting - 1- 1-855-552-KIDS (1-855-552-5437)

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

Safe Passage

- 24-hour Hotline: 208-664-9303

Shoshone County Women’s Resource Center

- Business Phone: 208-556-0500

Boundary County Crisis Center

- Business Phone: 208- 267-7334

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

Alternatives to Violence of the Palouse

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

YWCA Lewiston

- 24-hour Hotline: 208-746-9655

Solutions

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

Wilson Psychological Services

- 509-334-0782

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

Hope’s Door (women & children)

- 24-hour Hotline: 208-459-6279
Rose Advocates
- Business phone: 208-642-1025
- 24-hour Hotline: 208-414-0740

Elmore County Domestic Violence Council
- Business phone: 208-590-0379
- 24-hour Hotline: 208-587-3300

Advocates Against Family Violence
- 24-hour Hotline: 208-459-4779

Nampa Family Justice Center
- Business phone: 208-475-5700
- 24-hour Hotline: 800-621-4673

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

Voices Against Violence
- 24-hour Hotline: 208-733-0100

The Advocates
- 24-hour Hotline: 208-788-4191

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

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

Bingham County Crisis Center
- Business Phone: 208-785-1047
- 24-hour Hotline: 208-681-8712

Oneida Crisis Center
- Business Phone: 208-766-4412
- 24-hour Hotline: 208-766-3119

Women’s Advocates
- 24 hour Crisis line 251-HELP

Bright Tomorrows Child Advocacy Center
- 234-2646
Region 6: Counties: Bonneville, Butte, Clark, Custer, Fremont, Jefferson, Lemhi, Madison, Teton

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

Region 7: Ada County

Women’s and Children’s Alliance
- 24-Hour Domestic Abuse Hotline: 208.343.7025
- 24-Hour Sexual Assault Hotline: 208.345.7273 (RAPE)

Legal Resources

Regions 1-7:
- Idaho Legal Aid Services, Inc. – www.idaholegalaid.org 208-746-7541
- National Center for Victims of Crime (NCVC) – www.victomsfcvcrime.org info@victimsofcrime.org
- Intermountain Fair Housing Council contact@ifhcidaho.org 208-383-0695
- Idaho Human Rights Commission www.humanrights.idaho.gov Phone 1-208-334-2873
- U.S. Attorney’s Office www.justice.gov/usao-id Phone 208-334-9204
- Idaho Senior Legal Hotline 1-866-345-0106
- Adult Protection Services 1-800-877-3206
- Idaho Volunteer Lawyers 800-221-3295
- Legal Aid of Idaho Domestic Violence Advice Line 877-500-2980
- Attorney General of Idaho (208) 334-2400
- Crime Victim Compensation Program 800-950-2110

Additional Region 2 Legal Aid:

YWCA Lewiston
- 24-hour Hotline: 208-746-9655

Latah County Court Assistance
- 208-882-8580

University of Idaho Legal Aid Clinic
• 208-885-6541

Nez Perce County Court Services
• 1113 F St Lewiston, ID 799-3176

Nez Perce County Court Assistance Office
• 1230 Main Lewiston, ID 2nd Floor 799-3191

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

**HIC Emergency Transfer Requests and Outcomes Log**

Organization: _________________________________________________________________

Contact Person: _______________________________________________________________

Email: _______________________________ Phone Number: __________________________

For the time period: ____________________________________________________________

<table>
<thead>
<tr>
<th>#</th>
<th>Date Emergency Transfer was Requested</th>
<th>Outcome of Emergency Transfer (Granted/Denied)</th>
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</table>
7.10: PARTICIPANT FILE STACKING ORDER

Housing Idaho Collaborative (HIC)

ESG Shelter File stack order

Tab 1: Eligibility
- Intake Assessment/Application
- Homeless Status – with backup documentation
- Program Rules – Signed
- Grievance/Termination Rules – Signed
- HMIS/CMIS – Signed
- Any Release/Consent Forms – Signed

Tab 2: Services and Assistance
- Housing Planning
- Mainstream Resource Tracker
- Case Management Tracker
- Services Provided Tracker

Tab 3: Correspondence
- Participant Notices
- Any participant communication

Tab 4: Exit
- Any exit documentation
- Exit Survey
- Proof of Exit from HMIS/CMIS

ESG HP and RRH File stack order

Tab 1: Eligibility
- Intake Assessment
- Application
- Homeless Status – with backup documentation
- Disability Status – with backup documentation (not required in every program)
- Program Rules – Signed
- Grievance/Termination Rules – Signed
- HMIS/CMIS – Signed
- Any Release/Consent Forms – Signed

Tab 2: Income and Assets
- Income Calculation Worksheet at Intake (Need to see how the income is calculated)
Income verifications at Intake
Asset Calculation Worksheet at Intake (Need to verify all assets, third party)
Asset verifications at Intake

Tab 3: Lease and Recertification/Addendums
- Initial Lease
- Recertification/Addendums: (Newest to oldest)
- VAWA
- Utility Allowance
- Rent Reasonableness
- Income Limits (show source used)
- HQS inspections
- Lead-Based Paint disclosure

Tab 4: Services and Assistance
- Housing Planning
- Mainstream Resource Tracker
- Case Management Tracker (monthly)
- Services Provided Tracker/monthly reassessment of rental needs.

Tab 5: Correspondence
- Participant Notices
- Any participant communication

Tab 6: Exit
- Any exit documentation
- Exit Survey
- Proof of Exit from HMIS/CMIS

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

Tab 2: Income and Assets
- Income Calculation Worksheet at Intake (Need to see how the income is calculated)
- Income verifications at Intake
- Asset Calculation Worksheet at Intake (Need to verify all assets, third party)
- Asset verifications at Intake

**Tab 3: Lease and Recertification/Addendums**

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

**Tab 4: Services and Assistance**

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

**Tab 5: Correspondence**

- Participant Notices
- Any participant communication or recommendation letters

**Tab 6: Exit**

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