



Consolidated Homeless Fund Policies and Procedures Manual

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I. General Information and Background

A. What is the Consolidated Homeless Fund (CHF)?

The Consolidated Homeless Fund Program (CHF) in Rhode Island is designed to be the first step in the continuum of assistance to prevent and end homelessness and to enable homeless individuals and families to move toward independent living. In 2012, the Emergency Solution Grant (ESG) Entitlement Cities of Pawtucket, Providence and Woonsocket joined with the Rhode Island Office of Housing and Community Development (OHCD), Housing Resources Commission and The Rhode Island Department of Human Services to create the Consolidated Homeless Fund Program (CHF) Partnership (The Partnership). The reasons/purposes for establishing The Partnership are as follows:

- To reduce administrative burden on grantees while allowing more resources and time to be allocated to client services through the issuance of a coordinated Request for Proposals;
- To develop consistent policies and procedures across state and municipal boundaries to allow for more effective and efficient programs and services; and
- To increase efficiency and reduce the duplication of administrative efforts across municipal and state units of government.

B. CHF Program Philosophy

The CHF encourages providers to follow the Housing First Principles established by the RI CoC, when appropriate, to ensure a systematic approach to ending homelessness. Housing First is 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 (except that RRH providers are required to provide case management in accordance with 24 CFR 576.104).

The outcomes that The Partnership hopes to achieve through effective programming, include, but are not limited to the following:

- Increased program exits to permanent housing;
- Increased client participation in mainstream resources;
- Decreased length of shelter stays;
- Elimination or reduction of repeated episodes of homelessness;
- Increased income (employment and/or benefits) to clients; &
- Decreased shelter program entries because of prevention or diversion efforts.

C. CHF and Emergency Solutions Grant Program

Because, the State Office of Housing and Community Development (OHCD) and each of the Emergency Solution Grant (ESG) Entitlement Cities of Pawtucket, Providence and Woonsocket receive federal funding from the ESG program authorized by subtitle B of title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11371–11378) as amended by the HEARTH Act, **CHF program requirements are derived from ESG program rules and regulations, unless otherwise specified.**

Through the ESG program, the Department of Housing and Urban Development (HUD) makes grants to States, units of general local government, and territories for:

- rehabilitation or conversion of buildings for use as emergency shelters for the homeless;
- payment of certain expenses related to operating emergency shelters;
- essential services related to emergency shelters and street outreach for the homeless; and
- homelessness prevention and rapid re-housing assistance.

The Emergency Solutions Grants Program is one of four homeless assistance programs operated by the Department of Housing and Community Development's Office of Special Needs and Assistance Programs. The other three are the Supportive Housing Program (SHP), Shelter Plus Care (SPC) Program and Section 8 Single Room Occupancy (SRO) Program. Descriptions of these programs can be found on HUD's website at <http://www.hud.gov/cpd/homeless.html>.

D. CHF and Continuum of Care (COC)

The CHF Partnership consults with the RI Continuum of Care on the following:

- how to allocate Emergency Solutions Grant Funds each program year;
- developing performance standards for and evaluating the outcomes of projects and activities assisted by ESG funds; and
- ensuring that all programs receiving ESG funds are utilizing the Coordinated Entry System established by the COC.

E. CHF and the Office of Housing & Community Development

The Office of Housing and Community Development is responsible for CHF program design and as such is responsible for the following:

- Issuing CHF Requests for Proposals;
- Coordinating and managing the CHF application review process;
- Conducting application workshops to prepare applicants to apply for CHF funding;
- Developing and updating CHF policies and procedures to ensure State Contractors/Sub recipient's compliance with HUD and State requirements; and

- Conducting program implementation workshops to ensure that State Contractors/Sub recipients are aware of HUD and State program requirements; and
- Developing materials to ensure State Contractors/Sub recipients compliance with HUD regulations and requirements, such as the following:
 - Eligibility and Documentation Forms;
 - Contract Templates; and,
 - Monitoring Tools.

F. CHF and the Entitlement Communities

ESG Entitlement Communities (City of Pawtucket, Providence and Woonsocket) maintain full responsibility for compliance with HUD Rules and Regulations for projects funded with their ESG entitlement funds including: contracting, reporting, program administration, financial management; training, monitoring and ensuring that ESG Entitlement contractors/sub recipients are aware of HUD and ESG entitlement rules and responsibilities. ESG Entitlement Cities may adopt policies and procedures developed by the State and may make further revisions and/or modifications to CHF developed materials (including forms, contracts, monitoring and training tools) to meet local ESG needs.

II. CHF Program Eligibility

A. Eligible Applicants

All units of general local government and non-profit organizations that provide services to the homeless are eligible to apply for CHF funds. Private non-profit organizations must have a 501(c) 3 certification and be registered in the State of Rhode Island as a charitable organization. If the sub-recipient is a unit of general purpose local government, its ESG funds cannot be used to replace funds the local government provided for street outreach and emergency shelter services during the immediately preceding 12-month period, unless HUD determines that the unit of general purpose local government is in a severe financial deficit.

In addition to meeting basic eligibility requirements, applicants must meet minimum threshold requirements established by the CHF, which are detailed in the annual Request for Proposal.

CHF eligible applicants are referred to as sub recipients/contractors throughout this policy and procedures manual. Contractors/Sub recipients awarded funds through the CHF may use funds for four program components: street outreach, emergency shelter, rapid re-housing (tenant-based only) and state rental assistance (project-based and tenant based), and HMIS. The four program components and the eligible activities that may be funded under each are set forth in 24 CFR § 576.101 through 576.107. Each of these components are defined and described as follows:

B. Eligible Activities

1. Street Outreach Component

Subject to the general provisions in § 576.100(b), CHF funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. For the purposes of this section, **the term “unsheltered homeless people” means individuals and families who qualify as homeless under paragraph (1) (i) of the “homeless” definition under § 576.2.** The eligible costs and requirements for essential services consist of: engagement, case management, emergency health and mental services, transportation, and services for special populations. **CHF funds may be used only for these services to the extent that other appropriate funding sources for these services are inaccessible or unavailable within the community.**

2. Emergency Shelter Component

Subject to the general provisions in § 576.100(b), CHF funds may be used for costs of providing essential services to homeless families and individuals in emergency shelters, renovating buildings to be used as emergency shelter for homeless families and individuals, and operating emergency shelters. An emergency shelter is any facility whose primary purpose 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.

- a) **Essential Services** -CHF funds may be used to provide essential services to individuals and families who are in an emergency shelter. Essential services, includes the following services: case management; childcare; education services; employment assistance and job training; outpatient health services; legal

services; life skills training, mental health services, substance abuse treatment services and transportation and services for special populations.

- b) **Renovation** - Eligible costs include labor, materials, tools, and other costs for renovation (including major rehabilitation of an emergency shelter or conversion of a building into an emergency shelter). The emergency shelter must be owned by a government entity or private nonprofit organization. CHF funds may only be used for these services to the extent that other appropriate renovation funds are unavailable or inaccessible within the community.
- c) **Shelter Operations** -Eligible costs are the costs of maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, staffing and supplies necessary for the operation of the emergency shelter. Where no appropriate emergency shelter is available for a homeless family or individual, eligible costs may also include a hotel or motel voucher for that family or individual.

3. Rapid Re-Housing and Rental Assistance Component

- a) **Rapid Rehousing** - CHF 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. **This assistance, referred to as rapid re-housing assistance, may be provided to program participants who meet the criteria under paragraph (1) of the “homeless” definition in § 576.2 or who meet the criteria under paragraph (4) of the “homeless” definition and live in an emergency shelter or other place described in paragraph (1) of the “homeless” definition.** The rapid rehousing assistance must be provided in accordance with the housing relocation and stabilization services requirements in § 576.105, the short- and medium-term rental assistance requirements in § 576.106, and the written standards and procedures established under § 576.400. Eligible costs include:
 - (i) Financial Assistance-
 - **Security deposits-** CHF funds may pay for a security deposit that is equal to no more than 1 months’ rent.
 - **Moving costs-**CHF funds may pay for moving costs, such as truck rental or hiring a moving company.
 - **Rent-** CHF funds may be used to pay provide up to 24 months of rental assistance during any three-year period. Project based rental assistance is allowed, provided that the property is not owned by the Sub recipient/Contractor.
 - (ii) Services Costs -Subject to the general restrictions under § 576.103 and § 576.104, CHF funds may be used to pay the costs of providing the following services:
 - **Housing Search and Placement-** Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing.
 - **Housing Stability Case Management-**CHF 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. **This assistance 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.

- **Credit Repair-** CHF funds may pay for credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.

- b) **State Rental Assistance-** The State Rental Assistance Program is designed to help the chronically homeless achieve housing stability. The primary goal is to address the barriers and challenges that cause individuals and families to be chronically homeless, while also working to stabilize program participants in housing through the provision of wrap around services after the family or individual obtains housing. The State Rental Assistance Program covers the same eligible costs as the Rapid Rehousing program.

4. HMIS Component

CHF funds may be used to contract with a provider of HMIS services, and to support sub recipients cost of using HMIS to input and manage data associated with program sub recipients. Activities funded under this section must comply with HUD's standards on participation, data collection and reporting under a local HMIS. Each of these costs are described below:

a) **HMIS Lead Eligible Costs**

The sub recipient may use CHF funds to pay the costs of contributing data to the HMIS designated by the Continuum of Care for the area, including the costs of:

- Purchasing or leasing computer hardware;
- Purchasing software or software licenses;
- Purchasing or leasing equipment, including telephones, fax machines, and furniture;
- Obtaining technical support;
- Leasing office space;
- Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS;
- Paying salaries for operating HMIS, including:
 - Completing data entry;
 - Monitoring and reviewing data quality;
 - Completing data analysis;
 - Reporting to the HMIS Lead;
 - Training staff on using the HMIS or comparable database; and
 - Implementing and complying with HMIS requirements;
- Paying costs of staff to travel to and attend HUD-sponsored and HUD approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act;
- Paying staff travel costs to conduct intake; and
- Paying participation fees charged by the HMIS Lead, if the sub recipient is not the HMIS Lead. The HMIS Lead is the entity designated by the Continuum of Care to operate the area's HMIS.

b) Other Sub-recipient's HMIS Eligible Costs

- (i) Paying salaries for HMIS tasks relating to:
 - Completing data entry;
 - Monitoring and reviewing data quality;
 - Completing data analysis;
 - Training staff on using the HMIS or comparable database; and
 - Implementing and complying with HMIS requirements;
 - Purchasing or leasing computer hardware, software and/or software licenses.

- (ii) If the sub recipient is a victim services provider or a legal services provider, it may use ESG funds to establish and operate a comparable database that collects sub recipient-level data over time (i.e., longitudinal data) and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must not be entered directly into or provided to an HMIS.

c) General restrictions

Activities funded under this section must comply with HUD's standards on participation, data collection, and reporting under a local HMIS.

5. Ineligible Activities and Assistance

Ineligible activities that cannot be funded with CHF include, but are not exclusive to:

- replacement of existing mainstream resources;
- payments made directly to program participants;
- Mortgage assistance for program participants;
- payment of rent for eligible individuals or families for the same period and for the same cost types being assisted through any other federal, state, or local housing subsidy program;
- Rental arrear payments;
- Utility arrear payments;
- payments on credit card bills or other consumer debt, including child support or garnishments;
- provision of cash assistance;
- Bad debts/late fees;
- Depreciation;
- Rental assistance longer than 24 months;
- Payment of credit arrears (credit cards, loans, etc.);
- payment of costs of discharge planning programs in mainstream institutions such as hospitals, nursing homes, jails, or prisons; **and**
- payment for religious activities (**Note:** While organizations that are religious or faith-based are eligible to receive CHF funds, religious activities must be conducted separately, in time and location, from CHF-funded activities and participation must be voluntary for program participants).

6. Eligible Program Participants

Individuals and families who meet HUD’s definition of Homeless (as defined by HUD Homelessness Categories 1-4) are eligible to receive services through the Consolidated Homeless Fund (CHF). Generally, these include individuals and families who are:

- Category 1: Literally Homeless (living on the street or in emergency shelter)
- Category 2: Imminently Homeless (within 14 days)
- Category 3: Unaccompanied youth/families who meet other Federal homeless definition (must also meet additional criteria for HUD, similar to 2)
- Category 4: Fleeing/attempting to flee Domestic Violence

The following table identifies the programs for which program participants are generally eligible.

Program Participant Eligibility by Program Type				
Program	Category 1	Category 2	Category 3	Category 4
Street Outreach	X			
Emergency Shelter	X	X	X	X
Rapid Rehousing	X			X
State Rental Assistance	X			X

The eligibility process includes an initial phone or in person screening to determine whether the applicant meets one of HUD’s categorical definitions of homeless.

Eligibility determinations must be documented in client files preferably through third-party documentation. Sub-recipients/Contractors are required to participate in and comply with the RI Continuum of Care’s Coordinated Entry Process including utilizing standard COC assessment tools and protocols. Sub recipients may choose to utilize a different intake and assessment system for victims of domestic violence and other crimes where safety is a predominant concern. Within the program types eligible under the Consolidated Homeless Fund, there shall be additional participant eligibility criteria and recordkeeping requirements (**see Section IV: Eligible Activity Specific Standards**).

7. Determinations of Ineligibility

A record must be kept for determinations of ineligibility for each individual and family determined to be ineligible for CHF funds, and the reason for the determination must be documented.

III. CHF Administrative Requirements

A. Written Standards for Providing ESG Assistance 576.400

Sub-recipients must adhere to all CHF administrative requirements and program specific standards referenced in this policies and procedures manual when providing CHF assistance and must consistently apply the program specific standards to all program participants. **In addition, Sub-recipients are required to create and maintain an operation manual that details CHF program and contract expectations for staff and volunteers. The operations manual should include program specific rules, eligibility requirements, expectations and outcomes as outlined in this manual.**

B. Participation in the Coordinated Entry System

In compliance with 24 CFR 576.400 (d), all CHF/ESG providers within the RI CoC service area must coordinate and integrate to the maximum extent practicable, CHF/ESG funded activities with other programs targeted to people experiencing homelessness in RI CoC area to provide a strategic, community-wide system to prevent and end homelessness. The RI Statewide Coordinated Entry System is designed to:

- Allow anyone who needs assistance to know where to get help, to be assessed in a standard and consistent way, and to connect with the housing/services that best meet their needs;
- Ensure clarity, transparency, consistency and accountability for homeless clients, referral sources and homeless service providers throughout the assessment and referral process;
- Facilitate exits from homelessness to stable housing in the most rapid manner possible given available resources;
- Ensure that clients gain access as efficiently and effectively as possible to the type of intervention most appropriate to their immediate and long-term housing needs;
- Ensure that homelessness prevention, diversion, and housing services are easily accessed by individuals and families seeking housing or services; and
- Ensure that people who have been homeless the longest and/or are the most vulnerable have priority access to scarce permanent supportive housing resources.

CHF Sub-recipients/Contractors will be required to cooperate with the RI Coordinated Entry System, by first **establishing a staff member as a point of contact** for the RI Coordinated Entry System. The Sub-recipient contact person should be in a position that is familiar with organizational resources and up to date on current organizational capacity to accept and serve clients. This contact should also be able to provide information to the RI Coordinated Entry System on what current programs and resources are available to homeless households seeking assistance. The Sub-recipient point of contact will also be responsible for ensuring the Sub-recipient's compliance with the following:

1. Ensuring that written standards for client eligibility and screening are established for each CHF project for which the Sub-recipient has received funding.
2. Communicating with the CoC regarding Sub-recipient open shelter beds and Rapid Rehousing and State Rental Assistance units available.
3. Ensuring that the sub-recipient organization is using CoC standardized assessment tools (VI-SPDAT and SPDAT) and forms for all its CHF funded projects.
4. Supporting the sub-recipient's participation in the Coordinated Entry System by ensuring that the

appropriate staff person (s) from the sub-recipient organization is participating (in person or via conference call) in bi-weekly case conferencing for families, Veterans and Chronically homeless individuals; and

5. Ensuring that at least one staff member from the sub-recipient organization attend training sessions provided or hosted by the Coordinated Entry System and that the training information materials are shared with all staff working on CHF Sub-recipient funded project (s).

C. Scope of Work Changes

All scope of work/work plan changes require CHF approval. Submit a Work Plan Amendment Request form electronically to your CHF Project Officer. At the discretion of the CHF, additional information may be required. Amendments may be requested by the sub-recipient/contractor and are required when there is a shift in program delivery, the actual number of households/people served greatly exceeds expectations; or if there are unexpected changes in demographics, such as a larger subpopulation than projected, is requesting and needing resources.

D. Reporting Requirements

1. **CHF Reporting** -The Sub-recipient/Contractor is required to submit Consolidated Homeless Fund Quarterly Progress Reports, using forms provided in Attachment 4. Reports shall be due on the following dates:
 - October 15th (for the period of July 1 – September 30th)
 - January 15th (for the period of October 1st – December 31st)
 - April 15th (for the period of January 1st – March 31st)
 - July 15th (for the period of April1st – June 30th)

All reports shall be submitted to the respective State and/or ESG Entitlement City Program Representative.

2. **CAPER Reporting** – CHF Sub-recipients are required to submit an ESG CAPER at the end of the program year. These reports must be generated by the sub-recipient agency from HMIS.

The Sub-recipient/Contractor will comply with any additional reporting requirements by the Federal Government or the State of Rhode Island, and the CHF.

E. CHF Forms

CHF provides most of the forms necessary for carrying out this grant. CHF forms are created to fit the needs of the administration process and, most importantly, to fit the reporting requirements from HUD. It is important for Sub recipients to cooperate with the use of the forms provided, understanding that they are purposeful and necessary. Program forms and reference documents are available for download from the CHF web site. Sub-recipient's may use these standard forms or acceptable equivalents when administering its ESG funded program. Any alternate form must collect all data requested on the standard form. CHF encourages the use of the standard forms for consistency and ease of monitoring and compliance.

F. Homeless Participation 24 CFR 576.405

Sub-recipients must provide for the participation of not less than one homeless individual or formerly homeless individual on board of directors or other equivalent policy-making entity of the sub-recipient, to the extent the extent that the entity considers and makes policies and decisions regarding any facilities, services, or other assistance that receive funding under CHF. To the maximum extent practicable, the sub-recipient must involve homeless individuals and families in constructing, renovating, maintaining and operating facilities assisted under CHF. This involvement may include employment of volunteer services.

G. Case Management Standards

CHF Sub-recipients/Contractors will provide case management services to clients, or insure that clients have access to these services through another agency, while ensuring the following is accomplished:

- CHF Sub-recipients/Contractors will develop and implement a set of written policies and procedures that clearly delineate the provision of case management services to include what specific services are to be provided, how they are to be provided, and by whom.
- As a part of case management services, CHF Contractors/Sub-recipients will ensure that a housing and services plan is completed for all program participants. The plan is intended to be a guide for both the program participant and the Sub recipient/Contractor. It should focus on obtaining or maintaining housing with defined goals, outcomes and timelines. The plan should also identify needed community resources, referrals to partnering agencies especially for mainstream benefits, budget education and tenant education.
- Information about how to access all case management services will be posted conspicuously in each facility. Case management services shall include, but are not limited to the following:
 - Conducting initial evaluations to determine client eligibility for services;
 - Assisting clients to obtain Federal, State and local benefits;
 - Monitoring and evaluating program participant progress;
 - Providing information and referrals to other providers; and
 - Developing an individualized service plan, including a path to permanent housing stability.
- CHF Sub-recipients/Contractors are required to post information designed to help resident's access job training and employment opportunities, health, mental health and substance abuse treatment, and food/soup kitchen resources.
- CHF Sub-recipients are required to maintain confidential records to document services and referrals provided to each resident.
- CHF Contractors/Sub recipients are required to monitor the delivery of case management services provided by their partner agencies to ensure compliance with CHF case management requirements.
- CHF Sub-recipients/Contractors will make available to State/CHF Program Representatives and HUD program participants' case management records/files upon request.

H. Coordination Requirements

1. Connecting Program Participants to Mainstream and Other Resources

Sub recipients/Contractors must assist each program participant, as needed, to obtain:

- Appropriate supportive services, including assistance in obtaining permanent housing, medical health treatment, mental health treatment, counseling, supervision, and other services essential for achieving independent living; and
- Other Federal, State, local, and private assistance available to assist the program participant in obtaining housing stability, including:
 - Medicaid (42 CFR chapter IV, subchapter C);
 - Supplemental Nutrition Assistance Program (7 CFR parts 271–283);
 - Women, Infants and Children (WIC) (7 CFR part 246);
 - Federal-State Unemployment Insurance Program (20 CFR parts 601–603, 606, 609, 614–617, 625, 640, 650);
 - Social Security Disability Insurance (SSDI) (20 CFR part 404);
 - Supplemental Security Income (SSI) (20 CFR part 416);
 - Child and Adult Care Food Program (42 U.S.C. 1766(t) (7 CFR part 226));
 - Other assistance available under the programs listed in § 576.400(c).

2. Coordination Among Homeless Assistance Providers

Sub recipients must coordinate and integrate, to the extent possible, their CHF-funded assistance with other programs serving homeless and at-risk of homelessness people within their service area (refer to 24 CFR 576.400) to prevent and end homelessness for that area. These programs include:

- Shelter Plus Care Program (24 CFR part 582);
- Supportive Housing Program (24 CFR part 583);
- Section 8 Moderate Rehabilitation Program for Single Room Occupancy Program for Homeless Individuals (24 CFR part 882);
- HUD—Veterans Affairs Supportive Housing (HUD–VASH) (division K, title II, Consolidated Appropriations Act, 2008, Pub. L. 110–161 (2007), 73 FR 25026 (May 6, 2008));
- Education for Homeless Children and Youth Grants for State and Local Activities (title VII–B of the McKinney Vento Homeless Assistance Act (42 U.S.C. 11431 *et seq.*));
- Grants for the Benefit of Homeless Individuals (section 506 of the Public Health Services Act (42 U.S.C. 290aa–5));
- Healthcare for the Homeless (42 CFR part 51c);
- Programs for Runaway and Homeless Youth (Runaway and Homeless Youth Act (42 U.S.C. 5701 *et seq.*));
- Projects for Assistance in Transition from Homelessness (part C of title V of the Public Health Service Act (42 U.S.C. 290cc–21 *et seq.*));
- Services in Supportive Housing Grants (section 520A of the Public Health Service Act); Emergency Food and Shelter Program (title III of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11331 *et seq.*));

- Transitional Housing Assistance Grants for Victims of Sexual Assault, Domestic Violence, Dating Violence, and Stalking Program (section 40299 of the Violent Crime Control and Law Enforcement Act (42 U.S.C. 13975));
- Homeless Veterans Reintegration Program (section 5(a)(1)) of the Homeless Veterans Comprehensive Assistance Act (38 U.S.C. 2021);
- Domiciliary Care for Homeless Veterans Program (38 U.S.C. 2043);
- VA Homeless Providers Grant and Per Diem Program (38 CFR part 61);
- Health Care for Homeless Veterans Program (38 U.S.C. 2031);
- Homeless Veterans Dental Program (38 U.S.C. 2062);
- Supportive Services for Veteran Families Program (38 CFR part 62); and
- Veteran Justice Outreach Initiative (38 U.S.C. 2031).

3. Coordination with Housing Providers

The Contractor/Sub recipient must coordinate and integrate, to the maximum extent practicable, CHF funded activities with mainstream housing, health, social services, employment, education, and youth programs for which families and individuals at risk of homelessness and homeless individuals and families may be eligible.

Examples of these programs include:

- Public housing programs assisted under section 9 of the U.S. Housing Act of 1937 (42 U.S.C. 1437g) (24 CFR parts 905, 968, and 990);
- Housing programs receiving tenant-based or project-based assistance under section 8 of the U.S. Housing Act of 1937 (42 U.S.C. 1437f) (respectively 24 CFR parts 982 and 983);
- Supportive Housing for Persons with Disabilities (Section 811) (24 CFR part 891);
- HOME Investment Partnerships Program (24 CFR part 92);
- Temporary Assistance for Needy Families (TANF) (45 CFR parts 260–265);
- Health Center Program (42 CFR part 51c);
- State Children’s Health Insurance Program (42 CFR part 457);
- Head Start (45 CFR chapter XIII, subchapter B);
- Mental Health and Substance Abuse Block Grants (45 CFR part 96); and
- Services funded under the Workforce Investment Act (29 U.S.C. 2801 *et seq.*).

I. Affirmative Outreach

Sub-recipients/Contractors must make known that the use of the facilities, assistance, and services are available to all on a nondiscriminatory basis (24 CFR 576.407). If it is unlikely that the procedures that sub-recipient intends to use to make known the availability of facilities, assistance, and services will reach persons of any particular race, color, religion, sex, age, national origin, familial status, or disability who may qualify for those facilities and services, sub-recipients must establish additional procedures that ensure that those persons are made aware of the facilities and services, sub-recipients must establish additional procedures that ensure that persons are made aware of the facilities, assistance, and services. Sub-recipients must take appropriate steps to ensure that effective communication with persons with disabilities including, but not limited to, adopting procedures that will make available to interested persons information concerning the location of assistance, services and facilities that are accessible to persons with disabilities. Consistent with Title VI and Executive Order 13166, sub-recipients are also required to take reasonable steps to ensure meaningful access to programs and activities for Limited English Proficiency (LEP) Persons.

J. Non-Discrimination and Equal Opportunity 24 CFR 576.07

CHF Contractors/Sub-recipients are required to comply with all state and federal statutes relating to non-discrimination. Any of the following actions based on race, color, national origin, religion, gender, familial status, gender identity or handicap status are not permitted:

- Refuse to rent housing or provide services;
- Make housing or services unavailable;
- Deny a dwelling or service;
- Set different terms, conditions, or privileges for rental of a dwelling or obtaining services;
- Provide different housing services or facilities or different services;
- Falsely deny that housing is available for inspection or rental or that services are available; and
- Deny anyone access to a facility or service.

K. Section 504 of the Rehabilitation Act of 1973

Sub-recipients must comply with Section 504 of the Rehabilitation Act of 1973 (The Act). Pursuant to the requirement of The Act, sub-recipients must ensure that no otherwise qualified disabled person shall, solely by reason of their disability be excluded from the participation in, be denied the benefits of, or be subject to discrimination, including discrimination in employment, in any program or activity that receives or benefits from Federal financial assistance. The sub-recipient must also ensure that requirements of The Act shall be included in the agreements with and be binding on all its sub recipients, contractors, and subcontractors, assignees or successors.

L. Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity

On February 3, 2012, HUD published a final rule in the Federal Register entitled Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity. This rule applies to all McKinney-Vento funded housing programs, as well as to other housing assisted or insured by HUD. This rule prohibits considering a person's marital status, sexual orientation, or gender identity (a person's internal sense of being male or female) in making homeless housing assistance available. The rule can be found in the Federal Register of February 3, 2012, p 5662. It includes provisions that:

- Require entities assisted by HUD to make housing available without regard to actual or perceived sexual orientation, gender identity, or marital status.
- Clarify that the definition of "family" and "household", which identifies who is eligible for HUD's core programs, includes persons regardless of actual or perceived sexual orientation, gender identity, or marital status; and
- Prohibit HUD-assisted entities from inquiring about an applicant's or occupant's sexual orientation or gender identity for determining eligibility or otherwise making housing available.

M. Organizational Conflicts of Interest

In accordance with 24 CFR 576.404, the provision of any type or amount of CHF assistance may not be conditioned on an individual's or family's acceptance or occupancy of emergency shelter or housing owned by the sub-recipient, or a subsidiary of the sub-recipient. CHF Federal Funds (ESG Funds) may not be used to pay rent for program participants occupying units owned by a CHF Sub-recipient/Contractor.

N. Drug-Free Workplace

The Sub recipient/Contractor agrees to comply with the requirements of the Governor's Executive Order No. 89-14 and the Federal Anti-Drug Abuse Act of 1988. The Contractor hereby agrees to abide by Exhibit 8 – the State's Drug Free Workplace Policy, and in accordance therewith has executed Exhibit 9 – Drug-Free Workplace Policy Contractor Certificate of Compliance. Furthermore, the Contractor agrees to submit to the OHCD any report of forms which may from time to time be required to determine the Contractor's compliance with this policy. The Contractor acknowledges that a violation of the Drug-Free Workplace Policy may, at the Department's option; result in termination of this Agreement.

O. Faith-Based Organizations (24 CFR 576.406)

Neither the federal government nor a state or local government receiving funds under a HUD program or activity shall discriminate against an organization on the basis of the organization's religious character or affiliation. HUD supports the participation of faith-based organizations in its programs. Faith-based activities are eligible to receive CHF funds per 576.406 under the following conditions:

- Organizations that are religious or faith-based are eligible, on the same basis as any other organization, to receive CHF funds. Neither the Federal Government nor a State or local government receiving funds under CHF shall discriminate against an organization on the basis of the organization's religious character or affiliation.
- Organizations that are directly funded under the CHF program may not engage in inherently religious activities, such as worship, religious instruction, or proselytization as part of the programs or services funded under CHF. If an organization conducts these activities, the activities must be offered separately, in time or location, from the programs or services funded under CHF, and participation must be voluntary for program participants.
- Any religious organization that receives CHF funds retains its independence from Federal, State, and local governments, and may continue to carry out its mission, including the definition, practice, and expression of its religious beliefs, provided that the religious organization does not use direct CHF funds to support any inherently religious activities, such as worship, religious instruction, or proselytization. Among other things, faith-based organizations may use space in their facilities to provide ESG-funded services, without removing religious art, icons, scriptures, or other religious symbols. In addition, an ESG- funded religious organization retains its authority over its internal governance, and the organization may retain religious terms in its organization's name, select its board members on a religious basis, and include religious references in its organization's mission statements and other governing documents.

- An organization that receives CHF funds shall not, in providing CHF assistance, discriminate against a program participant or prospective program participant on the basis of religion or religious belief. CHF funds may not be used for the rehabilitation of structures to the extent that those structures are used for inherently religious activities. Where a structure is used for both eligible and inherently religious activities, CHF funds may not exceed the cost of those portions of the rehabilitation that are attributable to eligible activities in accordance with the cost accounting requirements applicable to CHF funds. Sanctuaries, chapels, or other rooms that an CHF-funded religious congregation uses as its principal place of worship, however, are ineligible for funded improvements under the program.

P. Lobbying Requirements

No federally appropriated funds will be paid or will be paid, by or on behalf of the sub-recipient, to any person for influencing or attempting to influence an officer or employee of any agency, a member of Congress in connection with the awarding of any federal contract, the making of any federal grant, the making of any federal loan, and entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any federal contract, grant, loan, or cooperative agreement. Sub-recipients shall require the language of this certification in the award documents for all sub-grantees at all tiers.

Q. Termination

In accordance with 24 CFR 576.402, If a program participant violates program requirements, the Sub-recipient may terminate the assistance in accordance with a formal process established by the Sub-recipient that recognizes the rights of individuals affected. The Sub-recipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program Sub recipient's assistance is terminated only in the most severe cases.

For program participants receiving rental assistance or housing relocation and stabilization services, the following additional steps must be taken when terminating assistance:

- Written notice to the program Sub-recipient containing a clear statement of the reasons for termination;
- A review of the decision, in which the program Sub-recipient is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
- Prompt written notice of the final decision to the program Sub-recipient.

Termination under this section does not bar the Sub-recipient from providing further assistance at a later date to the same family or individual.

R. Grievance Procedure

Client rights and responsibilities will include a mechanism for residents to present suggestions or grievances. The grievance procedure shall include provisions for appeal, limited to the provisions of these Program Assurances. The External Review Committee (ERC) will accept and review grievances from consumers regarding specific programs. Depending on the outcome, recommendations for corrective actions may be transmitted to providers and their funding agency (ies). A grievance is a formal complaint or allegation against a provider agency, which is covered by the Office of Homelessness' Shelter Assurances, and/or any staff members and/or volunteer associated with such a provider agency.

The membership of the External Review Committee shall be equally weighted:

Categories

- 2 Representatives of persons experiencing homelessness/formerly homeless
- 2 Representatives of homeless providers/agencies
- 1 Representative of a State agency* (with alternate)

*The State agency representative will serve as Chair of the committee.

The Chair of the committee will be appointed by the Housing Resources Commission Chair. Members of the committee will be solicited through an open process and ultimately selected/appointed by the Chair of the ERC. The Chair and all members of the ERC will serve at the discretion of the HRC Chair. The ERC will, however, operate and development/implement recommendations independent of the HRC and its Chair.

No member of the ERC may participate in the process if an actual or perceived conflict exists. An example may include any person who has a professional/personal relationship with an individual submitting the complaint and/or the agency (or staff of the agency) against whom the complaint is filed. No meeting can be held without at least one representative in each of the above categories. On issues requiring a vote, each category will be given one vote. Decisions will be made by simple majority.

Process Outline:

Initial: There should be an attempt to resolve issues at the agency level (internal process) prior to initiating a formal grievance with the ERC. Agencies will be required to develop specific procedures to follow in efforts to resolve matters, including key contact information when applicable. The State will provide template documents (including a standardized grievance form) for such instances. Guidelines should be readily available to clients and known to program staff. Agencies typically resolve informal issues on a daily basis. Generally, if a matter has been formalized through a written complaint, the response/resolution should also be formalized.

Step #1: Any person wishing to file a grievance must complete the standardized Grievance Form and submit such to the External Review Committee c/o Mary Bray, Housing Resources Commission, One Capitol Hill - 3rd Floor, Providence, R.I. 02908. Individual needing assistance in completing this form and throughout the process may consult homeless advocacy organization (Point of contact: RI Coalition for the Homeless).

Step #2: Grievances will be forwarded to the provider agency for response. Grievances will also immediately be forwarded to ERC members for consideration. Written agency responses will be required within two weeks. An agency's response may include actions the agency has taken to correct the issue. An agency's response, or lack of response within two weeks, will be provided to the ERC members.

Step #3: Grievances and Provider responses will be forwarded to the ERC for consideration. The ERC will determine if a hearing is necessary. This conclusion will be made based upon an analysis of the written documentation and may be voted upon using electronic means (phone, email).

Step #4: If no hearing is necessary, the conclusions of the ERC will be communicated to the party filing the grievance and the subject agency. Within 30 days, the case may be re-opened by the ERC if either party has been unable to comply with the recommendations of the committee. In such cases, a hearing may be scheduled. If a hearing is necessary, it will be scheduled so that all parties (person filing grievance, provider agency, ERC membership) can participate. Once again, individuals needing assistance in this process may consult homeless

advocacy organization (Point of contact: RI Coalition for the Homeless).

Step #5: When necessary, a hearing will be conducted. Parties may be heard separately or a joint hearing may be held depending upon the specific circumstances. The person filing the Grievance Form will be heard first if possible. All witnesses (participants, including advocates assisting the person filing the grievance) in the hearing, process must be disclosed in advance of the meeting.

Step #6: The ERC will determine the response to the grievance filed. ERC response will be forwarded to the person filing the grievance, the provider agency and any funder determined appropriate.

Note: Persons filing grievances for multiple reasons, related to the same program - during the same period of time, should do so on a single form. All grievances should be filed within the ERC within one month of the conclusion of the internal (agency) process for grievance resolution. Persons may file a grievance while they are participates in or within 6 months of exiting a specific program (in accordance with above). The ERC encourages individuals to attempt to resolve issues with the agency's internal process prior to submitting the complaint. The ERC will not consider the same incident twice. If the ERC feels this process is being used improperly, it may skip Steps 2-5. The decisions/recommendations of the ERC are final. Failure to provide essential information and/or generally pursue a grievance may result in the closure of the complaint by the ERC.

The committee will establish a monthly meeting schedule (to be cancelled if there are no items to address in that month). The committee will attempt to resolve issues within 60 days of receipt. Participants in this process may not unnecessarily delay the process.

Staffing:

Primary Staff:	Mary Bray, Housing Resources Commission
Responsibilities:	Accept Grievance Forms Accept Provider Response Forms Establishing Meetings (notices - materials, dates, times, locations) Meeting Minutes ERC Communications (to be signed by Chair)

Limitations:

The ERC is an independent, advisory group, which can make recommendations to funders and provider agencies. Because shelter/service providers are independent agencies, the ERC cannot necessarily dictate changes to programs/policies. Funding agencies may, however, adjust current and/or future funding based upon the results of hearings, recommendations of the ERC and the provider's policies/practices. Agencies are permitted to develop and implement their specific program procedures/policies. The ERC is not intended to review disagreements with these program policies. It is intended to review situations in which an individual was treated unfairly, not in accordance with agency contract agreements.

S. HMIS Requirements

All CHF Sub recipients/Contractors (with the exception of Domestic Violence Providers) are required to report client-level data in the Homeless Management Information System (HMIS). The Contractor is required to comply with the most recent HMIS technical and data standards published by HUD. These data standards are available

from the State's Homeless Management Information System Contractor "**The Rhode Island Coalition for the Homeless**".

Sub recipients/Contractors are also required to send licensed HMIS users to at least one quarterly HMIS User Training per year. Sub recipient/Contractor's HMIS Administrators must also attend at least one HMIS training appropriate to their HMIS responsibilities per year. If the Contractor has greater than five licensed HMIS users, select staff may attend, provided they distribute training materials to the users who could not attend. The Contractor will comply with any additional reporting requirements by the Federal Government or the State of Rhode Island, and the OHCD.

Domestic Violence Providers Participation in Comparable Database are required to report client-level data, such as the number of persons served and their demographic information, not in HMIS, but rather in a comparable client-level database for agencies serving victims of domestic violence. The Contractor is also required to comply with the most recent HMIS technical and data standards published by HUD. Contractors are required to review this notice and ensure these revised data standards are implemented in their comparable client level database, where applicable.

T. Client Confidentiality and Privacy Policies

Sub-recipients will not divulge personal identifying information of a program participant of the CHF program without the consent from the client. In addition, sub-recipients will not divulge information pertaining to any individual or family domestic violence shelter or treatment facilities. Each sub- recipient must incorporate into their policies and procedures a process that will ensure the confidentiality of program participants' identifying information; records pertaining to any individual or family provided family violence prevention; and treatment services offered under any project assisted with ESG funds. Furthermore, the address or location of any shelter for victims of domestic violence assisted under ESG will be anonymous except upon written authorization from the person or persons responsible for the operation of the shelter for this information to be made public.

IV. CHF Eligible Activity Specific Standards

A. Street Outreach

1. Eligibility

Sub-recipients are required to reach out to unsheltered homeless individuals and/or families (those who meet the definition of homeless under category 1 of the homeless definition in 24 CFR 576.2) whose primary nighttime residence is a public or private place not meant for human habitation. Based on need and assessment, qualifying individuals and/or families will be offered essential services beyond emergency health and other crisis intervention assistance that may include case management, transportation, and housing stabilization. Emergency health services, including mental health, can be funded with CHF funding only to the documented extent that other non-CHF funded appropriate health services are inaccessible or unavailable within the service area.

2. Initial Assessment and Prioritization

It is recommended that preference be given to those special populations who are most vulnerable to being harmed by living in unsafe and unprotected places, i.e. victims of domestic and other forms of violence, youth, families with children, disabled, elderly, etc. CHF Sub-recipients/Contractors will utilize the VI/SPDAT/SPDAT to assess program participants' eligibility (in accordance with the CoC Policies and Procedures for The Statewide Coordinated Entry System for Homeless Services and the intervention/essential service necessary to resolve homelessness. Engagement activities must include an initial assessment of needs and eligibility to prioritize the type and source of assistance required with safety and urgent health needs being the highest priority.

3. Service Provision

Based on need and assessment, qualifying individuals and/or families must be offered essential services beyond emergency health and other crisis intervention assistance that include case management, transportation, and housing stabilization, if needed. Whenever feasible, rapid re-housing will be a priority over the provision or referral to emergency shelter or transitional housing.

4. Minimum Period of Use

The sub recipient must provide services to homeless individuals and families for at least the period during which CHF funds are provided.

5. Performance Standards

Sub-recipients will be evaluated using the following measures:

- % increase in the number of contacts with unduplicated individuals made during street outreach (source: HMIS);
- A minimum of 70% of all leavers will exit to permanent housing (source: HMIS);
- No more than 30 % of all leavers will exit to shelter or other temporary destinations (source: HMIS);
- 25% or more of all adult stayers will gain or increase all income from entry to exit (source: HMIS);
- 25% or more of all adult stayers will gain or increase non-cash benefits (health, insurance, food stamps-source: HMIS) etc.

B. Emergency Shelter Operations

1. Admission & Eligibility

Sub-recipient/Contractors are required to have standardized screening and intake criteria in writing for determining eligibility for admission to emergency shelter. The criteria must be in compliance with Fair Housing Law and cannot force involuntary family separation by denying family admission based on the age of a child less than 18 years. The admission process requires an initial assessment to determine the homeless status of the applicant based on HUD's four categorical definitions of homeless (24 CFR 576.2) and must be conducted in accordance with the RI Continuum of Care's Statewide Coordinated Care Entry System for Homeless Services Policies and Procedures Manual.

2. Initial Assessment and Prioritization

CHF Sub-recipients/Contractors will utilize the VI/SPDAT/SPDAT to assess program participants' eligibility (in accordance with the CoC Policies and Procedures for The Statewide Coordinated Entry System for Homeless Services) and the intervention necessary to resolve homelessness and their placement on a priority list for housing.

3. Diversion from Shelter

Based on screening results, individuals and families should be diverted when appropriate to the most stable housing available including supportive or subsidized permanent housing using the Housing First or Rapid Re-housing service models.

4. Cooperating with the Statewide Coordinated Entry System for Homeless Services

CHF Sub-recipient shelters will accept referrals from the COC Coordinating Entity for vacant shelter beds. Emergency shelter programs receiving a referral from the coordinated entity for a vacant bed must hold that vacancy on behalf of the referred homeless household until at least 5:00 pm. Emergency Shelters may only decline households found eligible and referred by the Coordinating Entity under limited circumstances, such as there is no actual vacancy available, the household presents with more people than referred by the Coordinating Entity, or based on the individual project policies and procedures the Emergency Shelter has determined that the household cannot be safely accommodated. Sub-recipient shelters will provide the CoC Coordinating Entity with information regarding their shelter's policies and procedures.

5. Essential Services Provision

Emergency shelter program participants must have access to essential services either through direct service delivery by the sub recipient and/or provision of information and referral to other service providers. Essential services include: case management; child care; education services, employment assistance and job training; outpatient health services; legal services; life skills training; mental health services; substance abuse treatment services; transportation; services for special populations and mainstream income and health benefits where appropriate.

Sub-recipients/Contractors are required to have a written standard assessment process and tool(s) that are applied to all eligible recipients of shelter essential services in accordance with The Rhode Island Continuum of Care Statewide Coordinated Entry System for Homeless Services Policies and Procedures. Provision of services should then be provided based on client need.

6. Length of Stay and Discharge

Limitations on individual and family shelter stays, if any, must be identified in writing in the CHF Sub-recipient's policies and procedures governing shelter operations. The CHF encourages providers to limit shelter stays, so that individuals and families are in shelter for no longer than the time that is needed to help households regain permanent housing. Facilities and programs will refer all clients who are unable to be served to other agencies.

7. Shelter and Housing Standards (CFR 576.403)

Sub recipients/Contractors are required to adhere to the minimum Shelter and Housing Standards listed below and included in "Statewide Emergency Homeless Shelter Standards" (see Section 9.4) developed by the Homeless Input Committee of the Housing Resources Commission Office of Homelessness & Emergency Assistance:

- Structure and materials. The building must be structurally sound to protect residents from the elements and not pose any threat to health and safety of the residents.
- Access. The building must be accessible in accordance with Section 504 of the Rehabilitation Act (29 U.S.C. 794) and implementing regulations at 24 CFR part 8; the Fair Housing Act (42 U.S.C. 3601 et seq.) and implementing regulations at 24 CFR part 100; and Title II of the Americans with Disabilities Act (42 U.S.C. 12131 et seq.) and 28 CFR part 35; where applicable.
- Space and security. Except where the building is intended for day use only, the building must provide each program participant in the building with an acceptable place to sleep and adequate space and security for themselves and their belongings.
- Interior air quality. Each room or space within the building must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.
- Water supply. The building's water supply must be free of contamination.
- Sanitary facilities. Each program participant in the building must have access to sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.
- Thermal environment. The building must have any necessary heating/cooling facilities in proper operating condition.
- Illumination and electricity. The building must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the building.
- Food preparation. Food preparation areas, if any, must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.
- Sanitary conditions. The building must be maintained in a sanitary condition.
- Fire safety. There must be at least one working smoke detector in each occupied unit of the building. Where possible, smoke detectors must be located near sleeping areas. The fire alarm system must be designed for hearing-impaired residents. All public areas of the shelter must have at least one working

smoke detector. There must also be a second means of exiting the building in the event of fire or other emergency.

8. Additional RI Statewide Emergency Homeless Shelter Standards

The following assurances have been based upon “Statewide Emergency Homeless Shelter Standards” developed by the Homeless Input Committee of the Housing Resources Commission Office of Homelessness & Emergency Assistance. They have been adapted to include all homeless shelters and services funded through the Consolidated Homeless Fund. All facilities and programs funded by the State of Rhode Island must provide humane care that preserves individual dignity of every man, woman and child who receives shelter and/or services. Contractors will enable clients to have access to basic needs and reasonable security. Every person has the right to:

1. Be treated with dignity and compassion;
2. Have access to food, shelter, and other resources for survival.

The following additional RI Statewide Emergency Homeless Shelter Standards assures that each program participant is treated with dignity and compassion and has access to food, shelter, and other resources for survival:

- Food and Nutrition- Homeless service entities providing food services will comply with all applicable laws and regulations. Facilities will develop and implement guidelines for safe food storage, preparation, and clean up of all food preparation areas. Facilities should ensure that meals provide adequate nutrition, following the current USDA Food Pyramid.
- Health and Safety- The facility shall comply with applicable local/state zoning, building, electrical, plumbing, fire, environmental, health and safety codes. The facility shall utilize spaces in which furniture, appliances, heating/cooling units, walls, floors, roof, windows, lighting and plumbing are safe and fit for their intended purpose. The facility will be clean and in good repair. Facilities will provide an environment free from all pests.
- Shelter Beds - Shelters will provide a bed, mat or crib for each guest except in extenuating “overflow” conditions and based on size and/or type of shelter. The shelter will provide and maintain safe sleeping areas. All beds, cots and cribs will meet current safety standards and be in good working condition.
- Restroom Facilities -The shelter will provide and maintain clean and safe restroom facilities to include toilets, sinks and showers/bathtubs. The shelter will make provision for clean linens and towels for each client.
- Emergency Manual -The shelter will provide for safety and security including the development and maintenance of an emergency manual, which outlines:
 - Emergency procedures for disaster and/or violence related evacuation;
 - Accountability for all persons in case of an emergency;
 - Emergency procedures for communicable diseases;
 - Procedures for individual emergencies including health or mental health emergencies;
 - Emergency contacts and phone numbers;
 - Location of utility shutoff sites such as water, electric and gas.

- Regular safety inspections and evacuation drills shall be conducted.
- Opening/ Closing Times - Shelters not operating on a 24-hour basis will create and implement a policy for extension of their operating hours during inclement weather and during designated emergencies including, but not limited to severe weather, natural disasters and other such situations as designated by governmental authorities. **Shelter policies will allow residents who are employed to leave for and return from work without penalty.**
- Staff- Facilities and programs will have a table of organization of all paid staff. There will be written position descriptions for each position type, which includes job responsibilities and qualifications.
- Training - Programs will have sufficient trained staff (either paid or volunteer) on-site and available during all hours in which clients occupy the premises, unless individual secured units are provided. The contractor will provide an ongoing training program for staff either directly or through cooperating agencies. Staff training will include but not be limited to:
 - Program operation
 - Agency operating procedures
 - Emergency procedures as outlined in Section B. above
 - Infection control policy and procedures
 - Non-violent crisis intervention techniques
 - First aid
 - CPR
 - Emergency procedures for medical/psychiatric crises
 - Referral procedures to relevant community resources
 - Other training relevant to the work to be performed
- Ethical Conduct - The contractor will have written standards for ethical conduct of staff in relationship to clients of the program, which include but are not limited to:
 - Confidentiality
 - Respect for clients
 - Prohibition of borrowing and lending of money
 - Prohibition of sexual contact and exploitation
 - Prohibition of drug or alcohol use
- Staff Supervision - The shelter will provide appropriate professional supervision to all paid staff and volunteers on a regular basis. Direct supervision shall be provided for all interns and new staff, either paid or volunteer, with periodic evaluations of their performance.

9. Emergency Preparedness Plans

The Sub-recipient/Contractor is required to maintain an Emergency Preparedness and Management Plan for all programs funded under this agreement. An Emergency Preparedness and Management Plan shall illustrate the policies and procedures for the handling of emergencies including but are not limited to:

- Flooding
- Fire
- Earthquakes
- Blizzards

- Hurricanes
- Tornados
- Power Outages
- Water Outages
- Violence/Bomb Threats

Policies and procedures outlined in the plan may include, but are not limited to:

- Evacuation Routes (including means of transportation)
- Alternative shelter/activity plans
- Staffing Roles and Management (Points of contact, roles and responsibilities)
- Location and distribution plans for emergency reserves of food, water, blankets, flashlights, etc.
- Outreach initiatives for unsheltered persons (when applicable)

10. Drug and Alcohol-Free Facilities

The 1988 Amendment Act requires grantees, Sub-recipients/Contractors under each of the homeless housing programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act, to administer in good faith, a policy designed to ensure that the homeless facility is free from the illegal use, possession or distribution of drugs or alcohol by its beneficiaries.

11. Safety and Accommodations for Special Populations

Sub recipients are required to develop and implement written procedures and communication tools/materials that ensure persons of any particular race, color, ethnicity, religion, sex, sexual identity, age, national origin, familial status, or disability who may qualify for shelter and essential services are aware of and have access to such facilities and assistance.

- a. **Persons with Disabilities**- Reasonable accommodations for persons with disabilities must be available to ensure disabled participants have an equal opportunity to utilize the shelter and receive essential services. Greater levels of accessibility may be required for some shelters in compliance with The Americans with Disabilities Act.
- b. **Limited English Proficiency**-Sub-recipients are also required to have written procedures in place that ensure access to shelter facilities, assistance and services for limited English proficiency (LEP) persons. It is highly recommended that Sub-recipients develop and implement an agency Language **Access Plan**.
- c. **Gender Identity Equal Access** -Sub recipients/Contractors must comply with HUD’s 2012 “Gender Identity Equal Access Rule”. To effectively comply with this rule, Subcontractors must:
 - Make decisions related to placement and accommodations in single-sex shelters and facilities in accordance with the resident’s gender identity.
 - Incorporate Gender Identity Equal Access into their existing discrimination policies.
 - Educate staff and other clients about non-discrimination practices.

Sub recipients are also encouraged to complete the gender identity equal access assessment tool to further their understanding of and adherence to HUD’s “Gender Identity Equal Access Rule”.

- d. **Domestic Violence Victims** - Domestic violence victims and other persons in need of victim services must have access to a safe setting and have their identity protected. Sub recipients are required to implement

procedures to ensure confidentiality of records pertaining to any individual who is provided family violence prevention, treatment or other services. Sub recipients must also certify that the address of a family/individual violence shelter will not be made public without permission of the shelter agency. Sub recipient emergency shelter policies and procedures must:

- Prohibit disclosing personally identifying victim information to any third party without consent of the victim;
- Ensure victim consent is reasonably time-limited, written and specific as to whom information will be shared;
- Identify and utilize an alternative HMIS to collect program data that will prevent the disclosure of personally identifying victim information; **and**
- Include confidentiality policies and procedures that require staff to refrain from discussing client information in public and ensure client records are secure and only accessible to authorized staff.

12. Lead-Based Paint Requirements for Emergency Shelters

The lead-based paint requirements exist to protect vulnerable families from potential health hazards. To prevent lead-poisoning in young children, CHF Contractors/Sub recipients operating emergency shelters must comply with the Lead-Based Paint Poisoning Prevention Act of 1973 and its applicable regulations.

According to the Lead-Based Paint (LBP) Hazard Regulations at 24 CFR Part 35, Subpart K, which is hereby included for reference “Most emergency shelters are exempt from the regulations, such as studio apartments, dormitories, SRO units, barracks and group homes”. Any emergency shelters built prior to 1978 need only comply with the following simplified lead requirements:

- Provide the Lead Hazard Information Pamphlet available through HUD;
- Do a visual assessment of painted surfaces to identify deterioration;
- Complete paint stabilization by repainting deteriorating surfaces; and
- Incorporate ongoing LBP maintenance.

Housing that is not exempted by the definitions above, or housing where children under the age of six (6) reside frequently, **is subject to all Federal and State LBP regulations (obtain a RI Certificate of Conformance or Lead Safe Certificate) for the shelter.**

12. Minimum Period of Use

- a. **Emergency Shelter Operations** - The sub recipient must provide services to homeless individuals and families for at least the period during which CHF funds are provided.
- b. **Emergency Shelter Renovations** - For costs of rehabilitation, conversion or renovation to be eligible for payment with ESG funds, the building must be used for an emergency shelter for homeless families and individuals. A government entity or private non-profit organization must own the emergency shelter building before and after the renovation or rehabilitation. Buildings renovated with ESG funds as a shelter for homeless individuals and families are required to function as a shelter for a minimum period of time, depending on the type of renovation and the value of the building. See following table.

Rehabilitation and Renovation Minimum Period of Use		
	Use Requirement	Determining Criteria
Major Rehabilitation	10 years*	Rehab costs exceed 75% of the value of the building before rehabilitation.
Conversion	10 years*	Conversion costs exceed 75% of the value of the building after conversion.
Renovation, including rehab and conversion costs that do not meet 10 Year criteria.	3 years	Renovation costs are 75% or less of the value of the building before renovation.
*Recorded deed or use restriction required.		

13. Performance Standards

Sub-recipients will be evaluated using the following measures:

Emergency Shelters/Safe Homes (Families)

- Average utilization rate for emergency shelter beds is no less than 65%, and not more than 105%.
- A minimum of 50% of clients exit to Permanent Housing.
- No more than 10% of clients exit to Emergency Shelter.
- The average length of stay for Emergency Shelters is 45 days or less. The average length of stay for Operation First Step Programs is 180 days or less.
- 35% of adult stayers will gain or increase income from entry to exit.
- 60 % of adult participants with no non-cash benefits (health, insurance, food stamps) etc. will have cash benefits at program exit.

Emergency Shelters/Safe Homes (Individuals)

- Average utilization rate for emergency shelter beds is no less than 65%, and not more than 105%.
- Average length of enrollment is 90 days or less.
- A minimum of 80% of clients that exit activities funded under this contract will exit to Permanent Housing.
- No more than 10% of clients who exit activities funded under this contract will exit to Emergency Shelter.
- No more than 5% of clients who exit activities funded under this contract will exit to Unknown Destinations.
- The average length of stay for emergency shelters shall be 45 days or less. The average length of stay for Operation First Step programs shall be six months or less.
- 35% of adult stayers will gain or increase income from entry to exit.
- 60 % of adult participants with no non-cash benefits (health, insurance, food stamps) etc. will have cash benefits at program exit.

C. Rapid Rehousing

Rapid Rehousing (RRH) Programs are designed to help those who are homeless quickly transition out of homelessness (less than 28 days after entering shelter) into permanent housing. The primary goal is to stabilize program participants in housing as quickly as possible and to provide wrap-around services after the family or individual obtains housing. Rapid Re-housing may be provided to program participants who meet the criteria under category (1) of the "homeless" definition in § 576.2 or

who meet the criteria under category (4) of the “homeless” definition and live in an emergency shelter or other place described in category (1) of the “homeless” definition.

1. Target Population and Prioritization

In providing Rapid Rehousing Assistance, CHF Sub-recipients/Contractors shall prioritize the following subpopulations:

- Families with children;
- Domestic violence survivors;
- Veterans

2. RRH Eligibility Determination

Determination of eligibility for rapid re-housing requires an initial assessment to verify that clients meet HUD’s categorical definition for literally homeless or fleeing/attempting to flee domestic violence and are literally homeless. Homeless status must be documented in client files in accordance with HUD documentation standards with preference given to third-party verification where available. CHF Sub-recipients/Contractors will utilize the VI/SPDAT/SPDAT to assess program participants’ eligibility (in accordance with the CoC Policies and Procedures for The Statewide Coordinated Entry System for Homeless Services) and the intervention (s) necessary to resolve homelessness and their placement on the Housing Prioritization List. In all cases a household must lack sufficient resources and support networks necessary to obtain or retain housing without the provision of CHF assistance to be program eligible.

3. Cooperating with the Statewide Coordinated Entry System for Homeless Services

CHF Sub-recipients must provide information to the RI CoC Coordinating Entity regarding the rental assistance model used by their program, and their standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide to a program participant, including the limits, if any, on the rapid rehousing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participant may receive assistance; or the maximum number of times the program participant may receive assistance.

4. RRH Eligibility Re-Certification

CHF Sub-recipients/Contractors must re-evaluate RRH program participant’s eligibility and the types and amounts of assistance **RRH program participant needs at least every 90 days to determine the need for continued assistance**. At a minimum, each re-evaluation of eligibility must establish that:

- The program participant must have an annual income that **is less than or equal to 30 percent** of median family income (see Table 3.3 below) for the area, as determined (HUD Extremely Low-Income Levels can be found at <https://www.huduser.gov/portal/datasets>); by HUD and
- The program participant lacks sufficient resources and support networks necessary to retain housing without CHF assistance.

Through each re-evaluation, the sub-recipient must determine and document that the continuation of assistance is necessary to avoid literal homelessness.

e. Housing Search and Placement Services

CHF Sub-recipients must provide housing location assistance for clients as a part of its full housing relocation and stabilization services to program participants. Housing location assistance includes the following:

- 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;
- Assessment of housing for compliance with CHF guidelines, including requirements for habitability, lead – based paint, and rent reasonableness.

As a part of housing location services provided, CHF Sub-recipients are also expected to educate property owners/landlords and familiarize them with the rapid rehousing program and its requirements.

f. Housing Stability Case Management

While providing rapid rehousing assistance to a program participant, the sub- **recipient must require the program participant to meet with a case manager not less than once per month** to assist the program participant in ensuring long-term housing stability. The Sub-recipient in providing housing stability case management must also adhere to all other case management standards established by the CHF as outlined in Section III, CHF Administrative Requirements, Part G, including the requirement to “ensure that a housing and services plan is completed for all program participants.

Finally, housing stability case management assistance cannot exceed 30 days during the period in which the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing.

g. Determining Client’s Share of Rent

CHF standards require that whatever rent assistance model is chosen by the CHF Sub-recipient, that it must be consistently implemented for all program participant households that receive rental assistance dollars.

Acceptable models include:

- Income Based Subsidy: Household rent share is based on a specific percentage of household income (e.g., 10 percent, 20 percent, 30 percent).
- Flat Subsidy: The subsidy is a set amount each month for all households (e.g., all households get a maximum of \$200.00) per month.
- Declining Subsidy/Progressive Engagement: Whether income-based or fixed, the subsidy declines in “steps” based upon a fixed timeline or when the individual has reached specific goals, until the household assumes full responsibility for monthly housing costs. The steps are known and documented in advance.

Regardless of model implemented, no RRH program participant should pay more than 30% of their household income towards rent.

h. Determining Duration and Amount of Rental Assistance Provided to Client

The duration of rental assistance is limited to twenty-four months within a 3-year time period. Short-term assistance can be provided up to three (3) months and medium-term assistance is limited to twenty-four (24) months. **The amount of rent assistance provided must be the least amount needed to stabilize clients in their permanent housing.** Sub-recipients have the discretion to further set a maximum number of months (that does not exceed the limits specified herein) that a client may receive rental assistance and the maximum dollar amount of assistance. The process for determining such conditions must be applied consistently for all households within each CHF funded program, incorporated into the sub recipients Rapid Rehousing and Rental Assistance policies and procedures and communicated in advance to eligible program participants.

i. Determining Type, Amount, and Duration of Housing Stabilization and/or Relocation Services Provided to Client

Type of Housing Stabilization and/or Relocation Services is limited to financial assistance costs and service costs, subject to the general conditions and restrictions identified under 24 CFR 576.103 and 576.104. Security deposits are limited to no more than 1 month's rent. CHF 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. This assistance 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.

j. Program Income

Program income is the income received by the Sub-recipient directly generated by a grant-supported activity as explained in 24 CFR 578.97 a. Rents collected from program participants and returned security deposits are considered program income. Rents paid by program participants directly to landlords is not counted as program income. The Sub-recipient is expected to document in accordance with CHF tracking guidelines all program income. Sub-recipients are expected to expend program income prior to expending CHF funds. Sub-recipients must report all program income received on CHF Reimbursement Request Form, and deduct these amounts from the amount of funds being requested.

k. Fair Market Rent (FMR) Requirement

HUD establishes FMRs annually to determine rent ceilings. HUD FMRs can be found at <https://hud.user.gov/portal/datasets/fmr.html>. Gross rent for units supported by CHF Rapid Rehousing dollars must be the same or less than the FMR for that location, while units supported by CHF State Rental Assistance dollars may exceed Fair Market requirements by 10% provided by that the rent is supported by a cost reasonableness survey. The applicable FMR data should be copied and placed in the client file to document the FMR for that participant's unit size and geographic area.

l. Cost Reasonableness Survey

A cost reasonableness survey must be completed for each unit supported by CHF funds. The cost reasonableness survey must include at least three units in the same, general location, condition and size as the

subject unit. A copy of the cost reasonableness survey must be included in the program participant's case file/folder.

m. Calculating Gross Rent

Whether a household is seeking to maintain its current housing or relocate to another unit to avoid homelessness, or exiting homelessness into new permanent housing, the process for determining acceptable rent amounts is the same, the gross rent (rent plus appropriate utility allowance- a utility allowance is a projection of the cost of utilities the client will pay monthly while renting their unit.) must:

- be no greater than the Fair Market Rent set by HUD and
- fit within the limitations resulting from a rent reasonableness analysis. The rent for the unit being assisted with program funds cannot exceed the lesser of the FMR or the rent reasonableness standard. If the gross rent for the unit exceeds either the rent reasonableness standard or FMR, the sub recipient is prohibited from using CHF funds for any portion of the rent, even if the household is willing and/or able to pay the difference.

The sub recipient must determine the amount of utility allowance to be used in the calculation of gross rent. The local public housing authority maintains a utility allowance chart which considers the number of bedrooms and types of utilities in a unit (e.g.; gas and/or electric, water, sewer, and trash). Any utilities included in the rent payment must not also be included in the utility allowance calculation. Telephone, cable or satellite television service, and internet service are not counted as utility costs.

n. Use with Other Subsidies

Financial assistance under paragraph 24 CFR 576.105 cannot be provided to a program sub recipient who is receiving the same type of assistance through other public sources or to a program sub recipient who has been provided with replacement housing payments under the URA, during the period of time covered by the URA payments.

o. Rental Assistance Agreement

The sub recipient may make rental assistance payments only to an owner with whom the sub recipient has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided, including the requirements that apply under this section. The rental assistance agreement must provide that, during the term of the agreement, the owner must give the sub recipient a copy of any notice given to the program sub recipient to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program sub recipient. The sub recipient must make timely payments to each owner in accordance with the rental assistance agreement. The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program sub recipient's lease. The sub recipient is solely responsible for paying late payment penalties that it incurs with non-CHF funds. The rental assistance agreement with the owner must terminate and no further rental assistance payments under that agreement may be made if:

- The program participant moves out of the housing unit for which the program participant has a lease;

- The lease terminates and is not renewed; or
- The program participant becomes ineligible to receive CHF rental assistance.

p. Lease

- Tenant-Based Rental Assistance - Each program participant receiving rental assistance must have a legally binding, written lease for the rental unit. The lease must be between the owner and the program participant. A program participant who receives tenant-based rental assistance may select a housing unit in which to live and may move to another unit or building and continue to receive assistance, as long as the program participant continues to meet program requirements.
- Project Based Rental Assistance -For program participant's living in housing with project-based rental assistance, the lease must have an initial term of at least one year. If the sub-recipient identifies a rental unit that meets CHF requirements and becomes available before a program participant is identified to lease the unit, the sub-recipient may enter into a rental assistance agreement with the owner to reserve the unit, provided that a program participant signs a lease and moves into the unit before the end of the month for which the first month's rent is paid. Under RRH guidelines, the sub-recipient may not condition the receipt of rental assistance upon program participants living in units owned by the sub-recipient.

q. Unit Inspection

Unit inspections are required for any household receiving either short-term or long-term rental assistance. Inspections must be conducted upon initial occupancy and signed by the Sub-recipient. This unit inspection must include the Habitability Standards Checklist as well as a Lead-Based Paint inspection which is required by HUD and the State of Rhode Island.

r. Minimum Standards for Permanent Housing.

The Sub-recipient cannot use CHF funds to help a program Sub recipient remain or move into housing that does not meet the minimum habitability standards provided in this paragraph. The Sub recipient may also establish standards that exceed or add to these minimum standards. ([Habitability Standards Checklist](#) website)

- Structure and materials. The structures must be structurally sound to protect residents from the elements and not pose any threat to the health and safety of the residents.
- Space and security. Each resident must be provided adequate space and security for themselves and their belongings. Each resident must be provided an acceptable place to sleep.
- Interior air quality. Each room or space must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.
- Water supply. The water supply must be free from contamination.
- Sanitary facilities. Residents must have access to sufficient sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.
- Thermal environment. The housing must have any necessary heating/cooling facilities in proper operating condition.

- Illumination and electricity. The structure must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the structure.
- Food preparation. All food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.
- Sanitary conditions. The housing must be maintained in a sanitary condition.
- Fire safety
 - There must be a second means of exiting the building in the event of fire or other emergency.
 - Each unit must include at least one battery-operated or hard-wired smoke detector, in proper working condition, on each occupied level of the unit. Smoke detectors must be located, to the extent practicable, in a hallway adjacent to a bedroom. If the unit is occupied by hearing impaired persons, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired person.
 - The public areas of all housing must be equipped with a sufficient number, but not less than one for each area, of battery-operated or hard-wired smoke detectors. Public areas include, but are not limited to, laundry rooms, community rooms, day care centers, hallways, stairwells, and other common areas.

s. Lead Based Paint Requirements

Rapid Re-Housing services are subject to lead regulations because the units assisted with these funds are not temporary residences and do not fall under the shelter exemption. Assistance for first month's rent cannot be provided for housing units that are not known to be free of LBP contamination. To meet this requirement, Sub-recipients must obtain a RI Certificate of Conformance or Lead Safe Certificate for each unit that has been rented using CHF funds.

t. Performance Standards

Rapid Rehousing (Individuals & Families)

- A minimum of 85% of clients that exit activities funded under this contract will exit to Permanent Housing.
- No more than 15% of clients who exit activities funded under this contract will exit to Emergency Shelter.
- 25% of adult stayers will gain or increase income from entry to exit.
- 25 % of adult participants with no non-cash benefits (health, insurance, food stamps) etc. will have cash benefits at program exit.

3.5 State Rental Assistance

The State Rental Assistance Program is designed to help the chronically homeless achieve housing stability. The primary goal is to address the barriers and challenges that cause individuals and families to be chronically homeless, while also working to stabilize program participants in housing through the provision of wrap around services after

the family or individual obtains housing. CHF Contractors receiving State Rental Assistance Funds **are required** to follow all the Rapid Rehousing Standards described above, with the following exceptions:

1. **Chronically Homeless** –Contractors shall prioritize individuals and families who meet the CoC’s definition of Chronically Homeless for State Rental Assistance support.
2. **Duration of Rental Assistance**- The CHF will waive the 24-month time limit for rental assistance for a limited number of state rental assistance units on an annual basis. CHF Contracts with units that have this time exception will be designated as such.
3. **Percentage of Income Used for Rent**- In select circumstances, when there is documented evidence that the household income will increase, (thereby resulting in a temporary cost burden to the household), households receiving state rental assistance, may utilize more than 30% of their gross household income for rent.
4. **VI SPDAT Score** – Contractors **may provide rental assistance to households with higher VI-SPDAT scores** than those set for CHF Rapid Rehousing Programs.
5. **FMR Requirements** – Generally, units supported by State Rental Assistance funds must meet Fair Market Rent (FMR) requirements, but may exceed FMR requirements by 10% if the increased rent is supported by a cost reasonableness survey and with CHF prior approval.
6. **Income Requirements** – Generally, program participants’ must have an annual household income that is **below** 30 percent of median family income for the area, as determined by HUD. In some circumstances, it is allowable, for program participants to have a household income that is up to 40 percent of median family income for the area, as determined by HUD.
7. **Project-Based Rental Assistance** – is allowed for properties owned by CHF Contractors.

Any other exception, to the Rapid Rehousing Guidelines, under the State Rental Assistance Program requires prior written approval from the State Office of Housing and Community Development.

V. CHF Recordkeeping Requirements

A. Policies and Procedures 576.500 Recordkeeping and Reporting Requirements

Sub-recipients/Contractors must have policies and procedures in place to ensure that the requirements of this part are met, including those required by 2 CFR part 200. The policies and procedures must be established in writing and implemented to ensure that CHF/ESG funds are used in accordance with these requirements. In addition, sufficient records must be established and maintained to enable the CHF and HUD to determine whether CHF/ESG requirements are being met.

B. Homeless Status

Sub-Recipients/Contractors must maintain and follow written intake procedures to ensure compliance with the homeless definition in § 576.2. The procedures must require **documentation at intake of the evidence (see Appendix 3, Reference Table 2 for additional information regarding documenting homeless status) relied upon to establish and verify homeless status. The procedures must establish the order of priority for obtaining evidence as third-party documentation first, intake worker observations second, and certification from the person seeking assistance third.** However, lack of third-party documentation must not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider. Records contained in an HMIS or comparable database used by victim service or legal service providers are acceptable evidence of third-party documentation and intake worker observations if the HMIS retains an auditable history of all entries, including the person who entered the data, the date of entry, and the change made; and if the HMIS prevents overrides or changes of the dates on which entries are made.

C. Annual Income

For each program participant who receives rapid re-housing assistance and/or state rental assistance for longer than one year, the following documentation of annual income must be maintained:

- Income evaluation form containing the minimum requirements specified by HUD and completed by the sub-recipient; and
- Source documents for the assets held by the program participant and income received over the most recent period for which representative data is available before the date of the evaluation (e.g., wage statement, unemployment compensation statement, public benefits statement, bank statement, see Appendix 3, Reference Table 3 for additional information regarding documenting income and expenses);
- To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., employer, government benefits administrator) or the written certification by the recipient's or sub-recipient's intake staff of the oral verification by the relevant third party of the income the program participant received over the most recent period for which representative data is available; or
- To the extent that source documents and third party verification are unobtainable, the written certification by the program participant of the amount of income the program participant received for the most recent period representative of the income that the program participant is reasonably expected to receive over the 3-month period following the evaluation.

D. Program Participant Records

In addition to evidence of homeless status or “at risk of homelessness” status, as applicable, records must be kept for each program participant that document:

- The services and assistance provided to that program participant, including, as applicable, the security deposit and rental assistance payments made on behalf of the program participant;
- Compliance with the applicable requirements for providing services and assistance to that program participant under the program components and eligible activities provisions at § 576.101 through § 576.106, the provision on determining eligibility and amount and type of assistance at § 576.401(a) and (b), and the provision on using appropriate assistance and services at § 576.401(d) and (e); and
- Where applicable, compliance with the termination of assistance requirement in § 576.402.

E. Centralized or Coordinated Assessment Systems and Procedures.

CHF Sub-Recipients/Contractors must keep documentation evidencing the use of, and written intake procedures for, the centralized or coordinated assessment system(s) developed by the Continuum of Care(s) in accordance with the requirements established by HUD.

F. Rental Assistance Agreements and Payments.

The records must include copies of all leases and rental assistance agreements for the provision of rental assistance, documentation of payments made to owners for the provision of rental assistance, and supporting documentation for these payments, including dates of occupancy by program participants.

G. Shelter and Housing Standards.

The records must include documentation of compliance with the shelter and housing standards in § 576.403, including inspection reports.

H. Services and Assistance Provided.

The recipient must keep records of the types of essential services, rental assistance, and housing stabilization and relocation services provided under the recipient's program and the amounts spent on these services and assistance. The recipient and its sub-recipients that are units of general purpose local government must keep records to demonstrate compliance with the maintenance of effort requirement, including records of the unit of the general purpose local government's annual budgets and sources of funding for street outreach and emergency shelter services.

I. HMIS.

The recipient must keep records of the participation in HMIS or a comparable database by all projects of the recipient and its sub-recipients.

J. Conflicts of Interest

The recipient and its sub-recipients must keep records to show compliance with the organizational conflicts-of-interest requirements in § 576.404(a), a copy of the personal conflicts of interest policy or codes of conduct developed and implemented to comply with the requirements in § 576.404(b), and records supporting exceptions to the personal conflicts of interest prohibitions.

K. Homeless Participation

The recipient must document its compliance with the homeless participation requirements under § 576.405.

L. Faith-Based Activities

Sub-recipients must document their compliance with the faith-based activities requirements under § 576.406.

M. Other Federal Requirements

Sub-recipients must document their compliance with the Federal requirements in § 576.407 and § 576.409, as applicable, including:

- Records demonstrating compliance with the nondiscrimination and equal opportunity requirements under § 576.407(a) and the affirmative outreach requirements in § 576.407(b), including: (i) Data concerning race, ethnicity, disability status, sex, and family characteristics of persons and households who are applicants for, or program participants in, any program or activity funded in whole or in part with ESG funds; and
- Documentation required under 24 CFR 5.168 in regard to the recipient's Assessment of Fair Housing and the certification that the recipient will affirmatively further fair housing.
- Records demonstrating compliance with the uniform administrative requirements in 2 CFR part 200.
- Certifications and disclosure forms required under the lobbying and disclosure requirements in 24 CFR part 87.
- Data on emergency transfers requested under § 576.409, pertaining to victims of domestic violence, dating violence, sexual assault, or stalking, including data on the outcomes of such requests.

N. Financial records

- Sub-recipients must keep documentation showing that ESG grant funds were spent on allowable costs in accordance with the requirements for eligible activities under “ §§ 576.101 through 576.109, financial management in 2 CFR 200.302, and the cost principles in 2 CFR part 200, subpart E.
- Sub-recipients must retain records of the receipt and use of program income.

VI. Financial Management Requirements

A. Compliance with 2 CFR, Part 200

The Sub recipient/Contractor will comply with The Federal Office of Management and Budgets, Uniform Administrative Requirements, Cost Principles and Audit Requirements in 2 CFR, Part 200 and adhere to the accounting principles and procedures required therein, develop and implement adequate internal financial controls, and maintain required source documentation for all costs incurred.

The Sub recipient/Contractor shall maintain separate cost centers and/or accounts for all expenditures under their CHF Contract Agreement. The Contract agreement between the Sub recipient/Contractor and the CHF will be a very important document throughout the life of the project. The Contract Agreement must be executed before any funds can be disbursed or expended. FUNDS COMMITTED OR EXPENDED BEFORE THE CONTRACT PERIOD WILL NOT BE REIMBURSED FROM CHF FUNDS. The Contract Agreement will ensure compliance with the regulations of the CHF program.

B. Ineligible Contractors

The use of debarred, suspended, or ineligible contractors in association with CHF project activities is prohibited. The provisions of 2 CFR Part 200 relating to the employment, engagement of services, awarding of contracts, or funding of any contractors or subcontractors during any period of debarment, suspension, or placement in ineligibility status apply and are enforceable under the CHF Program.

C. Individual conflicts of interest

For the procurement of goods and services, sub-recipients must comply with the codes of conduct and conflict of interest requirements under 2 CFR 200 (for governments) and (for private nonprofits). For all other transactions and activities, the following restrictions apply:

1. **Conflicts prohibited:** No persons described in this section who exercise or has exercised any functions or responsibilities with respect to activities assisted under the CHF program or who is in a position to participate in a decision-making process or gain inside information with regard to activities assisted under the program, may obtain a financial interest or benefit from an assisted activity; have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity; or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has family or business ties, during his or her tenure or during the one-year period following his or her tenure;
2. **Persons covered:** the conflict-of-interest provisions of this section apply to any person who is an employee, agent, consultant, officer, or elected or appointed official of the sub- recipient.
3. **Contractors:** All contractors of CHF or sub-recipient must comply with the same requirements that apply to sub-recipients under this section.

D. Audit Requirements

The fiscal management system of a unit of local government, which receives CHF funds, must provide for audits in accordance with the requirements of 2 CFR Part 200. An A-133 Audit (Single Audit), is required for expenditures of \$750,000.00 or more in Federal Awards during the grantee'

E. Procurement Rules

2 CFR Part 200 provides regulations that govern the procurement of supplies, equipment, construction and services to ensure that they are obtained economically and competitively. In summary, Sub recipients may use their own procurement procedures as long as they conform to the regulations. Important elements for Sub recipients to consider are: a system to handle contract disputes; a code of conduct preventing conflicts of interest; some form of cost analysis to ensure economic purchases; positive efforts to use small, minority- and woman-owned businesses to the maximum extent possible.

F. Property Controls

The Federal regulations regarding property controls in 2 CFR 200 (f) are for the purpose of tracking the assets purchased with grant funds to ensure that they are properly maintained, secure and being used for authorized purposes. CHF is required to do a periodic physical inventory on these items to verify their existence, current utilization and continued need. For this reason, agencies using CHF funds to purchase furnishings, vehicles or equipment for an activity should keep accurate records including the following: a complete description of the item purchased a serial or other identification number, the source of funds and Grant Agreement number, the acquisition date and the cost.

G. Budget Controls

The Sub recipient will have a regular, on-going basis of comparison between actual expenditures and CHF-budgeted amounts for the activities. The CHF budget will cover intended activity expenses with very little necessity for adjustments during the grant period. The Sub recipient will also relate its financial information to recorded outcomes, since awards are more likely to be made when performance measures are in place and outcomes are tracked.

H. Budget Changes

All budget changes require CHF approval. Submit a Budget Change Request form electronically to your CHF project officer. At the discretion of CHF, additional information or a Work Plan Amendment Request form may be required. Revisions to approved CHF allocations depend upon federal limitations pertaining to percentages committed to each category, grant expenditure timelines, as well as the sub-recipient's ability to draw down the funds.

I. Spending Deadlines and Recapture

A normal spending cycle for the CHF is 12 months. Sub recipients are expected to plan their budgets in a way that project goals are met by the end of the spending period with little or no budget adjustments. In the event that CHF determines a Sub recipient to be unable to spend all grant monies by the contractual deadline, funds may be recaptured and redistributed to a recipient that will be able to spend the funds in a timely manner on eligible activities. Any Sub recipient having funds recaptured by CHF in a grant cycle will have the same amount subtracted from any CHF award made to that applicant in the following grant cycle. Sub recipients that are slow to expend the funds may have funds de-obligated and allocated to another grantee.

J. Segregation of Funds

Sub-recipients/Contractors will maintain an accounting system which segregates each CHF funded Program. Additionally, the accounting system should assure that program costs and expenditures are recorded and documented properly. All accounting must meet published standards for accountants. Generally Accepted Accounting Principles (GAAP). Accounting records must include reliable, up-to-date information on the sources and uses of funds, including:

- Amount of Federal funds received
- Obligations of funds
- Unobligated balances
- Assets and liabilities
- Program Income
- Actual expenditure broken down by grant program and year for which the funds are derived and the activity on which the funds were used

K. Allowable Costs

1. Program Costs -Allowable program costs are those costs associated with direct operation of the program, and they meet the following additional conditions:
 - Necessary and reasonable to carry out the project/program;
 - Authorized (or not prohibited) under Federal, State or local laws or rules;
 - In conformance with OMB Guidance;
 - Consistent with state and local government activities;
 - Allocable to the award-funded activities;
 - Consistent with Generally Accepted Accounting Principles (GAAP);
 - Not used for Cost sharing or matching requirements of any other Federal Award; and
 - Adequately documented.
2. Administrative Costs - Allowable administrative costs are those costs associated with the general management of the organization. These costs may include, but are not exclusive to: executive management; human resources; accounting, board expenses; general insurance; agency-wide audit; and space and equipment costs attributable to the agency as a whole. Administrative costs must be charged

to grant cost centers based on either a cost allocation plan or through use of an approved federal indirect cost proposal.

L. Match Requirements

Due to the unique collaboration of the Consolidated Homeless Fund, the CHF Partnership is able to provide 100% matching funds without transferring match responsibility to CHF sub-recipients. Funds that are leveraged through CHF include the state's homelessness funding through the HRC, Social Service Block Grant funds (passed through to the HRC from the State's Dept. of Human Services) and State Rental Assistance dollars. Thus, these funds should not be used by Sub-recipient(s) as match for other grant obligations.

M. Reimbursement of Costs

Instructions and forms for requesting reimbursement for eligible expenses are supplied by CHF with the Grant Agreement. The CHF is built on a reimbursement basis and only costs that have already been paid will qualify. Invoices and receipts with proof of payment will be required before draws will be processed. According to CHF policy guidelines provided by HUD, it is the responsibility of CHF "to minimize the time between when a recipient incurs grant expenses and when it seeks reimbursement from the Federal government" (24 CFR 85.20 (b) (7)).

- Sub-recipients are encouraged to submit requests for reimbursement not less than once a month. The CHF shall make timely payments to each of its sub-recipients within 30 days after the date of receiving a complete Request for Reimbursement.
- All grant funds must be expended within 12 months unless otherwise specified in the sub-recipient agreement.
- Sub recipients are responsible to use the reimbursement forms provided by CHF to ensure that funds will be extracted from the proper grant.
- Sub recipients must adhere to the line items approved by CHF on the budget submitted with the Grant Application for all reimbursement requests.
- Request for reimbursements must be signed by an authorized person designated on CHF's Request for Funds.
- All requests for reimbursement should include appropriate documentation. Sub-recipients should note that reimbursement requests are generally paid within 30 days. Reimbursement might take longer in cases where the sub-recipient fails to submit appropriate documentation, or when the amount being requested is not reflected in the approved budget. When in doubt, contact your CHF Program Officer for assistance. Appropriate documentation includes the following:
 - Date of Service- Only expenses incurred on or after the date of the formal award is allowable. This includes utility receipts that may have service dates beginning before this date, but ending within the grant period. If services begin before the date of the award, receipts must be pro-rated to reimburse costs only for the eligible days within the service period.

- Copies of invoices/receipts for all expenditures incurred during the request for reimbursement period.
- Payroll records (copy of check stub or accounting records) for all salaries charged to CHF. Employee timesheets must accompany reimbursement requests.
- Mileage reimbursement requests must include employee mileage logs.

VII. CHF Sub-Recipient Monitoring

A. Program Monitoring Overview

The CHF uses monitoring to help CHF/ESG sub-recipients who receive funding through the Consolidated Homeless Fund to identify problems or potential problems, and to help sub-recipients correct them. The objectives of CHFP monitoring are to determine if Sub-recipients are:

- Carrying out activities as described in their contracts (as modified or amended).
- Carrying out the program in a timely manner, in accordance with the CHFP contract.
- Charging only eligible costs to the program or project.
- Complying with other applicable laws, regulations and terms of the CHFP contract.
- Conducting the program in a manner that minimizes the opportunity for fraud, waste and mismanagement.

B. Management of Monitoring Activities

CHF staff (*OHCD for State Contracts and the respective entitlement staff for their local contracts*) monitors Sub-recipients' performance utilizing a combination of desktop and on-site monitoring.

1. Desktop Review Monitoring - Desktop review monitoring is an on-going process of reviewing grantee performance that uses all available data in making judgements about grantee performance and is conducted by the CHF or the respective ESG entitlement community. Among the sources of information to be reviewed during a desktop review are:

- Request for Reimbursement and back-up documentation provided
- Audit Reports
- Approved Applications
- Quarterly/Progress Reports
- Citizen and Client Complaints

Analysis of the data may indicate the need for a special monitoring visit to resolve or prevent a problem.

2. On-Site Monitoring- In addition to desktop monitoring, CHF staff may conduct an on-site monitoring visit.

These visits shall be conducted as necessary. Areas to be monitored may include, but are not limited to:

- Project Progress
- Overall Program Management
- Shelter/Facility
- Policies and Procedures (especially those relating to the ESG Program)
- Contract Management
- Financial Management
- HMIS and Data Tracking
- Client File Review
- Record Keeping

Sub-recipients are contacted at least one month prior to the planned date of an on-site monitoring to schedule. Once a date has been set, a formal written letter is sent to confirm:

- The date and time of the visit;
- The names and titles of the staff conducting the monitoring;
- The elements of the program to be monitored; and
- The files and records to be reviewed.

3. During the On-Site Monitoring- CHF staff complete the following steps when conducting an on-site monitoring:

- Conduct an entrance conference with the executive director, director of programs, or other sub recipient official to explain the purpose and schedule for the review.
- Interview members of the sub recipient staff to gather information about sub recipient's activities and performance.
- Review additional materials provided by the sub recipient that provide more detailed information about the program/project.
- Examine a sample of expenditures for required documentation and to verify the accuracy of information provided on invoices.
- Perform a fiscal review of the program to assure compliance with applicable OMB circulars.
- Review a sample of client files for required documentation that program participants meet eligibility requirements and that they are provided access to supportive services.
- Hold an exit interview with appropriate subfreezing staff to discuss the preliminary conclusion of the review and identify any follow-up actions the sub recipient will need to take.

4. Monitoring Results - Within 60 days after completion of monitoring, CHFP will send written correspondence to the sub recipient describing the results – in sufficient detail to clearly describe the areas that were covered and the basis for the conclusions. Each monitoring letter will include:

- Date(s) of the monitoring.
- Name(s) and title(s) of the CHFP staff person who performed the monitoring review.
- A listing of the program activity areas reviewed (which, in most cases, will repeat the areas outlined in the notification letter to the participant).
- A brief explanation of the reasons why an area specified in the notification letter was not monitored (e.g., time constraints, unanticipated problems arising in another area).
- Monitoring conclusions (both positive and negative), supported by facts considered in reaching the conclusions.
- Clearly labeled findings and concerns.
- If there are findings, an opportunity for the sub recipient to demonstrate, within a time prescribed by HUD, that the participant has, in fact, complied with the requirements.
- Due date of required action.
- An offer of technical assistance, if needed, or a description of technical assistance provided during the monitoring.

Appendix 1: Applicable Rules and Regulations

Applicable Rules and Regulations:

1. This manual as a guideline for CHF program management.
2. HUD ESG Resources: <https://www.hudexchange.info/esg/>
 - ESG Program Guidance
 - Federal Regulations
 - Tools and Technical Assistance
 - Frequently Asked Questions
3. The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009 (S. 896)
4. 24 CFR part 576: [Emergency Solutions Grant Program](#)
5. 24 CFR part 121: [Homeless Management Information System \(HMIS\)](#)
6. [2 CFR Part 200 Uniform Administrative Requirements](#)
7. [24 CFR 5.609: Annual Income](#)
8. [Annual Median Income: https://www.huduser.gov/portal/datasets/il/il16](#)
9. The Fair Housing Act 42 U.S.C. 3601-3607
10. 24 CFR part 982: [Fair Market Rent and Rent Reasonableness](#)
11. HUD Fair Market Rents: <https://www.huduser.gov/portal/datasets/fmr.html>
12. Lead-Based Paint: <http://www2.epa.gov/lead> and [24 CFR part 35](#)
13. Lead-Based Paint pamphlet:
<http://portal.hud.gov/hudportal/documents/huddoc?id=DOC11875.pdf> CFRs cited are amended from time to time and can be found at: <http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&tpl=%2Findex.tpl>
14. Social Service Block Grant Regulations (CFR 45.96.1 - 45.96.74)
15. Violence Against Women Act (VAWA) Requirements for HUD Programs:
<https://www.hudexchange.info/resource/4718/federal-register-notice-proposed-rule-violence-against-women-act-2013-vawa-2013/>

Appendix 2: Definitions

7.11.1.1 Definitions:

Consolidated plan means a plan prepared in accordance with 24 CFR part 91. An approved consolidated plan means a consolidated plan that has been approved by HUD in accordance with 24 CFR part 91.

Continuum of Care means the group composed of representatives of relevant organizations, which generally includes nonprofit homeless providers; victim service providers; faith-based organizations; governments; businesses; advocates; public housing agencies; school districts; social service providers; mental health agencies; hospitals; universities; affordable housing developers; law enforcement; organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons that are organized to plan for and provide, as necessary, a system of outreach, engagement, and assessment; emergency shelter; rapid re-housing; 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.

Emergency Shelter means 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. Any project funded as an transitional shelter under a Fiscal Year 2010 Emergency Solutions grant may continue to be funded under CHF.

Homeless Individual or Family:

- (1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - (i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
 - (ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low income individuals); or
 - (iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;
- (2) An individual or family who will imminently lose their primary nighttime residence, provided that:
 - (i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
 - (j) No subsequent residence has been identified; and
 - (ii) 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) 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:
 - (ii) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
 - (iii) 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;
 - (iv) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and

- (v) 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; or ;
- (4) Any individual or family who:
 - (i) 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 their primary nighttime residence;
 - (ii) Has no other residence; and
 - (iii) Lacks the resources or support networks, e.g., family, friends, faith based or other social networks, to obtain other permanent housing.

Chronically Homeless:

- (1) An individual who:
 - (i) Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
 - (ii) Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one year or on at least four separate occasions in the last 3 years, where each homeless occasion was at least 15 days; and
 - (iii) Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002)), posttraumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability;
- (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) 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), including a family whose composition has fluctuated while the head of household has been homeless.

Homeless Management Information System (HMIS) means the information system designated by the Continuum of Care to comply with the HUD's data collection, management, and reporting standards and used to collect sub recipient level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness.

HUD-the U.S. Department of Housing and Urban Development

Internal Controls-a combination of policies, procedures, personnel, defined responsibilities and records that allow an organization to maintain adequate oversight and control of its finances

Major Rehabilitation-rehabilitation that involves costs **in excess of 75% of the value** of the building before rehabilitation. Buildings assisted at this level must be maintained as a shelter for the homeless for not less than a ten-year period.

Private Nonprofit Organization means a private nonprofit organization that is a secular or religious organization

described in section 501(c) of the Internal Revenue Code of 1986 and which is exempt from taxation under subtitle A of the Code, has an accounting system and a voluntary board, and practices nondiscrimination in the provision of assistance. A private nonprofit organization does not include a governmental organization, such as a public housing agency or housing finance agency.

Program Income shall have the meaning provided in 24 CFR 85.25. Program income includes any amount of a security or utility deposit returned to the sub-recipient.

Program Participant means an individual or family who is assisted by the CHF program.

Program Year means the consolidated program year established by the sub recipient under 24 CFR part 91.

Rapid Re-Housing-activities designed to end the incidence of homelessness quickly. Primarily, the funds can be used for rental assistance, first month's rent, security or utility deposits for obtaining permanent housing, as well as relocation and stabilization services, which could include housing case managers who develop landlord relationships, assist with housing search and monitor progress on housing plans for mid-term assistance.

Recipient means any State, territory, metropolitan city, or urban county, or in the case of reallocation, any unit of general purpose local government that is approved by HUD to assume financial responsibility and enters into a grant agreement with HUD to administer assistance under this part.

Rehabilitation-labor, materials, tools and other costs of improving buildings, other than minor or routine repairs. Buildings assisted at this level (other than major rehabilitation) must be maintained as a shelter for the homeless for not less than a three-year period.

Renovation-rehabilitation that involves cost of **75% or less of the value** of the building **before** rehabilitation. Buildings assisted at this level must be maintained as a shelter for the homeless for not less than a **three (3) year period**.

State means each of the several States and the Commonwealth of Puerto Rico.

Sub recipient means a unit of general purpose local government or private nonprofit organization to which a recipient makes available CHF funds.

Transitional Housing-for the purpose of CHF assistance, housing that extends past the "3 days to 3 months" reasonable period for temporary housing (emergency shelter). HUD defines transitional housing as having the "purpose" of moving homeless individuals and families to permanent housing within 24 months. (42 U.S.C. 11384(b))

Unit of general purpose local government means any city, county, town, township, parish, village, or other general purpose political subdivision of a State.

Value of the Building-the monetary value assigned to a building by an independent real estate appraiser, or as otherwise reasonably established

Appendix 3: Eligibility and Documentation Reference Guides

Reference Guide 1: Criteria for Defining Homeless
Reference Guide 2: Documenting Homelessness
Reference Guide 3: Documenting Income and Assets
Reference Guide 4: Income Exclusions

**Reference Table 1:
CRITERIA FOR DEFINING HOMELESSNESS**

Category 1 Street Outreach Emergency Shelter Rapid Re-Housing	Category 2 Emergency Shelter	Category 3 Emergency Shelter	Category 4 Emergency Shelter Rapid Re-Housing
Literally Homeless	Imminent Risk of Homelessness	Homeless under other Federal Statutes	Fleeing/Attempting to Flee DV
<p>Individual or family who lacks, regular and adequate nighttime residence, meaning:</p> <ol style="list-style-type: none"> 1. Primary nighttime residence is public or private and not meant for human habitation. 2. Is living in a public or privately operated shelter (congregate shelters, transitional housing and hotels and motels are paid for by charitable organizations or federal, state and local government. 3. 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. 	<p>Individual or family who will imminently lose their primary nighttime residence, provided that:</p> <ol style="list-style-type: none"> 1. Residence will be lost within 14 days of the date of application for homeless assistance 2. No subsequent residence has been identified; and 3. The individual or family lacks the resources or support networks needed to obtain other permanent housing. 	<p>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:</p> <ol style="list-style-type: none"> 1. Are defined homeless under the listed federal statutes; 2. Have no lease, ownership interest or occupancy agreement in permanent housing for 60 days prior to the homeless assistance application; 3. Have experience persistent instability as measured by two (2) moves or more during in the preceding 60 days; and 4. Can be expected to continue such status for an extended period due to special needs and barriers. 	<p>Any individual or family who:</p> <ol style="list-style-type: none"> 1. Is fleeing, or is attempting to flee domestic violence; 2. Has no other residence; and 3. Lacks the resources or support networks to obtain other permanent housing.

**Reference Table 2:
DOCUMENTING HOMELESSNESS**

Category 1	Category 2	Category 3	Category 4
Literally Homeless	Imminent Risk of Homelessness	Homeless under other Federal Statutes	Fleeing/Attempting to Flee DV
<ul style="list-style-type: none"> • Written observation by outreach worker; or • Written referral by another housing or service provider; or • Certification by individual or head of household stating that (s) he was living on the street or in shelter; • Individuals exiting an institution – one of the forms of evidence above and: <ol style="list-style-type: none"> 1. Discharge paperwork or written/oral referral, or 2. Written record of intake worker’s due diligence to obtain above evidence and certification by individual that they exited institution. 	<ul style="list-style-type: none"> • Court order from an eviction; or • Hotel and motel exit-evidence that they lack the financial resources; or • Documented and verified oral statement; and • Certification that no subsequent residence has been identified; and • Self certification or other written documentation that household lack the financial resources and support necessary to obtain permanent housing (PH). (Use as a last resort) 	<ul style="list-style-type: none"> • Certification by non-profit, local and state government that the household seeking assistance met the homelessness criteria under another federal statute; and • Certification of no PH in last 60 days; and • Certification by the head of household and any available supporting documentation , that (s) he has moved two (2) or more times in the past 60 days; and • Documentation of special needs or 2 or more barriers. 	<ul style="list-style-type: none"> • For victim service providers: Oral statement by individual or head of household which states; they are fleeing; they have no other subsequent residence and lack resources. (Statement must be documented by self certification or intake worker). • For non-victim service providers: <ol style="list-style-type: none"> 1. Oral statement by individual or head of household seeking assistance (documented by self certification or intake worker). The family safety must not be jeopardized. 2. Certification by head of household that no subsequent residence has been identified; and 3. Self Certification or other written documentation, the household lacks financial resources and support networks to obtain other permanent housing. (Use as a last resort)

Reference Table 3: Documenting Income and Assets

A. Household Annual Income

When determining the annual income of an individual or family, the sub recipient must use the standard for calculating annual income under 24 CFR 5.609 as follows:

Annual income means all amounts, monetary or not, which:

- Go to, or on behalf of, the family head or spouse (even if temporarily absent) or to any other family member; or
- Are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and
- Which are not specifically excluded in paragraph (c) of this section.
- Annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access.

B. Income Inclusions

Table 3.2 presents CHF income inclusions. The following types of income must be counted when calculating gross income for purposes of determining CHF eligibility:

Table 3.2 Income Inclusions	
General Category	Description
1. Earned Income	The full amount of gross income earned before taxes and deductions.
2. Self Employment/Business Income	The net income earned from the operation of a business, i.e., total revenue minus business operating expenses. This also includes any withdrawals of cash from the business or profession for your personal use.
3. Int. & Dividend Income	Monthly interest and dividend income credited to an applicant's bank account and available for use.
4. Pension/Retirement Income	The monthly payment amount received from Social Security, annuities, retirement funds, pensions, disability and other similar types of periodic payments.
5. Unemployment & Disability Income	Any monthly payments in lieu of earnings, such as unemployment, disability compensation, SSI, SSDI, and worker's compensation.
6. TANF/Public Assistance	Monthly income from government agencies excluding amounts designated for shelter, and utilities, WIC, food stamps, and childcare.
7. Alimony, Child Support and Foster Care Income	Alimony, child support and foster care payments received from organizations or from persons not residing in the dwelling.
8. Armed Forces Income	All basic pay, special day and allowances of a member of the Armed Forces excluding special pay for exposure to hostile fire.

C. Annualizing Wages and Periodic Payments

When calculating income based on hourly, weekly or monthly payment information, add the gross amount earned in each payment period that is documented and divide by the number of payment periods. This provides an average wage per payment period. Depending on pay periods used by the employer or the

schedule of periodic payments, the following calculations convert the average wage into annual income:

- ✓ Hourly Wage multiplied by hours worked per week multiplied by 52 weeks
- ✓ Weekly Wage multiplied by 52 weeks
- ✓ Bi-Weekly (every other week) Wage multiplied by 26 bi-weekly periods
- ✓ Semi-Monthly Wage (twice a month) multiplied by 24 semi-monthly periods
- ✓ Monthly Wage multiplied by 12 months

If a household's periodic benefits and/or period of employment is capped, Contractors/Sub recipients should not annualize benefits/pay beyond the maximum level of benefit/pay that can be received.

For example, a client receives \$100 of unemployment per week, but unemployment is capped at \$4,000 per year. The client's annualized unemployment benefits should be calculated at \$4,000, and not \$100 * 52 = \$5,200.

Another example, the household is employed for a quarter and will receive \$500/week. The client's annualized pay should be calculated at \$6,000 and not \$500*52 = \$26,000.

With regard to seasonal or cyclical fluctuations in income, **for the purposes of determining household income, grantees should only annualize current gross income** per the directions specified above. However, to the extent that there is certainty about expected income, **future income should be taken into account when determining whether a household has other financial resources**. Remember, grantees need to assess all circumstances and document that the household would be homeless but for the CHF assistance. As such, case managers should carefully evaluate the circumstances and conditions of future income.

D. Treatment of Assets

Program Participants that are deemed eligible for assistance are allowed to retain \$1,000 in cash assets and one vehicle per adult household member (not to exceed more than two vehicles total per household). If a household's cash assets exceed this amount they will be required to contribute the difference towards any CHFP financial assistance they are receiving. Documentation of any household assets shall be kept in their file, along with any receipts showing client contributions to meet asset requirements. Assets are cash or material items that can be converted to cash quickly. They include both real and/or personal property and investments that a household may possess, including assets that are owned by more than one person, but allow unrestricted access to the applicant. Assets are cash or material items that can be converted to cash quickly. They include both real and/or personal property and investments that a household may possess, including assets that are owned by more than one person, but allow unrestricted access to the applicant. Assets may include:

1. Amounts in checking and saving bank accounts.
2. Stocks, bonds, savings certificates, money market funds, and other investment accounts.
3. The cash value of trusts that may be withdrawn by the household.
4. IRA, Keogh and similar retirement savings accounts, even when early withdrawal will result in a penalty.
5. Lump sum receipts of cash received and accessible by household, such as inheritances, capital gains, lottery winnings, tax refunds (with the exception of federal tax refunds received within the previous 12 months), insurance settlements, and other claims.

Reference Table 4: Income Exclusions

This table presents CHF income exclusions. The following types of income are not counted when calculating gross income for purposes of determining CFHP eligibility:

Income Exclusions	
General Category	Description
1. Income of Children	Income from employment of children (including foster children) under the age of 18 years.
2. Inheritance and Insurance Income	Lump-sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains and settlement for personal or property losses (except as provided in number 5 of Income Inclusions).
3. Medical Expense Reimbursements	Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member.
4. Income of Live-in Aides	Income of a live-in aide (as defined in 24 CFR 5.403).
5. Disabled Persons	Certain increases in income of a disabled member of qualified families residing in HOME- assisted housing or receiving HOME tenant-based rental assistance (24 CFR 5.671(a)).
6. Student Financial Aid	The full amount of student financial assistance paid directly to the student or to the educational institution.
7. Armed Forces Hostile Fire Pay	The special pay to a family member serving in the Armed Forces who is exposed to hostile fire.
8. Self-Sufficiency Program Income	<ul style="list-style-type: none"> a. Amounts received under training programs funded by HUD. b. Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS). c. Amounts received by a participant in other publicly assisted programs that are specifically for, or in reimbursement of, out-of-pocket expenses incurred (special equipment, clothing, transportation, childcare, etc.) and which are made solely to allow participation in a specific program. d. Amounts received under a resident service stipend. A resident service stipend is a modest amount (not to exceed \$200 per month) received by a resident for performing a service for the PHA or owner, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to, fire patrol, hall monitoring, lawn maintenance, resident initiatives coordination, and serving as a member of the PHA's governing board. No resident may receive more than one such stipend during the same period of time. e. Incremental earnings and benefits resulting to any family member from participation in qualifying state or local employment training programs (including training not affiliated with a local government) and training of a family member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives, and are excluded only for the period during which the family member participates in the employment training program.
9. Other Non-Recurring Income	Temporary, nonrecurring, or sporadic income (including gifts).
10. Reparations	Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era.
11. Income from Full-time Students	Annual earnings in excess of \$480 for each full-time student 18 years old or older (excluding the head of household or spouse).
12. Adoption Assistance Payments	Adoption assistance payments in excess of \$480 annually per adopted child.
13. Social Security & SSI Income	Deferred periodic amounts from SSI and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts.
14. Income Tax and Property Tax Refunds	Amounts received by the family in the form of refunds or rebates under state or local law for property taxes paid on the dwelling unit.

15. Home Care Assistance	Amounts paid by a state agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep this developmentally disabled family member at home.
General Category	Description
16. Other Federal Exclusions	<p>Amounts specifically excluded by any other federal statute from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under any program to which the exclusions of 24 CFR 5.609(c) apply, including:</p> <ul style="list-style-type: none"> • The value of the allotment made under the Food Stamp Act of 1977; • Payments received under the Domestic Volunteer Service Act of 1973 (employment through VISTA, Retired Senior Volunteer Program, Foster Grandparents Program, youthful offender incarceration alternatives, senior companions); • Payments received under the Alaskan Native Claims Settlement Act; • Income derived from the disposition of funds to the Grand River Band of Ottawa Indians; • Income derived from certain submarginal land of the United States that is held in trust for certain Indian tribes; • Payments or allowances made under the Department of Health and Human Services' Low-Income Home Energy Assistance Program; • Payments received under the Maine Indian Claims Settlement Act of 1980 (25 U.S.C. 1721); • The first \$2,000 of per capita shares received from judgment funds awarded by the Indian Claims Commission or the U.S. Claims Court and the interests of individual Indians in trust or restricted lands, including the first \$2,000 per year of income received by individual Indians from funds derived from interests held in such trust or restricted lands; • Amounts of scholarships funded under Title IV of the Higher Education Act of 1965, including awards under the Federal work study program or under the Bureau of Indian Affairs student assistance programs; • Payments received from programs funded under Title V of the Older Americans Act of 1985 (Green Thumb, Senior Aides, Older American Community Service Employment Program); • Payments received on or after January 1, 1989, from the Agent Orange Settlement Fund or any other fund established pursuant to the settlement in the In Re Agent Orange product liability litigation, M.D.L. No. 381 (E.D.N.Y.); • Earned income tax credit refund payments received on or after January 1, 1991, including advanced earned income credit payments; • The value of any child care provided or arranged (or any amount received as payment for such care or reimbursement for costs incurred for such care) under the Child Care and Development Block Grant Act of 1990; • Payments received under programs funded in whole or in part under the Job Training Partnership Act (employment and training programs for Native Americans and migrant and seasonal farm workers, Job Corps, state job training programs and career intern programs, AmeriCorps); • Payments by the Indian Claims Commission to the Confederated Tribes and Bands of Yakima Indian Nation or the Apache Tribe of Mescalero Reservation; • Allowances, earnings, and payments to AmeriCorps participants under the National and Community Service Act of 1990; • Any allowance paid under the provisions of 38 U.S.C. 1805 to a child suffering from spina bifida who is the child of a Vietnam veteran; • Any amount of crime victim compensation (under the Victims of Crime Act) received through crime victim assistance (or payment or reimbursement of the cost of such assistance) as determined under the Victims of Crime Act because of the commission of a crime against the applicant under the Victims of Crime Act; and • Allowances, earnings, and payments to individuals participating in programs under the Workforce Investment Act of 1998.

Appendix 4: CHF Checklist and Forms

PARTICIPANT/CLIENT FILE CHECKLIST

All Participant Files Must Include (Section 1)

- ___ Screening/Intake Form (copy of HMIS Form)
- ___ Verification of Use of Coordinated Entry
- ___ Release of Information (copy of HMIS Form)
- ___ U.S. Identification (required for all household members-copy of government issued id, e.g. birth certificate, social security card, driver license, passport)
- ___ Staff Certification of Eligibility for Program
- ___ Verification of homelessness (CHF Form #1) and appropriate source documentation
- ___ Chronically Homeless Qualification Certification, if applicable
- ___ Case Notes (HMIS record of case management services)
- ___ Housing Stability Plan
- ___ Evidence of Referral to Mainstream Resources and/or Other Housing Programs
- ___ Denial Notice, if applicable
- ___ Written notice of program termination, if applicable

Rapid Rehousing/Rental Assistance Files Must include (Section 2)

- ___ Rapid Rehousing Eligibility Evaluation Form
- ___ Re-evaluations of Eligibility, if applicable
- ___ Income Documentation Form (with appropriate source documentation)
- ___ Habitability Standards Checklist
- ___ Rental Assistance Agreement
- ___ Rent Reasonableness Checklist and Certification
- ___ Habitability Standards Checklist
- ___ Lease Agreement
- ___ Certification of Receipt of Rapid Rehousing/Rental Assistance
- ___ Evidence of financial assistance (copy of checks, payment requests forms, financial documentation Form etc.)

If Lead Based Paint Requirements are applicable:

- ___ Verification of household receiving the pamphlet, *Protect Your Family from Lead in Your Home*
- ___ Lead Based Paint Property Owner Certification Form

List of Forms

Eligibility Documentation Forms

- CHF 1: Certification of Homeless Status
- CHF 2: CHF RRH/Rental Assistance Eligibility Evaluation Form
- CHF 3: Chronically Homeless Qualification Checklist
- CHF 4: Observation of Homeless Status by Outreach Worker or Intake Staff
- CHF 5: Self Declaration of Homeless Status
- CHF 6: Income Documentation Form
- CHF 7: Written Third Party Verification of Income
- CHF 8: Oral Third Party Verification of Income
- CHF 9: Self Declaration of Income

Property Forms

- CHF 10: Rental Assistance Agreement
- CHF 11: Rent Reasonableness Checklist and Certification
- CHF 12: Habitability Standards Checklist

Financial Management Forms

- CHF 13: Financial Assistance Documentation Form
- CHF 14: Request for Reimbursement Form
- CHF 15: Quarterly Report Form
- CHF 16: Budget Amendment Form