

HOME-ARP Supportive Services Grantee Workshop

MAY 4, 2023

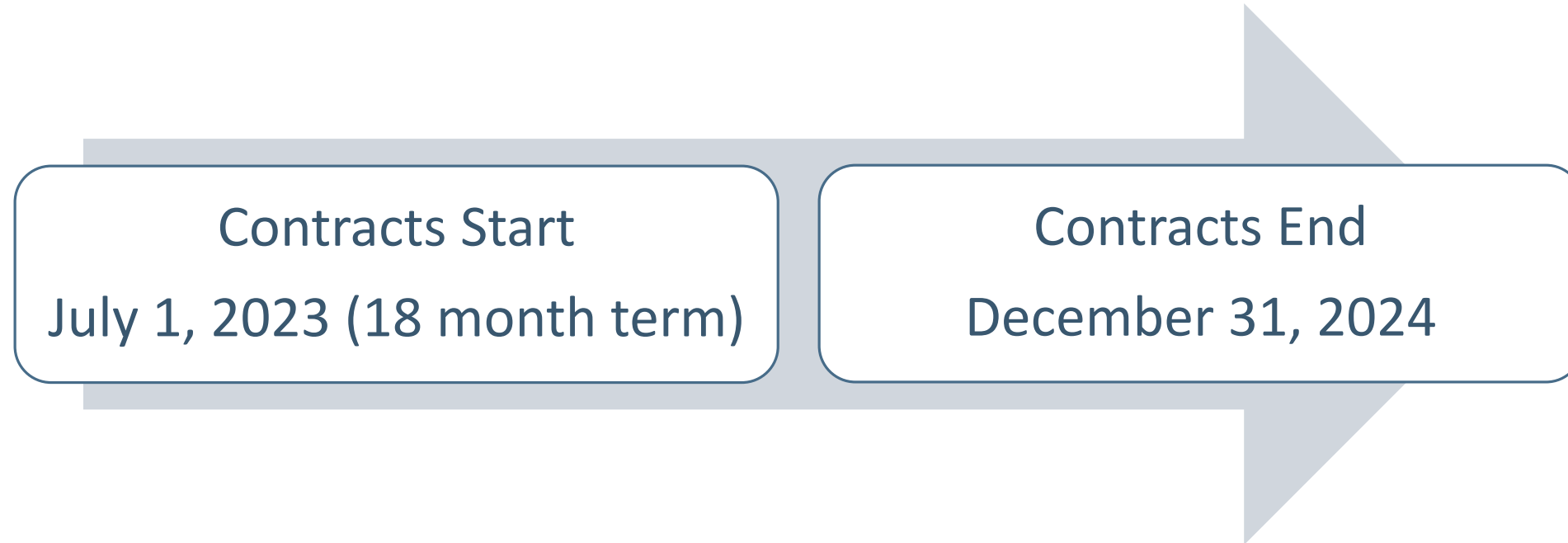
TN HOUSING DEVELOPMENT AGENCY

What is HOME-ARP Supportive Services?

The objectives of the HOME-ARP-SS Program are:

- Assist qualifying vulnerable individuals by providing them with services to regain stability quickly.
- Reduce the length of time experiencing homelessness.
- Obtain permanent housing.
- Limit returns to homelessness one year after exiting the Program.

Grant Term



- No program expenditures can be reimbursed before or after these dates. Administrative funds used for program start-up can be used beginning May 1st.
- Grant Closeout: Final reimbursement requests must be submitted within 45 business days from the end of the grant term or by February 14, 2025.

Agenda

Part 1: Eligible Participants & Services

Part 2: Program Requirements

Part 3: Participants

Part 4: Draw Process

Part 1: Eligible Participants & Services

Eligible Participants

- Based on Housing Status
 - Category 1 - Homeless
 - Category 2 - At risk of Homelessness (includes income requirement)
 - Category 3 - Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking
 - Category 4 - Other Populations (includes income requirement)
- 30% AMI income requirement for Category 2
- 30% or 50% AMI requirement for Category 4
- If a person is homeless, then the person is eligible to be provided the supportive services as McKinney-Vento supportive services
- If a person is housed, the supportive services are intended to help the program participant regain stability in the program participant's current permanent housing or move into other permanent housing to achieve stability in that housing, then the person is eligible for homelessness prevention services

Eligible Services under HOME-ARP-SS

1. McKinney-Vento Supportive Services
2. Homelessness Prevention Services
3. Housing Counseling Services
4. Administration

Eligible Costs for

1. McKinney Vento Supportive Services & 2. Homelessness Prevention Services

- Child care
- Education services
- Employment Assistance & Job training
- Food
- Housing Search & Counseling Services
- Legal Services
- Life skills training
- Mental Health services
- Outpatient health services
- Outreach services
- Substance abuse treatment services
- Transportation
- Case Management
- Mediation
- Credit Repair
- Landlord/Tenant Liaison
- Services for Special Populations
- Financial Assistance Costs
- Short-term & Medium-term Rental Assistance

Child Care

The costs of child care for program participants, including providing meals and snacks, and comprehensive and coordinated developmental activities, are eligible. The child care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible. The following conditions also apply:

- Children must be under the age of 13 unless the children have a disability.
- Children with a disability must be under the age of 18.

Education Services

The costs of improving knowledge and basic educational skills are eligible costs including:

- Instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED).
- Screening, assessment, and testing; individual or group instruction; tutoring; provision of books, supplies, and instructional material; counseling; and referral to community resources

Employment Assistance & Job Training

The costs of establishing and/or operating employment assistance and job training programs are eligible, including classroom, online and/or computer instruction, on-the-job instruction, services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of providing reasonable stipends to program participants in employment assistance and job training programs is also an eligible cost.

- Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.
- Services that assist individuals in securing employment consist of:
 - Employment screening, assessment, or testing;
 - Structured job skills and job-seeking skills;
 - Special training and tutoring, including literacy training and pre-vocational training;
 - Books and instructional material;
 - Counseling or job coaching; and
 - Referral to community resources

Food

- The cost of providing meals or groceries to program participants



Housing Search & Counseling Services

Costs of assisting eligible program participants to locate, obtain, and retain suitable housing.

- Services are:
 - Development of an action plan for locating housing;
 - Housing search;
 - Tenant counseling;
 - Securing utilities;
 - Making moving arrangements;
 - Outreach to and negotiation with owners;
 - Assistance submitting rental applications and understanding leases;
 - Assistance obtaining utilities; and
 - Tenant counseling;
- Mediation with property owners and landlords on behalf of eligible program participants;
- Credit counseling, accessing a free personal credit report, and resolving personal credit issues; and
- Payment of rental application fees;
- Assessment of housing for compliance with HOME-ARP requirements for TBRA assistance in Section VI.C of this Notice and financial assistance for short-term and medium-term rental payments provided under Section VI.D.4.c.i.(R) below;
- Other Housing counseling costs, as defined in 24 CFR 5.100, funded with or provided in connection with grant funds must be carried out in accordance with 24 CFR 5.111

Please Note: When grantees provide housing services to eligible persons that are incidental to a larger set of holistic case management services, these services do not meet the definition of Housing counseling, as defined in 24 CFR 5.100, and therefore are not required to be carried out in accordance with the certification requirements of 24 CFR 5.111.

Legal Services

Eligible costs are the fees charged by licensed attorneys and by person(s) under the supervision of licensed attorneys, for advice and representation in matters that interfere with a qualifying individual or family's ability to obtain and retain housing.

- Eligible subject matters are child support; guardianship; paternity; emancipation; legal separation; orders of protection and other legal remedies for victims of domestic violence, dating violence, sexual assault, human trafficking, and stalking; appeal of veterans and public benefit claim denials; landlord-tenant disputes; and the resolution of outstanding criminal warrants; landlord/tenant matters, provided that the services must be necessary to resolve a legal problem that prohibits the program participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which the program participant currently resides
- Services may include client intake, receiving and preparing cases for trial, provision of legal advice, representation at hearings, and counseling.
- Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the grantee's employees' salaries and other costs necessary to perform the services.

Ineligible Costs under Legal:

- Legal services for immigration and citizenship matters and for issues related to mortgages and homeownership are ineligible.
- Retainer fee arrangements and contingency fee arrangements are prohibited.

Life Skills Training

The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, dating violence, sexual assault, stalking, human trafficking, substance abuse, and homelessness are eligible. These services must be necessary to assist the program participant to function independently in the community.

Life skills training includes:

- Budgeting and money management
- Household management
- Conflict management
- Shopping for food and other needed items
- Nutrition
- The use of public transportation
- Parent training

Mental Health Services

Eligible costs are the direct outpatient treatment of mental health conditions that are provided by licensed professionals.

- Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances. Problem areas may include family and marital relationships, parent-child problems, or symptom management.
- Services are crisis interventions; counseling; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems

Outpatient Health Services

- Eligible costs are the direct outpatient treatment of medical conditions when provided by licensed medical professionals including:
 - Providing an analysis or assessment of a program participant's health problems and the development of a treatment plan;
 - Assisting program participants to understand their health needs;
 - Providing directly or assisting program participants to obtain and utilize appropriate medical treatment;
 - Preventive medical care and health maintenance services, including in-home health services and emergency medical services;
 - Provision of appropriate medication;
 - Providing follow-up services; and
 - Preventive and non-cosmetic dental care

Outreach Services

The costs of activities to engage qualified populations for the purpose of providing immediate support and intervention, as well as identifying potential program participants, are eligible.

- Outreach worker's transportation costs
- Cell phone bills of the individuals performing outreach
- Costs associated with the following services are eligible:
 - initial assessment
 - crisis counseling;
 - addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries;
 - actively connecting and providing people with information and referrals to homeless and mainstream programs; and
 - publicizing the availability of the housing and/or services provided within the grantee's geographic area.

Substance Abuse Treatment Services

Eligible substance abuse treatment services are designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors and are provided by licensed or certified professionals.

- The costs include:
 - Program participant intake and assessment;
 - Outpatient treatment;
 - Group and individual counseling
 - Drug testing;
- Ineligible Costs:
 - Inpatient detoxification
 - Inpatient drug or alcohol treatment



Transportation

- The costs of program participant's travel on public transportation or in a vehicle provided by the Grantee to and from medical care, employment, childcare, or other services eligible under this HOME-ARP;
- Mileage allowance for service workers to visit program participants and to carry out housing inspections;
- Leasing a vehicle in which staff transports program participants and/or staff serving program participants;
THDA IS NOT ALLOWING VEHICLE PURCHASES
- Gas, insurance, taxes, and maintenance for the vehicle;
- The costs of Grantee staff to accompany or assist program participants to utilize public transportation; and

Transportation Continued

- If public transportation options are not sufficient within the area, the Grantee may make a one-time payment on behalf of a program participant needing car repairs or maintenance required to operate a personal vehicle, subject to the following:
 - **Payments for car repairs or maintenance on behalf of the program participant may not exceed 10 percent of the Blue Book value of the vehicle (Blue Book refers to the guidebook that compiles and quotes prices for new and used automobiles and other vehicles of all makes, models, and types);**
 - **Payments for car repairs or maintenance must be paid by the Grantee or subrecipient directly to the third party that repairs or maintains the car; and**
 - **Grantees or subrecipients may require program participants to share in the cost of car repairs or maintenance as a condition of receiving assistance with car repairs or maintenance.**
- The Grantee must establish policies and procedures surrounding payments for the cost of gas, insurance, taxes, the one-time payment for car repairs or maintenance described above, and maintenance for vehicles of program participants. Such costs must be limited to program participants with the inability to pay for such costs and who, without such assistance, would not be able to participate in eligible services under this Section VI.D.4.c.i.

Case Management

The costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant(s) are eligible costs. Grantees and subrecipients providing these supportive services must have written standards for providing the assistance.

- Eligible costs are those associated with the following services and activities:
 - Conducting the initial evaluation, including verifying and documenting eligibility, for individuals and families applying for supportive services;
 - Counseling;
 - Developing, securing, and coordinating services;
 - Using a centralized or coordinated assessment system;
 - Obtaining Federal, State, and local benefits;
 - Monitoring and evaluating program participant progress;
 - Providing information and referrals to other providers;
 - Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking;
 - Developing an individualized housing and service plan, including planning a path to permanent housing stability; and
 - Conducting re-evaluations of the program participant's eligibility and the types and amounts of assistance the program participant needs.

Mediation Services

Costs of mediation is allowed if deemed necessary to prevent the program participant from losing permanent housing in which the program participant currently resides.

- Costs of for mediation between the program participant and the owner or person(s) with whom the program participant is living

Credit Repair

HOME-ARP funds may pay for credit counseling and other services necessary to assist program participants with critical skills.

Costs related to:

- household budgeting
- managing money
- accessing a free personal credit report
- resolving personal credit problems

Ineligible Cost:

- This assistance does not include the payment or modification of a debt

Landlord/Tenant Liaison Services

Costs of liaison services between property managers/owners and program participants.

- Costs and may include:
 - Landlord outreach;
 - Physical inspections and rent reasonable studies as needed to secure units;
 - Rental application fees and security deposits for clients;
 - Mediation services for housing issues that may arise between owner, property manager, or other residents and clients;
 - Coordination or assistance with the provision of other HOME-ARP eligible services to assist clients to maintain permanent housing.

Services for Special Populations

HOME-ARP funds may be used to provide services for special populations, such as victim services, so long as the costs of providing these services are eligible under this section.

- The term victim services means services that assist program participants who are victims of domestic violence, dating violence, sexual assault, stalking, or human trafficking including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, stalking, or human trafficking.

Financial Assistance

HOME-ARP funds may be used to pay housing owners, utility companies, and other third parties for the following costs, as applicable:

- Rental application fees fee that is charged by the owner to all applicants
- Security deposits
- Utility deposits
- Utility payments
- Moving costs
- First and Last month's rent
- Payment of rental arrears

Security Deposits

- A security deposit that is equal to no more than 2 months' rent.
- This assistance is separate and distinct from the provision of financial assistance for First and Last Month's rent provided under this section and cannot be used to duplicate those costs.



Utility Deposits & Payments

HOME-ARP funds may pay for a standard utility deposit, initiation fee required by the utility company or owner (if owner-paid utilities are provided) and/or utility payment for all program participants

- Participants are eligible for up to 24 months of utility payments per program participant, per service, including up to 6 months of utility payments in arrears, per service.
- No program participant shall receive more than 24 months of utility assistance within any 3-year period.
- A partial payment of a utility bill counts as one month.
- This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments.
- For the following utilities:
 - Gas
 - Electric
 - Water
 - Sewer



Moving Costs

HOME-ARP funds may pay for moving costs, such as:

- Truck rental
- Hiring a moving company

- This assistance may include payment of temporary storage fees for up to 3 months,
 - Fees must be accrued after the date the program participant begins receiving assistance and before the program participant moves into permanent housing

- Ineligible costs:
 - Payment of temporary storage fees in arrears is not eligible

First & Last Month's Rent

HOME-ARP funds may be used to make a pre-payment of the first and last month's rent under a new lease to the owner at the time the owner is paid the security deposit for the program participant's tenancy in the housing and must follow these provisions:

- Must be necessary to obtain housing for a program participant,
- This payment must not exceed two month's rent and must be tracked for purposes of determining the total short- and medium-term financial assistance for rent that the program participant may receive.
- This assistance is separate and distinct from financial assistance for Security Deposits provided under this section and cannot be used to duplicate those costs.

Rental Arrears

HOME-ARP funds may be used for a one-time payment for rent in arrears to either maintain their existing housing or, for those without housing, to remove a demonstrated barrier to obtaining housing.

- This includes any late fees or charges on those arrears
- Max assistance is up to 6 months of arrears
- Must be paid directly to third party



Short-term & Medium Term Rental Assistance

HOME-ARP funds may provide a program participant with short-term (up to 3 months) or medium-term (more than 3-24 months) financial assistance for rent under these rental provisions:

- Total financial assistance provided, including any pre-payment of first and last month's rent as described above, cannot exceed 24 months of rental payments over any 3-year period.
- The Grantee may only make rental payments to an owner with whom the Grantee has entered into a Financial Assistance Agreement with.
- The Grantee is solely responsible for paying late payment penalties if incurred during period of Financial Assistance Agreement.
- Rental payments cannot exceed Fair Market Rent established by HUD, and must comply with HUD's standard of rent reasonableness.
- Each program participant receiving financial assistance for rental payments must have a legally binding, written lease for the rental unit, unless the assistance is solely for rental arrears.
- If a program participant receiving financial assistance for short- or medium-term rental payments under this section meets the conditions for an emergency transfer under 24 CFR 5.2005(e), HOME-ARP funds may be used to pay amounts owed for breaking a lease to effectuate an emergency transfer. These costs are not subject to the 24-month limit on rental payments.
- **Ineligible costs:**
 - Financial assistance cannot be provided to a program participant who is receiving the same type of assistance through other public sources. Financial assistance also cannot be provided to a program participant who has been provided with replacement housing payments under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 USC 4601 et seq.) and its implementing regulations at 49 CFR part 24, or Section 104(d) of the Housing and Community Development Act of 1974 (42 USC 5304(d) and its implementing regulations at 24 CFR part 42, during the period of time covered by the replacement housing payments.

Additional Ineligible Costs

- Mortgage loan payments
- Pet deposits
- Late fees incurred because Grantee did not pay agreed rental subsidy by agreed date
- Payment of temporary storage fees in arrears
- Payment of past debt not related to rent or utility
- Financial assistance to participants who are receiving the same type of assistance through other public sources or to a Program participant who has been provided with replacement housing payments under URA during the same time period.
- Any ineligible costs paid using HOME-ARP funds must be repaid

HOME-ARP- ESG Crosswalk

HOME-ARP Supportive Services	ESG Street Outreach
<p>Outreach services are eligible in HOME-ARP as a supportive service VI.D.4.J. Covered costs include staffing (salaries, travel, and cellphones); direct services such as crisis management, information and referral, and the cost of food, blankets, and hygiene kits. Supportive services under HOME-ARP also includes mental health services under VI.D.4.H and outpatient health services under VI.D.4.I.</p>	<p>ESG-funded street outreach includes activities to engage individuals experiencing unsheltered homelessness, provide support for basic needs, and connect individuals to services and housing.</p> <p>Services consist of engagement, case management, emergency health services, emergency mental health services, specific transportation costs, and services for special populations.</p> <p>Eligible activity under ESG (§ 576.101).</p>
HOME-ARP Non-Congregate Shelter	ESG Emergency Shelter
<p>A HOME_ ARP Non-congregate Shelter (NCS) is one or more buildings that provide private units or rooms as temporary shelter to individuals and families and do not require occupants to sign a lease or occupancy agreement. See CPD-21-10 for more details on NCS.</p> <p>HOME-ARP funds may not be used to pay the operating costs of HOME-ARP NCS.</p>	<p>Emergency shelter is a short-term shelter for literally homeless individuals and families to meet their urgent safety needs. Emergency shelter can be congregate or non-congregate.</p> <p>Domestic violence shelters are short-term interim shelter options designed to meet the additional needs of persons fleeing an abusive situation.</p> <p>Eligible activity under ESG (§ 576.102).</p>

HOME-ARP- ESG Crosswalk

HOME-ARP Supportive Services	ESG Homeless Prevention
<p>HOME-ARP funds may be used to provide a broad range of supportive services to qualifying individuals or families as a separate activity or in combination with other HOME-ARP projects and activities.</p> <p>The HOME-ARP Supportive Services eligible activity combines and adapts support services concepts and eligible activities from the ESG and CoC regulations, including HOME-ARP Homelessness Prevention Services that were adapted from eligible homelessness prevention services under the ESG regulations at 24 CFR 576.102, 24 CFR 576.103, 24 CFR 576.105, and 24 CFR 576.106 and were revised, supplemented, and streamlined in Section VI.D.4.c.i of CPD-21-10.</p> <p>Likewise, McKinney-Vento Supportive Services under HOME-ARP were adapted from the services listed in Section 401(29) of McKinney-Vento.</p> <p>These eligible services include housing-related services: (1) short-term and medium-term financial assistance for rent, rental arrears, rental application fees, security deposits, advance payment of first and last months' rent, utility deposits and payments, and moving costs; (2) housing support including landlord/tenant liaison costs, mediation, legal services, and credit repair; (3) income stabilization services including life skills training, child care, transportation, food, employment assistance and job training, and education services; and (4) health services including mental health, outpatient, and substance abuse treatment.</p> <p>HOME-ARP supportive services also include services for special populations if the cost of providing the services is eligible under section VI.D of CPD-21-10.</p>	<p>As defined in the ESG regulations, homeless prevention activities are designed to prevent an individual or family from becoming homeless.</p> <p>Eligible services and assistance include short-term and medium-term tenant-based or project-based rental assistance, rental arrears, rental application fees, security deposits, advance payment of last month's rent, utility deposits and payments, moving costs, housing search and placement, housing stability case management, mediation, legal services, and credit repair.</p> <p>Eligible activity under ESG (§ 576.103).</p> <p>For the CoC program, the service provider must be part of a CoC that has been designated by HUD as a High Performing Community (HPC). Not all CoCs qualify or choose to apply for this designation. To qualify as an HPC, a CoC must demonstrate through reliable data generated by HMIS that it meets set standards outlined in Subpart E of 24 CFR part 578.</p>

Eligible Costs for

3. Housing Counseling Services

Housing counseling services under HOME-ARP is independent, expert advice customized to the need of the consumer to address the consumer's housing barriers and to help achieve their housing goals and must include the following processes: **Intake; financial and housing affordability analysis; an action plan, except for reverse mortgage counseling; and a reasonable effort to have follow-up communication with the client when possible.** The content and process of housing counseling must meet the standards outlined in [24 CFR part 214](#).

- Eligible costs include, but are not limited to:
 - Staff salaries and overhead costs of **HUD-certified housing counseling agencies** related to directly providing eligible housing counseling services to HOME-ARP program participants
 - Development of a housing counseling work plan
 - Marketing and outreach
 - Intake
 - Financial and housing affordability analysis
 - Action plans that outline what the housing counseling agency and the client will do to meet the client's housing goals and that address the client's housing problem(s)
 - Follow-up communication with program participants
 - Homeownership counseling
 - Rental Counseling

Eligible Costs for

4. Administration

- Each successful applicant may request up to ten percent (10%) of its award for Administrative Costs.
- Reasonable costs of overall HOME-ARP program management, coordination, monitoring, and evaluation. Costs include but are not limited to:
 - Salary and benefit packages of the grantee and subrecipient staff who directly deliver the services and/or administration assignments
 - Administrative services performed under third party contracts or agreements, including such services as general legal services, accounting services, and audit services
 - Other costs for goods and services required for administering the HOME-ARP program, such as: rental or purchase of equipment, insurance, **HMIS or other systems necessary to track activities**, utilities, office supplies, and rental and maintenance
 - Indirect costs may be charged under a cost allocation plan prepared in accordance with 2 CFR part 200, subpart E

Ineligible Costs for Administration

- Purchase of office space
- Salaries and benefits of staff not working directly under HOME-ARP-SS
- Funds must be gradually dispersed as it is meant to assist in administering the grant for the duration of the grant term

Part 2: Program Requirements

Policies and Procedures

Grantees must establish the following policies and procedures and submit them to THDA:

- Tenant selection procedures for new referrals
- Length of time that program participants may be served HOME ARP rental housing before they will no longer be eligible as a qualifying population
- Maximum amounts and/or maximum periods for assistance or services, the maximum dollar amount that a program participant may receive for each eligible service and/or maximum periods for which a program participant may receive any of the types of assistance or services under this section
- Documentation of eligible costs
- Requirements that allow a program participant to receive HOME-ARP services only if necessary to prevent duplication of services or assistance in the use of HOME-ARP funds for supportive services
- Payments for the cost of gas, insurance, taxes, the one-time payment for car repairs or maintenance described above, and maintenance for vehicles of program participants
- Financial assistance for short-term and medium-term rental payments, including requirements to prevent a duplication of rental or financial assistance provided to a program participant
- Housing stability case management
- Termination of assistance to program participants

Non-Discrimination & Equal Opportunity

- Grantees must make facilities and services available to all on a nondiscriminatory basis to persons with disabilities, persons of any particular race, color, religion, sex, age, familial status, or national origin.
- Grantee should establish additional procedures that will ensure that these persons are made aware of the facilities and services within their service area who may qualify for them.
- Grantees must adopt procedures to disseminate information to anyone who is interested regarding the existence and location of services or facilities that are accessible to individuals with disabilities.
- Grantees must also comply with the requirements of 24 CFR Parts 5, 200, 203, et al Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity.
 - The regulation is available at [Federal Register :: Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity](#)
- Grantees should include in their HOME-ARP-SS Program standards a written policy for Fair Housing to all persons and/or families regardless of sexual orientation, gender identity or family identification.

Property Management Standards

- Grantees are required to follow uniform standards for using and disposing of capital improvements and equipment.
- Equipment is defined as having a useful life of one year and a per unit value of \$5,000 or more.
- Each HOME-ARP-SS Program Grantee must have an appropriate procurement procedure in place.
 - At a minimum, three telephone bids must be obtained for any equipment or furniture purchases to be charged totally or in part to HOME-ARP-SS PROGRAM.
- Equipment log must be kept for equipment purchased with HOME-ARP-SS funding.

Environmental Review

- The environmental effects of each activity must be assessed in accordance with the provisions of the National Environment Policy Act of 1969 (NEPA) and the related authorities listed in HUD's regulations at 24 CFR Part 58.
- THDA as the Responsible Entity and the units of local government funded by THDA will be responsible for carrying out environmental reviews.
- The Grantees are responsible for gathering the information required for the environmental reviews.
- Funds cannot be committed until the environmental review process has been completed. Commitments for expenditures made prior to the approval of the environmental review cannot be reimbursed or advanced with HOME-ARP-SS PROGRAM funds.

Conflict of Interest

- Each HOME-ARP-SS Program Grantee must adopt a conflict of interest policy.
- It must prohibit any employee, persons with decision making positions or having information about decisions made by an organization, from obtaining a personal or financial interest or benefit from the organization's activity, including through contracts, subcontracts, or agreements. (24 CFR 576.57).

Confidentiality

- All records containing personally identifying information of any individual or family who applies for and/or receives HOME-ARP assistance will be kept secure and confidential
- Grantees must develop procedures to ensure the confidentiality of victims of domestic violence

Drug & Alcohol-Free Facilities

- Grantees must administer a policy designed to ensure that each assisted homeless facility is free from the illegal use, possession or distribution of drugs or alcohol.

Client Participation

- Grantees must involve the homeless individuals and families in the maintenance and operation of facilities, and in the provision of services to residents of these facilities to the maximum extent possible.
- The involvement of homeless persons is required through the Housing and Community Development Act of 1992.

Fair Housing

- Grantees must perform and document action in the area of enforcement and/or promotion to affirmatively further fair housing.
- During the grant year Grantees must carry out a minimum of one activity to promote fair housing.



Terminating Assistance

- All HOME-ARP-SS Program Grantees must establish policies and procedures for termination of assistance to program participants.
- In terminating assistance, the Grantee must provide a formal process that recognizes the rights of individuals receiving assistance under the due process of law. This process, at a minimum, must consist of:
 - Providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance.
 - Written notice to the program participant containing a clear statement of the reasons for termination.
 - A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision.
 - Prompt written notice of the final decision to the program participant. During this process, the grantee must provide effective communication and accessibility for individuals with disabilities, including the provision of reasonable accommodations.
- Similarly, the grantee must provide meaningful access to persons with disabilities and LEP.

Reporting Requirements

- Each HOME-ARP-SS Program Grantee must complete quarterly reporting forms.
- Quarterly reports must be submitted by the 15th of the month following the close of the quarter.
 - If the 15th falls on a weekend or holiday, the report must be submitted by the next business day.
- Additional reports may be required by THDA at its sole and absolute discretion.

Reporting Requirements

HOME-ARP Quarterly Report										May 1, 2023-July 31, 2023				
Supportive Services → Homeless Households														
Total	New Households	Veteran	Hispanic	Race								Native hawaiian/Pacific Islander	Other/Multi-Racial	
				White	Black	Asian	American Indian/Alaskan Native							
1	2	3	Household Size					Household Type						
			4	5	6	7	8+	Single, non-elderly	Elderly	Single Parent	Two Parents	Other		
Remarks														
Supportive Services → Non-Homeless Households														
Total	New Households	Veteran	Hispanic	Race								Native hawaiian/Pacific	Other/Multi-Racial	
				White	Black	Asian	American Indian/Alaskan Native							
1	2	3	Household Size					Household Type						
			4	5	6	7	8+	Single, non-elderly	Elderly	Single Parent	Two Parents	Other		
Remarks														

Serving Families With Children

- Organizations that use HOME-ARP-SS Program funds for emergency shelter to families with children under the age of 18 shall not deny admission to any family based on the age of any child under age 18.
- Providing these families with stays in a hotel/motel or other off-site facility does not suffice.
- If the Grantee's facility serves families, provisions must be made for the facility to accommodate all families.

Violence Against Women Act (VAWA)

- All HOME-ARP-SS Program Grantees are required to apply the requirements of the Violence Against Women Act to all victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation, consistently across all HUD administered Programs along with all nondiscrimination and fair housing requirements.

Program Record Requirements for McKinney-Vento & Homelessness Prevention Supportive Services

- Records showing compliance with termination of assistance requirements with participants who have been terminated from services.
- Records of all solicitations of and agreements with subrecipients and contractors, records of all payment requests by and dates of payments made to subrecipients.
- Records of all procurement contracts and documentation of compliance with the procurement requirements in 2 CFR part 200, subpart D, as revised by Section VIII.D of this Notice.
- Records evidencing the use of the written procedures put in place by the Grantee for new referrals for services (in Section VI.D.2) and records evidencing that such participants are eligible for services are given services on a non-discriminatory basis and used one of the outlined referral methods in Section IV.C.2 (use of CE, CoC or waiting lists).
- Records of all leases, subleases, and financial assistance agreements for the provision of rental payments, documentation of payments made by the Grantee on behalf of the participant and supporting documentation for these payments, including dates of occupancy by qualifying individuals and families.
- Records that document the monthly allowance for utilities (excluding telephone) used to determine compliance with the rent restriction.
- Records of the types of services provided under the Grantee's program and the amounts spent on these services.

Program Record Requirements for Housing Counseling Services

- Each participating housing counseling agency must maintain a recordkeeping and reporting system in accordance with 24 CFR 214.315 and 24 CFR 214.317.
- The system must permit HUD to easily access all information needed for a performance review.

Financial Records

- Records identifying the source and application of HOME-ARP funds. Identification must include, as applicable:
 - The Assistance Listing program title and number (formerly Catalogue of Federal Domestic Assistance),
 - Federal award identification number and year,
 - Name of the Federal agency, and
 - Name of the pass-through entity, if any.
- Records identifying the source and application of program income and repayments.
- Records demonstrating adequate budget control and other records required by 2 CFR 200.302, including evidence of periodic account reconciliations

Period of Record Retention

- All records pertaining to HOME-ARP funds must be retained for **five years**, except as provided below:
 - For HOME-ARP rental housing projects, records may be retained for five years after the project completion date; except that records of individual tenant income verifications, project rents and project inspections must be retained for the most recent five-year period, until five years after the affordability period terminates.
 - For HOME-ARP TBRA projects, records must be retained for five years after the period of rental assistance terminates.
 - Written agreements must be retained for five years after the agreement terminates.
 - Records covering displacements and acquisition must be retained for five years after the date by which all persons displaced from the property and all persons whose property is acquired for the project have received the final payment to which they are entitled in accordance with 24 CFR 92.353.
 - If any litigation, claim, negotiation, audit, monitoring, inspection, or other action has been started before the expiration of the required record retention period records must be retained until completion of the action and resolution of all issues which arise from it, or until the end of the required period, whichever is later.

Program Compliance

- Failure to maintain compliance with any Program funded through Community Programs will result, depending on the egregiousness of the noncompliance, in penalties being assessed in the scoring of future applications and/or the inability to participate in Programs administered by THDA for a period to be determined at THDA's sole discretion.
- Please contact THDA if you feel compliance is not being met.
- Failure to report the error to THDA in a timely manner may result in a finding during monitoring.

Part 3: Participants

Preferences and Limitations

- Preferences are used to establish the order in which applicants are admitted to housing or shelter or provided with services.
- A preference provides a priority in the selection of applicants for a project or activity among QPs (e.g., homeless QP) or who are in a specific category/subpopulation within a QP (e.g., elderly or persons with disabilities within one or more QPs).
- A preference permits an eligible QP applicant that qualifies for a grantee-adopted preference to be selected for HOME-ARP assistance before another eligible QP applicant that does not qualify for a preference. A preference is not a limitation (i.e., does not exclude an individual or household that qualifies under any of the four QP definitions from applying for the HOME-ARP project or activity).
- A method of prioritization is the process by which a PJ, Continuum of Care (CoC) Coordinated Entry (CE), subrecipient, or project owner determines how two or more eligible QP applicants qualifying for the same or different preferences are selected for HOME-ARP assistance.

Example

- Example: A grantee adopts a **preference for chronically homeless** individuals and families for a HOME ARP rental project. The preference gives chronically homeless QP applicants priority for admission to the project. All other eligible QP applicants (including homeless QP applicants who do not qualify as chronically homeless) are selected in chronological order for any units not occupied by chronically homeless QP applicants. Chronically homeless QP applicants are **prioritized** for admission for occupancy based on length of time they have been homeless.
- In the example, the grantee-adopted preference for chronically homeless requires eligible QP applicants who are chronically homeless to be selected before eligible QP applicants who do not qualify as chronically homeless. The grantee-adopted method of prioritization within the chronically homeless preference requires chronically homeless applicants to be selected in order based on length of homelessness.

Preferences: Implementation

1. Projects or activities that will target assistance to a certain QP (e.g., homeless QP) or subpopulations (e.g., veterans in the homeless QP) before serving other QPs.
 - A HOME-ARP non-congregate shelter (NCS) that prioritizes admission of individuals or households in the homeless QP or domestic violence/sexual assault/trafficking QP over the other QPs (i.e., at risk of homelessness and other populations). Members of all four QPs are eligible to apply for and be admitted to the NCS.
 - A HOME-ARP supportive services activity prioritizes homeless veterans (a subpopulation of the Homeless QP) over those in the Homeless QP who are not veterans and those in the other QPs.
2. Referral methods that prioritize certain QPs or subpopulations of a QP.
 - A grantee enters into a written agreement with the local CoC to use its CE system to accept applicants from all QPs for its HOME-ARP projects and activities. The CE selects individuals and families in the homeless QP for referrals for HOME-ARP assistance before other QPs, in accordance with its written agreement with the grantee.

Preferences Cont.

- If a grantee establishes preferences, it must ensure that those preferences comply with the requirements in Section IV.C.1 of the Notice (pages 9-10), including:
 - Grantees must comply with all applicable fair housing, civil rights, and nondiscrimination requirements, (e.g., Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and Americans with Disabilities Act).
 - Grantees may provide a preference for a specific category of individuals with disabilities (e.g., persons with HIV/AIDS or chronic mental illness) within the QP only if the preference complies with 24 CFR 8.4 and is needed to address a greater gap in benefits and services received by such persons in the grantee's geographic area. The grantee must identify and describe the specific category and how it addresses the greater unmet need in its HOME-ARP allocation plan.

No Preferences?

- If a grantee does not identify preferences its HOME-ARP program will serve individuals and families from all QPs in all of its projects or activities and will use project- or activity-specific waiting lists.
- If using project or activity-specific waiting lists, applicants for HOME-ARP projects or activities must be selected in **chronological order** of their application to the greatest extent practicable, without the use of any preference or method of prioritization being employed.
- Consequently, by not establishing preferences, the grantee limits its option to use the CE as a referral method (i.e., a CE can only refer clients for placement on HOME-ARP project- or activity-waiting lists, and those clients are subject to the requirement for selection in chronological order).

Limitations

- Unlike a grantee's adoption of one or more preferences which establish priorities among QPs or for subpopulations of QPs, limitations exclude certain QPs or subpopulations of QPs from eligibility for a project or activity. Examples of limitations include:
 - **A HOME-ARP non-congregate shelter (NCS) will limit admission to individuals or families that qualify under the domestic violence/sexual assault/trafficking QP.**
 - A HOME-ARP rental project will limit occupancy to homeless veterans, a subpopulation of the homeless QP.
 - A PJ issues a HOME-ARP NOFO that will only fund projects that will exclusively serve individuals or families that are members of the homeless QP.

Limitations Cont.

- Limitations on eligibility for a HOME-ARP project or activity may cause unintended violations of fair housing, civil rights, and nondiscrimination requirements or HOME-ARP statute. Consequently, grantees should not impose a limitation on eligibility unless it is necessary to address a greater gap in effective housing, aid, benefit, or services in the grantee's geographic area and the HOME-ARP project or activity cannot address the gap through the use of a preference.

Coordinated Entry (CE)

- If a grantee will be using a CE for direct referrals to its HOME-ARP projects and activities, the CE must be expanded to accept all four QPs, as defined in the Notice.
- If the CE is not expanded to accept all four QPs, the project or activity will be required to use other referral methods, as described in Section IV.C.2.ii (page 11). The grantee must also use referral methods other than a CE if any of the other conditions described in Section IV.C.2.i. (page 11) occur.
- In the CoC CE, “prioritization” refers to the CE-specific process by which all persons in need of assistance are ranked in order of priority. A CoC establishes CE prioritization policies to ensure, to the maximum extent feasible, that people with more severe service needs and levels of vulnerability are prioritized for housing and assistance before those with less severe service needs and lower levels of vulnerability. (See Notice CPD-16-01 and CPD Notice-17-01). This CE prioritization constitutes the use of preferences and therefore if a grantee uses a CE for direct referrals, the CE must also comply with HOME-ARP requirements (e.g., not exclude any of the four HOME-ARP QPs, use only those preferences and method of prioritization adopted by the grantee, and include the preferences and prioritization used by the CE in the PJ’s allocation plan).
- Further, because a grantee may want to establish different prioritization for HOME-ARP than what the CoC is currently implementing for the CE, the grantee and CoC must enter into a written agreement requiring that the CE comply with only grantee-adopted preferences and method of prioritization for HOME-ARP referrals.

What this means

- If a grantee intends on using either a preference or limitation it must be approved by THDA.
- THDA may approve a limitation at the project level only if the grant recipient demonstrates that:
 1. The limitation is necessary to address an unmet need or gap in effective housing or services in the grantee's jurisdiction.
 2. The grantee has demonstrated that the identified assistance gap cannot be addressed using a preference.
 3. The needs of the QP or subpopulation of a QP have been supported in THDA's Allocation Plan as data is available.
 4. THDA determines that other HOME-ARP projects will provide access to HOME-ARP resources for the excluded QPs or subpopulations of a QP.

Participant Files

All files need to verify compliance with program & include the following:

- Verification of Homelessness or Housing Status
- Verification of below 30% AMI (At Risk of Homelessness & Other Populations ONLY)
- Show that all rental provisions are met *if* rental assistance is provided
 - Lease
 - Financial Assistance Agreement
 - FMR & Rent Reasonable
 - Habitability Standards
- “How to Protect your Family from Lead” pamphlet
- Fair Housing Brochure
- Grievance and Termination Policies
- All financial assistance is documented with invoice and proof of payment
- Case Notes that document client progress towards goals
- Due process of participant’s termination of services or successful exit

Verification of Housing Status

- The order of priority for obtaining evidence of homelessness is as follows:

1. Third-party documentation

2. Intake worker observations

3. Certification from the person seeking assistance

- If third-party documentation cannot be obtained, intake worker needs to document record of due diligence of attempt to obtain documentation

1. Homeless Definition

Category 1 - Homeless

(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);
- (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;
- (ii) No subsequent residence has been identified; and
- (iii) 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:

- (i) 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);
- (ii) 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;
- (iii) 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
- (iv) 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

Documentation for Homeless Category 1

Documentation must include all from one of the following:

For individuals or families who lack a fixed, regular, and adequate nighttime residence:

- Written referral by another housing or service provider OR
- Written observation by the outreach worker OR
- Certification by the individual or head of household seeking assistance stating that they were living on the streets or in a shelter

For individuals or family who will imminently lose their primary nighttime residence:

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

2. At Risk of Homelessness Definition

Category 2 - At Risk of Homelessness

(1) An individual or family who:

- (i) Has an annual income below 30% of median family income for the area, as determined by HUD;
- (ii) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “Homeless” definition in this section; **and**

(iii) Meets one of the following conditions:

- (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
- (B) Is living in the home of another because of economic hardship;
- (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
- (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;
- (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;
- (F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
- (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;

(2) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless”

under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(l) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(l)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15));

(3) A child or youth who does not qualify as “homeless” under this section but qualifies as “homeless”

under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him

Documentation for At Risk of Homelessness Category 2

Documentation must include one of the following:

- A court order resulting from an eviction notifying the individual that they must leave OR
- For individuals leaving a hotel or motel evidence that they lack the financial resources to stay OR
- A documented and verified oral statement from participant of housing loss

AND:

- Documentation that annual income is under 30% AMI

AND one of the following:

- Certification that no subsequent residence has been identified, AND Source documentation that the individual lacks the financial resources and support necessary to obtain permanent housing (notice of termination from employment, unemployment compensation statement, bank statement, health-care bill showing arrears, utility bill showing arrears), OR
- Written documentation from a relevant third-party (former employer, public administrator, relative) OR
- Record of due diligence from intake worker to obtain third-party documentation as well as a Self-Certification from participant of annual income



3. Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking Definition

Category 3 - Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

Domestic violence

which is defined in 24 CFR 5.2003 includes felony or misdemeanor crimes of violence committed by:

- 1) A current or former spouse or intimate partner of the victim (the term "spouse or intimate partner of the victim" includes a person who is or has been in a social relationship of a romantic or intimate nature with the victim, as determined by the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship);
- 2) A person with whom the victim shares a child in common;
- 3) A person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner;
- 4) A person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving HOME-ARP funds; or
- 5) Any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

Dating violence

which is defined in 24 CFR 5.2003 means violence committed by a person:

- 1) Who is or has been in a social relationship of a romantic or intimate nature with the victim; and
- 2) Where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - a. The length of the relationship;
 - b. The type of relationship; and
 - c. The frequency of interaction between the persons involved in the relationship.

Sexual assault

which is defined in 24 CFR 5.2003 means any nonconsensual sexual act proscribed by Federal, Tribal, or State law, including when the victim lacks capacity to consent.

Stalking

which is defined in 24 CFR 5.2003 means engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

- 1) Fear for the person's individual safety or the safety of others; or
- 2) Suffer substantial emotional distress.

Human Trafficking

includes both sex and labor trafficking, as outlined in the Trafficking Victims Protection Act of 2000 (TVPA), as amended (22 U.S.C. 7102). These are defined as:

- 1) Sex trafficking means the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose of a commercial sex act, in which the commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or
- 2) Labor trafficking means the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.



Documentation of Homelessness for Families Fleeing Domestic Violence Category 3

Documentation must include all from one of the following:

For Victim Service Providers:

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

For Non-Victim Service Providers:

- An oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. *Where the safety of the individual or family is not jeopardized* the oral statement must be verified **AND**
- Certification by the individual or head of household that no subsequent residence has been identified **AND**
- Self-certification or other written documentation that the individual or family lacks the financial support networks to obtain other housing

4. Other Populations Definition

Category 4 - Other Populations

Other Families Requiring Services or Housing Assistance to Prevent Homelessness

is defined as households (i.e., individuals and families) who have previously been qualified as “homeless” as defined in 24 CFR 91.5, are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed, and who need additional housing assistance or supportive services to avoid a return to homelessness.

At Greatest Risk of Housing Instability

is defined as household who meets either paragraph (i) or (ii) below:

- (i) has annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs);
- (ii) has annual income that is less than or equal to 50% of the area median income, as determined by HUD, AND meets one of the following conditions from paragraph (iii) of the “At risk of homelessness” definition established at 24 CFR 91.5:
 - (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - (B) Is living in the home of another because of economic hardship;
 - (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
 - (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;
 - (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;
 - (F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
 - (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan



Documentation of Homelessness for Other Populations Category 4

Documentation must include all from one of the following:

- Documentation from third-party source that family was previously homeless
- Documentation from third-party source of housing instability

OR

- Proof that income is less than 30% AMI; and
- Proof that family is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs)

OR

- Proof that income is less than 50% AMI
- A court order resulting from an eviction notifying the individual that they must leave OR For individuals leaving a hotel or motel evidence that they lack the financial resources to stay

OR

- A documented and verified oral statement from participant of housing loss AND
- Certification that no subsequent residence has been identified, AND
- Source documentation that the individual lacks the financial resources and support necessary to obtain permanent housing (notice of termination from employment, unemployment compensation statement, bank statement, health-care bill showing arrears, utility bill showing arrears),

OR

- Written documentation from a relevant third-party (former employer, public administrator, relative) **OR**
- Record of due diligence from intake worker to obtain third-party documentation as well as a Self-Certification from participant

Verification of Income Status

- Required for “At Risk of Homelessness” and “Other Populations” housing categories
- Files must include:
 - Income evaluation form containing the minimum requirements specified by HUD and completed by Grantee
 - Supporting documentation obtained in the following order:
 1. Third-party documentation - Source documents for the assets held by the household 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). To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., employer, government benefits administrator). If this cannot be obtained,
 2. Intake worker observations - The written certification by the intake staff of the oral verification by the relevant third party of the income the household received over the most recent period for which representative data is available. *This statement must also include intake worker’s record of due diligence of attempt to obtain documentation.*
 3. Certification from the person seeking assistance - To the extent that source documents and third-party verification are unobtainable, the written certification by the household of the amount of income the household received for the most recent period representative of the income that the household is reasonably expected to receive over the 3-month period following the evaluation.

Rental Provision: Lease Agreement

- A written lease is required for all program participants receiving rental assistance.
- The lease must be between the owner and the program participant.
- Where the financial assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease, if the agreement gives the program participant an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented by the owner's financial records, rent ledgers, or canceled checks.
- New leases must have an initial term of 1 year unless a shorter period is agreed upon by the program participant and owner. The lease requirements in 24 CFR 92.359 apply to this financial assistance.
- Grantee must document efforts to obtain a written lease.
- If a written lease does not exist and/or cannot be adequately documented, a new written lease must be executed and documented in the case file before any rental assistance is provided.

Rental Provision: Financial Assistance Agreement

- The financial assistance agreement must set forth the terms under which rental payments will be provided.
- The financial assistance agreement must provide that, during the term of the agreement, the owner must give the Grantee a copy of any notice to the program participant to vacate the housing unit or any complaint used under State or local law to commence an eviction action against the program participant.
- The owner must serve written notice upon the program participant at least 30 days before termination of tenancy specifying the grounds for the action.
- The Grantee must make timely payments to each owner in accordance with the financial assistance agreement. HOME-ARP-SS funds cannot reimburse for pay fees incurred by mistake of the Grantee. The financial assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease.
- Written agreement between landlord and agency includes:
 1. Client name and address of unit
 2. Amount to be paid
 3. Landlord's agreement to accept payment on behalf of client
 4. Length of assistance
 5. Release of liability for further assistance

Rental Provision: Fair Market Rent (FMR) & Rent Reasonable

Rental payments cannot be provided if:

- Rent of unit exceeds the Fair Market Rent established by HUD.
- Rent does not meet HUD's standard of rent reasonableness.

Fair Market Rent

- Fair Market Rent is the maximum amount a HOME-ARP participant may pay for a rental unit.
- FMR is established by HUD for each county or city and the link is posted on our website under HUD Rent Limits.
- To calculate FMR clients Rent + Utility Allowance less than or equal to the FMR for your area.

Rent Reasonable

- Must obtain 3 comparable rental units to determine reasonability for both Homelessness Prevention and Rapid Rehousing. Documentation must be kept in the participant's file.
- Grantee may use real estate listings, phone inquiries, or TNHousingSearch.org to find comparable units.

Rental Provision: Habitability Standards

- Prior to occupancy units must meet minimum Habitability Standards
- Habitability Inspection must be included in participant file

Rental Provision: Habitability Inspection

<p>(1) Structure and materials.</p>	<p>(2) Space and security.</p>	<p>(3) Interior air quality.</p>	<p>(4) Water supply.</p>	<p>(5) Sanitary facilities.</p>	<p>(6) Thermal environment.</p>	<p>(7) Illumination and electricity.</p>	<p>(8) Food preparation.</p>	<p>(9) Sanitary conditions.</p>
<ul style="list-style-type: none"> •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. 	<ul style="list-style-type: none"> •Each resident must be provided adequate space and security for themselves and their belongings. Each resident must be provided an acceptable place to sleep. 	<ul style="list-style-type: none"> •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. 	<ul style="list-style-type: none"> •The water supply must be free from contamination . 	<ul style="list-style-type: none"> •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. 	<ul style="list-style-type: none"> •The housing must have any necessary heating/cooling facilities in proper operating condition. 	<ul style="list-style-type: none"> •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. 	<ul style="list-style-type: none"> •All food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner. 	<ul style="list-style-type: none"> •The housing must be maintained in a sanitary condition.

<p>(10) Fire safety.</p>	<ul style="list-style-type: none"> •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.
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Lead Based Paint

- Housing assisted with HOME-ARP-SS Program funds is subject to the Lead-Based Paint Poisoning Prevention Act and the Act's implementing regulations at 24 CFR Part 35, Subparts C through M for any building constructed prior to 1978.
- Grantees using HOME-ARP-SS Program funds only for essential services and operating expenses must comply with Subpart K to eliminate as far as practical lead-based paint hazards in a residential property that receives federal assistance for acquisition, leasing, support services or operation activities.
- Must obtain verification that unit was built after 1978 or obtain a Lead Based Paint (LBP) visual assessment if children under the age of six are in the household.
- Must keep documentation on file that LBP was addressed even with determination that LBP rule is not applicable.

Part 4. Draw Process

Before draws can be approved....

- Submit the following to ESG@thda.org:
 - HOME-ARP-SS Proposed Policies and Procedures (Written Standards)
 - Authorized Signature Request Form
 - Sign and submit Grantee Contract
 - Board Resolution Policies and Procedures
- Complete W-9 & Financial information and mail to F&A (if you are not currently set-up)

Financial Information-New Grantees

- New Grantees must submit ACH bank information using Supplier Direct Deposit Authorization Form to Edison Supplier Maintenance.
- Account approval at F&A takes at least 30 days
- Form must include original signatures.
- Do not send a copy to THDA, but email THDA when sent to F&A: ESG@thda.org
- Must submit W-9 form with ACH to F&A at address listed on ACH form:

State of Tennessee

Attn: Supplier Maintenance

21st Floor WRS Tennessee Tower

312 Rosa L Parks Ave

Nashville, TN 37243

Authorized Signature Form

- All Grantees must submit Authorized Signature Form
 - May be emailed to ESG@thda.org
- NOTE: Individual authorizing signature cannot authorize their own signature authority
 - i.e. If Executive Director will have signature authority, Board Chairman must authorize.

HOME-ARP-SS Draw Process

1. Grantees will submit Expense Detail Form and supporting documentation through ECM or PIMS
2. Upon receipt, two THDA staff will review pay request and complete voucher for payment.
3. After Manager's review and approval, the pay request is submitted to fiscal for reimbursement.
4. Reimbursement will be deposited directly in Grantee's account, typically within 2 weeks, no later than 30 days of final F&A approval.



Required Documentation with Reimbursement Requests

Salaries

- Copy of timesheet with the **first draw** (If a new employee starts after the first request is submitted, please submit a timesheet for the new employee along with the first draw for which their salary is included)
- Copy of payroll statements/paystubs
- Include explanation of fringe calculations in first draw of salary reimbursement

Rent

- Copy of Check

NOTE: Make sure client files maintain all Rental Provisions to document eligibility for rental payments & security deposits but do not need to be submitted with reimbursement request

Security Deposits

- Copy of Invoice
- Copy of Check
- Separate line items per participant

Utilities

- Copy of the invoice
- Copy of Check

Transportation

- Mileage log included with mileage reimbursement
- Copy of the gas receipt(s) must be included for gas reimbursement

Equipment/Supplies

- Copy of the invoice
- Copy of Check
- Maintain equipment log for program records but do not need to be submitted with reimbursement request

Legal Services

- Proof that payment is going to licensed attorney
- Invoice
- Proof of payment



Required Documentation with Reimbursement Requests

<p>Moving costs &/or Storage</p> <ul style="list-style-type: none"> • Submit a copy of the invoice • Proof of payment <p>Food</p> <ul style="list-style-type: none"> • Copy of the receipt • If a gift card is purchased, you must include receipt for items purchased using the gift card <p>Childcare</p> <ul style="list-style-type: none"> • Copy of invoice • Copy of Check • List each participant separately. • Proof daycare is licensed 	<p>Data Entry</p> <ul style="list-style-type: none"> • Copy of invoice • Copy of check • Follow salary and equipment directions as needed <p>Housing Counseling Services</p> <ul style="list-style-type: none"> • Proof of HUD certified Housing Counselor Agency • Invoice • Copy of check • Documentation of Housing Counseling hours billed <p>Maintenance</p> <ul style="list-style-type: none"> • Copy of invoice • Copy of check 	<p>Furnishing</p> <ul style="list-style-type: none"> • Copy of the invoice • Copy of check <p>Mental / Outpatient / Substance Abuse Health Services</p> <ul style="list-style-type: none"> • Proof of licensed/certified medical professional providing care • Invoice • Proof of payment
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Things to Remember

- Draws are due by the 15th of the following month
- Holidays slow processing, so plan ahead for your reimbursements
- Keep documentation in cohesive order for quicker turn-around
- If a banking change occurs throughout the grant year, new forms must be submitted to F&A to change account. This action may delay payment from THDA.
- No reimbursements for taxes – all Grantees must use their tax exempt status
- If your organization is a domestic violence agency, you do not have to list the participants' name or payee/vendor in reimbursement requests if it will compromise confidentiality.
- THDA staff may request additional documentation at any time to monitor compliance with program requirements and participant files

Resources

HUD Exchange: <https://www.hudexchange.info/programs/home-arp/>

Implementation Notice: <https://www.hudexchange.info/resource/6479/notice-cpd-2110-requirements-for-the-use-of-funds-in-the-home-arp-program/>

Preferences, Methods of Prioritization and Limitations Policy Brief:
<https://www.hudexchange.info/resource/6640/homearp-policy-brief-preferences-methods-of-prioritization-and-limitations/>

THDA- HOME-ARP Supportive Service: <https://thda.org/government-nonprofit-partners/home-program/home-program-applications-and-information/home-arp-program>

Contact Information

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