

# **POLICY & PROCEDURES IMPLEMENTATION MANUAL**

HOME-ARP Supportive Services and  
Teant Based Rental Assistance



MISSISSIPPI HOME CORPORATION  
735 Riverside Drive  
Jackson, MS 39201





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## OVERVIEW

### Purpose

This Policy and Procedures Implementation Manual applies to the implementation of the HOME-ARP Grants Supportive Services (SS) and Tenant Based Rental (TBRA) Program as authorized by the CPD-21-10 Notice released on September 13, 2024. Mississippi Home Corporation allocates grants to non-profit organizations for reimbursement of eligible expenses related to supportive services and tenant based rental assistance. This Policy and Procedures Implementation Manual can be used to provide guidance and recommendations for subrecipients when developing their agency's HOME-ARP (SS & TBRA) Policies. However, agencies' program performance is monitored according to that agency's program policy as long as it is in accordance with this policy and the CPD-10-10 notice.

The manual outlines the Federal and State requirements of the HOME-ARP SS & TBRA programs. This manual along with HUD regulations CPD-21-10 Notice is the primary resource for implementing projects, but it is not the only resource needed to successfully administer such projects. This manual is a living document and, therefore, will include updates as necessary to reflect changes in MHC's policies and procedures, as well as new HUD regulations, notices, and other guidance. This manual follows federal guidance provided by CPD-21-10.

### Program Administration

The U.S. Department of Housing and Urban Development (HUD) awarded the HOME-ARP grant to the State of Mississippi through the Mississippi Home Corporation (MHC) as a onetime allocation. MHC administers these funds for the State and delegates the implementation to subrecipients; however, as the HUD grantee (or "recipient"), MHC is responsible for ensuring that subrecipients carry out activities in compliance with all applicable requirements. Subrecipients are responsible for making sure that compliance with program requirements occurs at all applicable levels. HOME-ARP grant allocations will be renewed annually to agencies in good standing until September 30, 2029. HOME-ARP funds must be expended by 2030.

### Controlling Statutes, Regulations and Authority

Agencies must comply with applicable laws and guidance including the requirements of:

- Notice: CPD-21-10 (Requirements for the Use of Funds in the HOME-American Rescue Plan Program).
- OMB Uniform Guidance;
- The requirements of this Policy and Procedures Implementation Manual
- The terms and conditions of the sub-grant agreement; and
- Any subsequent HUD Regulations, Notices, and Guidance.
- HUD regulations 2 CFR 200

## Objectives

The objectives of the programs are to assist sub-recipients in accomplishing the following:

1. Providing financial assistance to the Qualifying Populations (QP) identified in the Notice: CPD-21-10;
2. Meeting the needs of special groups within the QP;
3. Reducing the length of time spent in homelessness, preventing the experience of homelessness, and decreasing returns to homelessness.

The HOME-ARP program provides a holistic approach to address the needs of those experiencing homelessness, at risk of homelessness, experiencing domestic violence, or at a greater risk of homelessness. The HOME-ARP program will increase housing accessibility through rental development, shelter accessibility through Non-Congregate Shelter development, providing wraparound supportive services, and by providing housing vouchers through TBRA. MHC's overall goal for HOME-ARP programs is to work with community agencies in ending and preventing the experience of homelessness in Mississippi.

## National Strategic Goals/ Priorities/ Objectives

*HOME Together* is focused on federal strategies that will support states and communities to make homelessness a rare, brief, and one-time experience—and that will sustain that success once achieved. That focus is reflected in its structure.

Ensure Homelessness is a Rare Experience

Objective 1.1: Collaboratively build lasting systems that end homelessness

- Build momentum behind a common vision
- Understand the size and scope of the problem
- Reduce fragmentation
- Drive cost-effective solutions

Objective 1.2: Increase capacity and strengthen practices to prevent housing crises and homelessness

- Reduces the prevalence of risk of housing crises
- Reduce the risk of homelessness while households are engaged with or transitioning from systems
- Target assistance to prevent housing crises

Ensure Homelessness is a Brief Experience

Objective 2.1: Identify and engage all people experiencing homelessness as quickly as possible

- Identify every individual and family
- Coordinate comprehensive strategies
- Use HMIS and other data sources to build maintain active lists of people experiencing homelessness

Objective 2.2: Provide immediate access to low-barrier emergency shelter or other temporary accommodations to all who need it

- Provide access to low-barrier emergency shelter
- Provide access to service-enriched, long-term temporary accommodations when needed and appropriate

Objective 2.3: Implement coordinated entry to standardize assessment and prioritization processes and streamline connections to housing and services

Objective 2.4: Assist people to move swiftly into permanent housing with appropriate and person-centered services

- Expand access to new and existing affordable housing for people experiencing homelessness
- Connect people to rapid re-housing
- Connect people with the most intense needs to permanent supportive housing
- Link people experiencing unsheltered homelessness to housing services

Ensure Homelessness is a One-Time Experience

Objective 3.1: Prevent Returns to Homelessness through Connections to Adequate Services and Opportunities

Sustain an End to Homelessness

Objective 4.1: Sustain Practices and Systems at a Scale Necessary to Respond to Future Needs



## Program Staff

The staff involved in HOME-ARP program management may be contacted for assistance at the following:

HOME-ARP	Tamara Stewart- Vice President of Federal Grants <a href="mailto:tamara.stewart@mshc.com">tamara.stewart@mshc.com</a> 601-718-4654
HOME-ARP	Latoya Hogan, Grant Specialist <a href="mailto:latoya.hogan@mshc.com">latoya.hogan@mshc.com</a> 601-718-4647

## Document Version

Version	Date Approved	Updates
1.0	5/25/2024	

## **PROGRAM REQUIREMENTS**

### **HOME-ARP**

On March 11, 2021, President Biden signed ARP into law, which provides over \$1.9 trillion in relief to address the continued impact of the COVID-19 pandemic on the economy, public health, state and local governments, individuals, and businesses.

To address the need for homelessness assistance and supportive services, Congress appropriated \$5 billion in ARP funds to be administered through HOME to perform four activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations. These activities include (1) development and support of affordable housing, (2) tenant-based rental assistance (TBRA), (3) provision of supportive services; and (4) acquisition and development of non-congregate shelter units.

The State of Mississippi received an allocation of \$38,094,321 in HOME-ARP funding which will be administered by the Mississippi Home Corporation (MHC). To receive these funds, MHC must engage in consultation and public participation processes and develop a HOME-ARP allocation plan that meets the requirements established in HUD Notice CPD-21-10 and submit it to HUD as a substantial amendment to its Fiscal Year 2021 annual action plan. Upon HUD's approval of the HOME-ARP Allocation Plan, the funds will be available for expenditure until September 2030.

HUD provides general oversight of the regulatory guidance and directions the program should follow. This allows recipients to create their own rules required to implement a program if those rules do not violate the overall intent of the program. Mississippi Home Corporation has chosen to implement stricter regulations based on the funds allocated and the timeliness necessary for implementation of the program.

All HOME-ARP subrecipients are required to have internal program policies that are in line with this manual and CPD-21-10 standards.

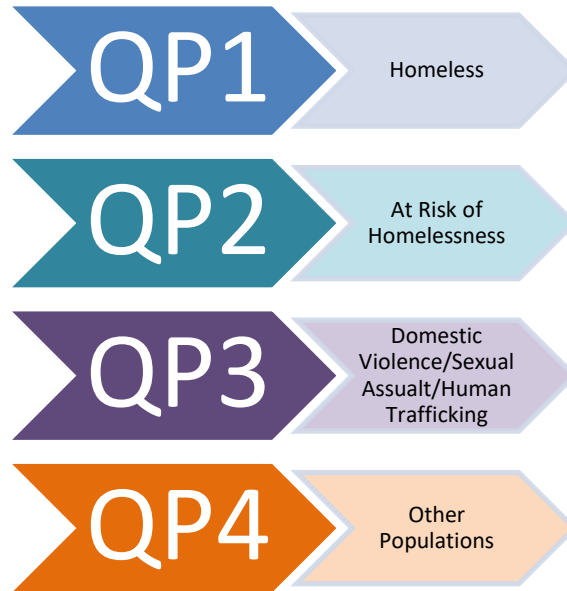
## **PROGRAM DEFINITIONS**

Subrecipient:	is a nonprofit organization that provides housing or supportive services to qualifying households and facilitates the leasing of a rental unit to a qualifying household or the use and maintenance of HOME-ARP TBRA by a qualifying household.
QP qualifying populations:	referred to as "QPs" that described individuals and families that are eligible for assistance.
TBRA	Tenant based rental assistance works as a housing subsidy voucher and is allowable with HOME-ARP
Supportive Services:	Includes a variety of activities targeted towards eligible individuals that may be provided to help improve housing stability and increase housing self-sustainability.

## Qualifying Population (QP)

### Eligible Applicants/QP

HOME-ARP established four “qualifying populations,” referred to as “QPs that described individuals and families that are eligible for assistance.



### Qualifying Population #1 (QP1)

#### 1. Homeless, as defined in 24 CFR 91.5 Homeless (1), (2), or (3):

- (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;
  - (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

### **Qualifying Population #2 (QP2)**

#### **2. At risk of Homelessness, as defined in 24 CFR 91.5 At risk of homelessness:**

- (1) An individual or family who:
  - (i) Has an annual income below 30 percent 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)); or

(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.

### **Qualifying Population #3 (QP3)**

#### **3. Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD.**

For HOME-ARP, this population includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. This population includes cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to 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 or remain within the same dwelling unit. In the case of sexual assault, this also includes cases where an individual reasonably believes there is a threat of imminent harm from

further violence if the individual remains within the same dwelling unit that the individual is currently occupying, or the sexual assault occurred on the premises during the 90-day period preceding the date of the request for transfer.

**Domestic violence:**

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:**

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:**

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:**

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.

## Qualifying Population 4# (QP4)

### 4. Other Populations

Where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability. HUD defines these populations as individuals and households who do not qualify under any of the populations above but meet one of the following criteria:

- 1) **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.
- 2) **At Greatest Risk of Housing Instability** is defined as household who meets either paragraph (i) or (ii) below:
  - (i) as 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.

**Veterans and Families** that include a Veteran Family Member that meet the criteria for one of the qualifying populations described above are eligible to receive HOME-ARP assistance.

## Eligible Activities

### Supportive Services Eligible Activities

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 activities. Supportive services include: a) services listed in section 401(29) of the McKinney Vento Homeless Assistance Act (“McKinney-Vento Supportive Services”)1 (42 U.S.C. 11360(29)); b) homelessness prevention services, c) housing counseling services.

Component	Serving			
	QP1	QP 2	QP3	QP4
Supportive Services				
McKinney Vento Homeless Assistance (SS)	✓		✓	
Homeless Prevention (SS)		✓	✓	✓
Housing Counseling (SS)	✓	✓	✓	✓

If a person is homeless, then the person is eligible to be provided the supportive services as McKinney-Vento supportive services for the costs allowable in [Section A](#). below. If a person is housed and 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 for the costs allowable in [Section A](#). below. Housing Counseling services may be provided regardless of whether a person is homeless or currently housed [Section A](#). below.

For every component, MHC requires sub-recipients to serve each participant and/or potential participant with the “total needs support”. This emphasizes case management as essential to assessing housing and service needs, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of program participants.

**Subrecipients must document in their files which types of supportive services they offer program participants. MHC will document in subrecipients’ written contracts for supportive service whether they are authorizing McKinney-Vento supportive services, homelessness prevention services, Housing Counseling services or some combination of the three. Only the supportive services that are authorized in the subrecipients’ contract for supportive service may be provided to program participants by that subrecipient and only program participants that are eligible for those supportive**



services may be served. As such, subrecipients must demonstrate through their documentation that the individuals served were eligible to receive the supportive services that were authorized under the written contract in order for those costs to be eligible.

Staff cost for supportive services must not exceed **60%** of the subrecipient total grant.

### **Section A: Supportive Services**

If the services outlined in this section are being **directly delivered** by the subrecipient, the following costs are eligible project delivery costs for those services:

1. the costs of labor or supplies and materials incurred by the subrecipient in directly providing supportive services to program participants.
2. the salary and benefit packages of the subrecipient staff who directly deliver the services.
3. These project delivery costs must be attributable to the identifiable objective of the service delivered, otherwise they are administrative costs of the subrecipient.

CPD-21-10: Subpart D details the allowable activities that may be funded with HOME-ARP, Section A Supportive Services. A summary of these components and the activities associated are as follows:

1. **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.
2. **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.
3. **Employment assistance and 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 prevocational training;
  - Books and instructional material;
  - Counseling or job coaching; and
  - Referral to community resources.
4. **Food:** The cost of providing meals or groceries to program participants is eligible.
5. **Housing search and counseling services:** Costs of assisting eligible program participants to locate, obtain, and retain suitable housing are eligible. 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;
  - Assessment of housing for compliance with HOME-ARP requirements for TBRA assistance in **Section B** of this policy and financial assistance for short-term and medium-term rental payments provided under below;
  - 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;
  - 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 subrecipients 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.

6. **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.

- 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.
- 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 subrecipient's employees' salaries and other costs necessary to perform the services.

7. **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:

- the budgeting of resources and money management, household management, conflict management, shopping for food and other needed items, nutrition, the use of public transportation, and parent training.

8. **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.

9. **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

10. **Outreach services:** Street Outreach for unsheltered homeless. 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.

- Eligible costs include the outreach worker's transportation costs and a cell phone to be used by the individual performing the 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 State of Mississippi.

11. **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;
- Inpatient detoxification and other inpatient drug or alcohol treatment **are ineligible.**

12. **Transportation:** Eligible costs are:

- The costs of program participant's travel on public transportation or in a vehicle provided by the subrecipient to and from medical care, employment, childcare, or other services eligible under this policy;
- Mileage allowance for service workers to visit program participants and to carry out housing inspections;
- The costs of subrecipient staff to accompany or assist program participants to utilize public transportation; and
- If public transportation options are not sufficient within the area, and only with pre approval from MHC, the subrecipient 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:
  - i. Payments for car repairs or maintenance on behalf of the program participant may not exceed 10% 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);

- ii. Payments for car repairs or maintenance must be paid by the subrecipient directly to the third party that repairs or maintains the car; and
- iii. 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.

13. **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. 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 that complies with the requirements of this policy
- 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.

14. **Mediation:** HOME-ARP funds may pay for mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the program participant from losing permanent housing in which the program participant currently resides.

15. **Credit repair:** HOME-ARP funds may pay for credit counseling.

16. **Landlord/Tenant Liaison:** Costs of liaison services between property managers/owners and program participants are eligible HOME-ARP 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, in accordance with the financial assistance costs requirements in (18);
- Mediation services in (14) 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.

17. **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.

18. **Financial assistance costs:** 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: Rental housing application fee that is charged by the owner to all applicants.
- 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: HOME-ARP funds may pay for a standard utility deposit or initiation fee required by the utility company or owner (if owner-paid utilities are provided) for all program participants for the following utilities:
  - i. Gas
  - ii. Electric
  - iii. Water
  - iv. Sewer
- Utility payments: HOME-ARP funds may pay 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. 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. Eligible utility services are gas, electric, water, and sewage. No program participant shall receive more than 24 months of utility assistance within any 3-year period.
- Moving costs: HOME-ARP funds may pay for moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance under this section of the Notice and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.
- First and Last month's rent: If necessary to obtain housing for a program participant, HOME-ARP funds may be used to make a prepayment 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. This assistance 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.

- Payment of rental arrears: HOME-ARP funds may be used for a onetime payment for up to 6 months of rent in arrears, including any late fees or charges on those arrears, if necessary for the household to maintain their existing housing or, for those without housing, if necessary to remove a demonstrated barrier to obtaining housing.

19. **Short-term assistance for rent:** Subject to the following conditions, a subrecipients may provide a program participant with short-term financial assistance for rent, provided that the total financial assistance provided, including any pre-payment of first and last month's rent as described above, does not exceed 6 months of rental payments over any 2-year period.

- For this program, short-term assistance means up to 6 months.
- The subrecipient may make rental payments only to an owner with whom they have entered into a financial assistance agreement for rental payment. The financial assistance agreement must set forth the terms under which rental payments will be provided, including the requirements that apply under this Notice. The financial assistance agreement must provide that, during the term of the agreement, the owner must give the subrecipient 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.
  - i. The owner must serve written notice upon the program participant at least 30 days before termination of tenancy specifying the grounds for the action. Each financial assistance agreement that is executed or renewed must comply with the requirements in 24 CFR 92.359.
- MHC's HOME-ARP program currently does not allow for medium-term financial assistance for rent under supportive service. Subrecipients are encouraged to work with TBRA and other resources. MHC may update this policy based on the community needs.

### **Lease Agreement under Supportive Services**

Each program participant must have a legally binding typewritten lease agreement for the rental unit. The lease must be between the property owner or landlord and the program participant (tenant). The lease must be signed by the landlord and the tenant(s). The lease must clearly provide a full and complete address for the rental property. If the lease agreement is between parent and child, siblings or other relatives, it is invalid, and not reimbursable. If an employee, spouse or other family members of the subrecipient program has rental property, that employee is not eligible for rental reimbursement through the HOME-ARP program.

If the property owner is renting a single-family unit, the lease must also be typewritten. Handwritten lease agreements or notices from the property/landlord are no longer acceptable.

Subrecipients must be ensured that they follow appropriate conflict of interest policies 24 CFR 92.356.

**Housing Counseling:**

Costs associated with housing counseling services as defined at 24 CFR 5.100 and 5.111 are eligible under HOME-ARP. If a program participant is a candidate for homeownership, costs associated with pre-purchase homebuying counseling, education and outreach are eligible under HOME-ARP. Eligible costs are those costs associated with the services listed in 24 CFR part 214 and include, but are not limited to:

- a. Staff salaries and overhead costs of HUD-certified housing counseling agencies related to directly providing eligible housing counseling services to HOME-ARP program participants;
- b. Development of a housing counseling workplan;
- c. Marketing and outreach;
- d. Intake;
- e. Financial and housing affordability analysis;
- f. 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);
- g. Follow-up communication with program participants.

Ineligible cost: Homeowner assistance and related services are not eligible HOME-ARP activities, costs for the provision of services related to mortgages and homeownership to existing homeowners are also not eligible under HOME-ARP.



<b>Rental Housing Counseling Topics</b> <b>(24 CFR 214.300(e)(4))</b>	<b>Pre-Purchase Homebuying Topics</b> <b>(24 CFR 214.300(e)(1))</b>	<b>Homeless Services Topics</b> <b>(24 CFR 214.300(e)(5))</b>
HUD rental and rent subsidy programs	Advice regarding readiness and preparation	Homeless assistance information regarding emergency shelter
Other federal, state, or local assistance	Federal Housing Administration insured financing	Other emergency services
Fair housing	Housing selection and mobility	Transitional housing
Rental search assistance	Housing search assistance	Referral to local, state, and federal resources <a href="#">(24 CFR 214.300(b)(2))</a>
Landlord tenant laws	Fair housing and predatory lending	
Lease terms	Budgeting and credit	
Rent delinquency	Loan product comparison	
Referrals to local, state, and federal	Purchase procedures and closing costs	
	Referrals to local, state,	

## **Section B: Tenant Based Rental Assistance (TBRA)**

The HOME-American Rescue Plan (HOME-ARP) Tenant-Based Rental Assistance (TBRA) program provides rental assistance to eligible individuals and households who are homeless, at risk of homelessness, or belong to other vulnerable populations. This policy outlines the eligibility criteria, application process, and administration of the TBRA program to ensure equitable and efficient distribution of assistance.

This policy aims to define the guidelines and procedures for administering the HOME-ARP TBRA program, ensuring fair access and support to those in need of rental assistance.

TBRA Eligible Costs:

HOME-ARP funds may be used to provide TBRA assistance to QP households who apply for TBRA assistance.

TBRA allows for subrecipients to assist a qualifying household with payments to cover the entire (100%) or insufficient amounts based on rent calculations that the QP cannot pay for including housing and housing-related costs, such as rental assistance, security deposits, and utility deposits.

HOME-ARP TBRA assisted households may choose to rent a unit in a HOME-ARP rental project or any other eligible rental unit. HOME-ARP TBRA is a form of rental assistance that is attached to the household and not a particular rental unit.

- Therefore, the HOME-ARP TBRA assisted household may choose to move to another unit with continued HOME-ARP TBRA as long as the new unit meets the applicable property standards.
- If a HOME-ARP TBRA assisted household chooses to move, the rental assistance contract terminates and a new rental assistance contract for the new unit will be executed according to HOME-ARP TBRA requirements.
- The TBRA applicant assisted household must notify the subrecipient before moving in order to receive continued HOME-ARP TBRA.

TBRA funds may be used to provide:

1. rental assistance,
2. security deposit assistance,
3. utility deposits, and
4. utility payments

To qualifying households. HOME-ARP may pay up to 100% of these costs for a qualifying household. Utility deposit assistance is an eligible cost only if rental assistance or a security deposit payment is provided.

The costs of inspecting the housing are also eligible as costs of HOME-ARP TBRA. Administration of HOME-ARP TBRA is an eligible cost only if executed in accordance with general management oversight and coordination at 24 CFR 92.207(a), except that the costs of inspecting the housing and determining the income eligibility of the family are eligible project costs under HOME-ARP TBRA.

**Ineligible Costs:**

HOME-ARP TBRA may not be used to pay for the homebuyer program as defined at 24 CFR 92.209(c)(2)(iv).

**Portability of Assistance:**

TBRA assistance is limited to boundaries of Mississippi Home Corporation (82 counties in the State of Mississippi); therefore, a household may move their voucher outside the subrecipient boundaries and continue to receive assistance as long as the household resides in Mississippi.

**Tenant Selection:**

Only individuals and families in the QP are eligible to receive HOME-ARP TBRA assistance. Subrecipients must perform tenant selection in accordance with the Waiting List policy in this notice

(first come first served based on eligibility and documentation).

- HOME-ARP TBRA is reserved for limit eligibility to households/individuals that meet one of the QPs.
  - The selection process must not violate nondiscrimination requirements.
- TBRA tenants must be selected from the subrecipient waiting list in chronological order.
- Subrecipients must give prompt written notice to any rejected applicant and grounds for rejection with appeal process.
- Subrecipients TBRA program must comply with VAWA requirements which must also include an emergency transfer plan and VAWA required documentation.

### **TBRA and Supportive Services**

Subrecipients that received a TBRA award also received an award for Supportive Services for QP. Therefore, subrecipients must provide TBRA applicants with any eligible type of Supportive Services as determined necessary as a nonmandatory service option.

Subrecipients must document when supportive services are offered/provided, and they type of supportive services offered/provided. Supportive services must comply with all the requirements identified in the Supportive Service activity.

### **Leasing Requirements under TBRA**

Tenant Protections: subrecipients must have an executed lease (typed, signed and dated) between:

- The QP that receives HOME-ARP TBRA and the owner of the rental unit **or**
- Between the owner of the rental unit and the subrecipient
  - With a sublease between the QP and the subrecipient, in accordance with 24 CFR 92.253(a).
  - A HOME-ARP sponsor is a nonprofit organization that provides housing or supportive services to qualifying households and facilitates the leasing of a rental unit to a qualifying household or the use and maintenance of HOME-ARP TBRA by a qualifying household.
  - Subrecipients may execute a lease or master lease with a project owner (HOME-ARP rental development projects).
    - The HOME-ARP subrecipient must then sublease unit to a qualifying household. The lease between the qualifying household and the rental unit owner or the sublease between the subrecipient and the QP cannot contain any of the prohibited lease terms specified in 24 CFR 92.253(b).

### **Rental Assistance contract**

Subrecipients of the HOME-ARP TBRA grant will be receiving HOME-ARP TBRA subsidy directly from MHC as reimbursement. Before obligating TBRA funds, the subrecipient must complete Housing Assistant Payments Contract (HAP). The HAP contract will contain:

- Specify the requirements for the subrecipient the TBRA subsidy on behalf of the QP
- The obligations of the subrecipient to use the TBRA payment to pay rent for the unit to the property owner or management agency (collect appropriate and reasonable documentation to prove ownership or management affiliation).

\*\*Note: All TBRA leases and subleases dates, terms, and conditions.

### **Term of Rental Assistance Contract:**

The maximum term of the rental assistance contract is 12 months (one year) not to surpass the date September 30, 2030. The rental assistance contract continues until the end of the rental assistance contract term, or until the lease or sublease is terminated, whichever occurs first.

The term of the rental assistance contract may be renewed, subject to the availability of HOME-ARP funds and program participation/compliance.

- With each contract renewal, a re-evaluation is required. The term of the rental assistance contract must begin on the first day of the term of the lease.

### **Maximum Subsidy**

The allowable maximum subsidy for the TBRA program is

=Rent Standard – 30% of monthly adjusted income. When calculating households' income and rental subsidy, subrecipients must use HUD's CPD Income Eligibility Calculator.

### **TBRA with Rental Development Projects**

HOME-ARP Rental Development owners must sign a written agreement that require the owner to comply with MHC's tenant selection and waitlist requirements.

- The rent may not exceed 30% of the annual income of a family whose income equals 50% of the median income for the area, as determined by HUD, with adjustments for smaller and larger families. HUD annually provides the HOME Rent Limits, that are also applicable to HOME-ARP, which include average occupancy per unit and adjusted income assumptions. This is also known as the low HOME rent limit.

## **Housing and Rent requirements**

### **Rent Limit Standards**

The rent limit is the maximum rent subsidy that can be paid for a unit of a given size. HOME-ARP rental resources must comply with rent reasonableness and Fair Market rent standards as appropriate for that year as the approved rent limitation standard for HOME-ARP unless redefined by HOME/HOME-ARP rental limits. MHC may consider FMR waivers if deemed necessary by the community assessment.

## Rent Reasonableness.

The rent for the unit assisted with HOME-ARP funds must not exceed the lesser of the FMR or the rent reasonableness standard. Rent reasonableness is determined by comparing the gross rent of three to four units in a set community to the Fair Market Rent (FMR updated annually) of that community.

- A. To calculate the gross rent of a unit that is being tested for rent reasonableness and the FMR standard in a unit where the tenant is responsible for paying the utilities:
  1. Total contract rent amount of the unit + Any fees required for occupancy under the lease (excluding late fees and pet fees) + Monthly **utility allowance\*** (excluding telephone) = Gross Rent Amount
    - a) Utility Allowance is established by a local Public Housing Authority (PHA) and includes all utilities paid for by the tenant.
- B. To calculate the gross rent of a unit that is being tested for rent reasonableness and the FMR standard in a unit where the tenant is NOT responsible for paying the utilities:
  1. Total contract rent amount of the unit + Any fees required for occupancy under the lease (excluding late fees and pet fees) = Gross Rent Amount

Subrecipients must establish their own written policies and procedures for documenting comparable rents to establish transparency and consistency across all projects. Written policies and procedures should include:

- A methodology for documenting comparable rents
- Case file checklists and forms
- Standards for certifying comparable rents as reasonable
- Determination must be supported by documentation in the case file.

A grantee must determine, and document rent reasonableness for all units for which rent assistance (including arrears) and/or security deposit assistance is being provided. The requirement applies whether Supportive Services and/or TBRA assistance is provided.

## Fair Market Rent.

Rental assistance cannot be provided for a unit that exceeds the [Fair Market Rent](#) established by HUD. Fair Market Rent amounts are based on units that include utilities. Rent must follow HUD standard of rent reasonableness (comparable like units).

## Habitability Standards

HOME-ARP Supportive Service and TBRA units must meet the NSPIRE (1.8.5.3. Affirmative Habitability Requirements) housing standards.

HOME-ARP funds cannot be used to help a program participant remain in or move into housing that does not meet NSPIRE standards. This restriction applies to all activities under HOME-ARP, including supportive services and TBRA.

**Lead based paint**

All subrecipients funded with HOME-ARP funds must follow minimum standards for compliance with the lead-based paint remediation and disclosure requirements identified in 24 CFR Part 35 including the Lead-Based Paint Poisoning Prevention Act, the Lead-Based Paint Hazard Reduction Act of 1992 and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M and R. All subrecipients must include in their Written Standards policies and procedures on how they will document need for and inspections for lead-based paint.

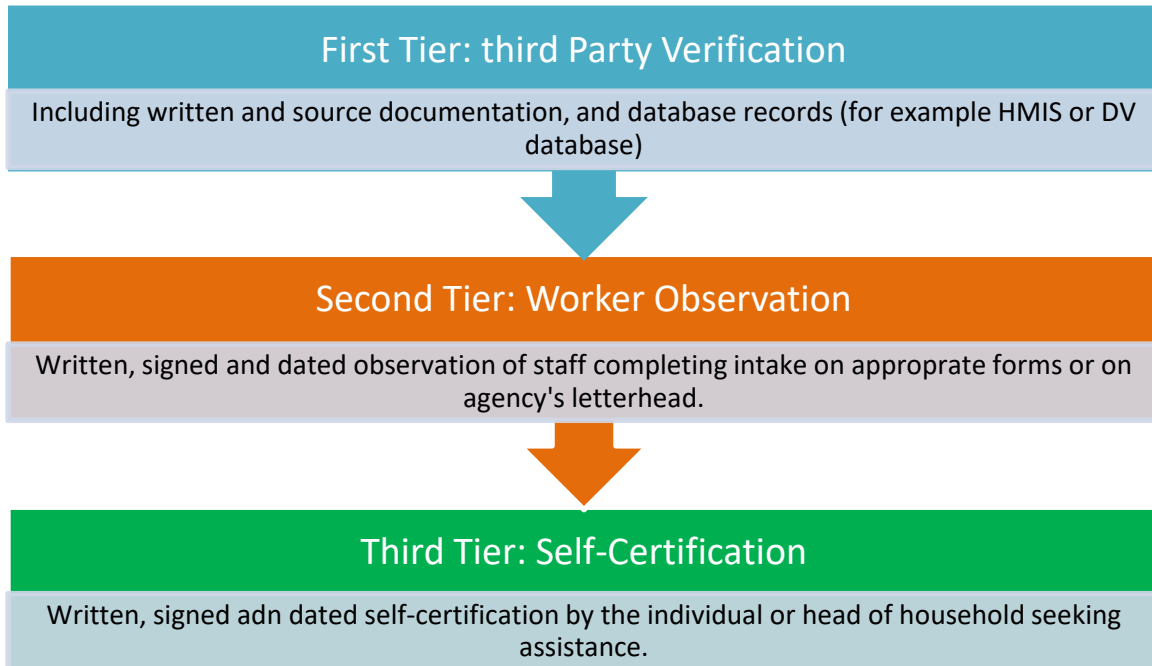
**Program Income**

Program income earned as a result of the use of HOME-ARP funds is HOME program income and must be used in accordance with the requirements of 24 CFR part 92 and reported by the subrecipient.

## Record Keeping

### Documentation Order of Priority.

It is the subrecipient responsibility to collect the required documentation to determine eligibility and provide services. Documentation order of priority **MUST** be followed by QP1 and QP2, and QP4. Documentation order of priority **DOES NOT** apply for QP3. Documentation must be collected in order of preference:



**\*Agencies cannot withhold or deny services if third party documentation is not accessible.**

**\*If third party documentation is not accessible, subrecipients must provide documentation proof of efforts to collect third party documentation. Subrecipients policies must include documentation priority and documentation of efforts to collect third party documentation.**

### First Tier Documentation: Third Party Verification

- Source Documents:
  - Pre-existing records from a third party provided to intake staff such as receipts and printouts from relevant third-party information system,
  - Examples: SSI award letter, Eviction Notice, Discharge paperwork
- Written verification:
  - Letters, written referral, or written observations by another person that are signed, dated, and on appropriate letterhead.
  - Examples: Written observation of a shopkeeper, written referral from law enforcement, letter from property owner that person must leave.
- Documented Oral Verification
  - Verification provided by a third party given over the phone or in person directly to the

intake staff. Intake staff records the statement in writing, certifies its true and completes, signs and dates.

- Examples: Intake worker calls leaseholders who confirm that the family can no longer stay in the apartment after this week because of pending lease violations.

### **Second Tier Documentation: Intake Worker Observation**

- Intake worker observation must:
  - Be issued on third party letterhead or form an agency email address.
  - Identify the intake worker that made the observation
  - Certify that the statement is true and complete
  - Be signed and dated by the intake worker
  - Example: An intake worker physically observes a person residing in their car and writes, signs and dates the observation for the record.

### **Third Tier Documentation: Self-Certification**

- Self-Certification must :
  - Identify the individual or head of household
  - Provides detail of specific criteria being documented
  - Certify that the statement is true and complete
  - Be signed and dated by the individual or head of household.
- Self-certification should be infrequent, but are permitted.

### **Sub-recipients will be responsible for ensuring the following:**

- Before financial services are provided, collect eligibility documentation and documentation to justify financial assistance.
- Emergency/Arrearage payments must be made to the provider (e.g. landlord, utility company) of such items or services on behalf of an individual or family, and not directly to an individual family, or debt collections agency.
- Proper documentation must be maintained to ensure that all costs incurred are eligible.
- Proper documentation must be maintained that shows how the amount of assistance provided was determined to be necessary and reasonable.



## Qualifying Populations Eligibility Documentation

### Homeless Status QP1 (Section IV.A,1 and 24 CFR91.5)

Homelessness as defined in category (1)-(3)

- Paragraph 1: Literally Homeless
- Paragraph 2: Imminent Risk of Homelessness
- Paragraph 3: Homelessness Under Other Federal Statutes

#### **Paragraph 1: Literally Homeless**

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

- i. Primary nighttime residence that is a public or private place not designed for regular sleeping accommodations for human being,
  - ii. Living in a supervised publicly or privately operated shelter designed to provide temporary living arrangements.
  - iii. Exiting an institution where he or she resided for 90 days or less and who resided in emergency shelter or place not meant for human habitation immediately prior to entering that institution.
- Income is NOT REQUIRED for individuals/households who are literally homeless.

#### **Paragraph 2: Imminent Risk of Homelessness**

- i. An individual or family who will immediately lose their primary nighttime residence within 14 days of the date of application for assistance, **AND**
  - ii. No subsequent residence has been identified, **AND**
  - iii. Household lacks resources or support networks needed to obtain other permanent housing.
- Income is NOT REQUIRED for individuals/households who are at imminent risk of becoming homeless.

#### **Paragraph 3: Homeless Under Other Federal Statutes**

Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under the QP1 definition but who are defined as homeless under one of the other listed federal statutes in this policy and in Section IB.A.1, **AND**

- i. Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any in the last 60 days, immediately prior to the date of application for assistance; **AND**
  - ii. Have experienced persistent instability as measured by two or more moves in the last 60 days; **AND**
  - iii. Can be expected to continue in such status for an extended period of time due to special needs barriers (For example: chronic health or mental health conditions, substance addictions, history of DV or child abuse).
  - iv. Have documented barriers which includes the presence of special needs or two or more barriers.
- i. Income is NOT REQUIRED for individuals/households who are homeless under other federal

statuses.

### **QP1 Homeless Status Recordkeeping**

**QP1 Homeless status.** The subrecipient must maintain and follow intake procedures to ensure compliance with the homeless definition **at QP1**. Homeless documentation is required at intake to include evidence relied upon to establish and verify homeless status. The subrecipient policy 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 receiving HOME-ARP resources. Records obtained from local Coordinated Entry Systems are acceptable evidence of third-party documentation.

- A. If the individual or family qualifies as QP1, homeless under paragraph (1)(i) or (ii) of the homeless definition, acceptable evidence includes a written referral by another housing or service provider, written verification from a shelter, community service provider, or any individual/agency that witness the living conditions, or written observation by an outreach worker of the conditions where the individual or family was living, or a certification by the individual or head of household seeking assistance.
- B. If the individual qualifies as homeless under paragraph (1)(iii) of the homeless definition, because he or she resided in an emergency shelter or place not meant for human habitation and is exiting an institution where he or she resided for 90 days or less, acceptable evidence includes the evidence described in [A](#) of this section and one of the following:
  - a. Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution. All oral statements must be recorded by the intake worker; or
  - b. Where the evidence in [B.a.](#) of this section is not obtainable, a written record of the intake worker's due diligence in attempting to obtain the evidence described in paragraph B.a. and a certification by the individual seeking assistance that states he or she is exiting or has just exited an institution where he or she resided for 90 days or less.
- C. If the individual or family qualifies as homeless QP1, because the individual or family will imminently lose their housing, the evidence must include:
  - a.
    - i. A court order resulting from an eviction action that requires the individual or family to leave their residence within 14 days after the date of their application for homeless assistance; or the equivalent notice under applicable state law, a Notice to Quit, or a Notice to Terminate issued under state law;
    - ii. For individuals and families whose primary nighttime residence is a hotel or motel room not paid for by charitable organizations or federal, state, or local government programs for low-income individuals, evidence that the individual or family lacks the resources necessary to reside there for more than 14 days after the date of application for homeless assistance; or
    - iii. An oral statement by the individual or head of household that the owner or renter

of the housing in which they currently reside will not allow them to stay for more than 14 days after the date of application for homeless assistance. The intake worker must record the statement and certify that it was found credible. To be found credible, the oral statement must either: (I) be verified by the owner or renter of the housing in which the individual or family resides at the time of application for homeless assistance and documented by a written certification by the owner or renter or by the intake worker's recording of the owner or renter's oral statement; or (II) if the intake worker is unable to contact the owner or renter, be documented by a written certification by the intake worker of his or her due diligence in attempting to obtain the owner or renter's verification and the written certification by the individual or head of household seeking assistance that his or her statement was true and complete;

- b. Certification by the individual or head of household that no subsequent residence has been identified; and
  - c. Certification or other written documentation that the individual or family lacks the resources and support networks needed to obtain other permanent housing.
- D. If the individual or family qualifies as homeless under paragraph (3) of the homeless definition, because the individual or family does not otherwise qualify as homeless under the homeless definition but is an unaccompanied youth under 25 years of age, or homeless family with one or more children or youth, and is defined as homeless under another Federal statute or section 725(2) of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11434a\(2\)](#)), the evidence must include:
- a. For paragraph (3)(i) of the homeless definition, certification of homeless status by the local private nonprofit organization or state or local governmental entity responsible for administering assistance under the Runaway and Homeless Youth Act ([42 U.S.C. 5701 et seq.](#)), the Head Start Act ([42 U.S.C. 9831 et seq.](#)), subtitle N of the Violence Against Women Act of 1994 ([42 U.S.C. 14043e et seq.](#)), section 330 of the Public Health Service Act ([42 U.S.C. 254b](#)), the Food and Nutrition Act of 2008 ([7 U.S.C. 2011 et seq.](#)), section 17 of the Child Nutrition Act of 1966 ([42 U.S.C. 1786](#)), or subtitle B of title VII of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11431 et seq.](#)), as applicable;
  - b. For paragraph (3)(ii) of the homeless definition, referral by a housing or service provider, written observation by an outreach worker, or certification by the homeless individual or head of household seeking assistance;
  - c. For paragraph (3)(iii) of the homeless definition, certification by the individual or head of household and any available supporting documentation that the individual or family moved two or more times during the 60-day period immediately preceding the date of application for homeless assistance, including: recorded statements or records obtained from each owner or renter of housing, provider of shelter or housing, or social worker, case worker, or other appropriate official of a hospital or institution in which the individual or family resided; or, where these statements or records are unobtainable, a written record of the intake worker's due diligence in attempting to obtain these statements or records. Where a move was due to the individual or family fleeing domestic violence, dating violence,

- sexual assault, or stalking, then the intake worker may alternatively obtain a written certification from the individual or head of household seeking assistance that they were fleeing that situation and that they resided at that address; and
- d. For paragraph (3)(iv) of the homeless definition, written diagnosis from a professional who is licensed by the state to diagnose and treat that condition (or intake staff-recorded observation of disability that within 45 days of date of the application for assistance is confirmed by a professional who is licensed by the state to diagnose and treat that condition); employment records; department of corrections records; literacy, English proficiency tests; or other reasonable documentation of the conditions required under paragraph (3)(iv) of the homeless definition.

**See documentation requirements exhibit.**

**At Risk of Homelessness QP2.** (Section IV.A,2 and 24 CFR91.5)

At Risk of Homelessness paragraph (1)-(3)

- Paragraph 1: Individuals and Families
- Paragraph 2: Unaccompanied Children
- Paragraph 3: Families with Children and Youth

**Paragraph 1: Individuals and Families**

An individual or family who:

- i. Has income at or below 30% AMI **AND**
- ii. Does not have sufficient resources or support networks immediately available to prevent them from moving into an emergency shelter or other place defined in “Literally Homeless” definition, **AND**
- iii. Met one of seven (7) 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 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;

**Paragraph 2: Child or Youth**

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(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or

### **Paragraph 3: Child or Youth**

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.

### **QP2 Risk of Homelessness Recordkeeping**

For each individual or family who receives HOME-ARP assistance qualifying under QP2, the records must include the evidence relied upon to establish and verify the individual or family's “at risk of homelessness” status. This evidence must include an intake and certification form that meets HUD specifications and is completed by the subrecipient. To qualify for HOME-ARP under the QP2 “At Risk of Homelessness” the individual or family must meet one of the At Risk of Homelessness Status as described in paragraph (1), (2), and (3).

Reference **Mandatory Documentation and Documentation Requirements** in this manual for acceptable verification of “At Risk of Homelessness”.

- A. If the program participant meets the criteria under paragraph (1) of the “at risk of homelessness” definition:
  - (i) The documentation specified under this section for determining annual income;
  - (ii) The program participant's certification on a form specified by HUD or MHC that the program participant has insufficient financial resources and support networks; *e.g.*, family, friends, faith-based or other social networks, immediately available to attain housing stability and meets one or more of the conditions under paragraph (1)(iii) of the definition of “at risk of homelessness”;
  - (iii) The most reliable evidence available to show that the program participant 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. Acceptable evidence includes:
    1. Source documents (*e.g.*, notice of termination from employment, unemployment compensation statement, bank statement, health-care bill showing arrears, utility bill showing arrears);
    2. To the extent that source documents are unobtainable, a written statement by the relevant third party (*e.g.*, former employer, public administrator, relative) or the written certification by the recipient's or subrecipient's intake staff of the oral verification by the relevant third party that the applicant meets one or both of the criteria under paragraph (1)(ii) of the definition of “at risk of homelessness” in § 576.2; or

3. To the extent that source documents and third-party verification are unobtainable, a written statement by the recipient's or subrecipient's intake staff describing the efforts taken to obtain the required evidence; and
- (iv) The most reliable evidence available to show that the program participant meets one or more of the conditions under paragraph (1)(iii) of the definition of "at risk of homelessness".

Acceptable evidence includes:

1. Source documents that evidence one or more of the conditions under paragraph (1)(iii) of the definition (e.g., eviction notice, notice of termination from employment, bank statement);
  2. To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., former employer, owner, primary leaseholder, public administrator, hotel or motel manager) or the written certification by the recipient's or subrecipient's intake staff of the oral verification by the relevant third party that the applicant meets one or more of the criteria under paragraph (1)(iii) of the definition of "at risk of homelessness"; or
  3. To the extent that source documents and third-party verification are unobtainable, a written statement by the recipient's or subrecipient's intake staff that the staff person has visited the applicant's residence and determined that the applicant meets one or more of the criteria under paragraph (1)(iii) of the definition or, if a visit is not practicable or relevant to the determination, a written statement by the recipient's or subrecipient's intake staff describing the efforts taken to obtain the required evidence; or
- B. If the program participant meets the criteria under paragraph (2) or
- C. of the "at risk of homelessness" definition QP2, certification of the child or youth's homeless status by the agency or organization responsible for administering assistance under the Runaway and Homeless Youth Act ([42 U.S.C. 5701](#) *et seq.*), the Head Start Act ([42 U.S.C. 9831](#) *et seq.*), subtitle N of the Violence Against Women Act of 1994 ([42 U.S.C. 14043e](#) *et seq.*), section 330 of the Public Health Service Act ([42 U.S.C. 254b](#)), the Food and Nutrition Act of 2008 ([7 U.S.C. 2011](#) *et seq.*), section 17 of the Child Nutrition Act of 1966 ([42 U.S.C. 1786](#)) or subtitle B of title VII of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11431](#) *et seq.*), as applicable.

**See documentation requirements exhibit.**

**Freeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking QP3** (Section IV.A,3; 24CFR5.2003; 22USC 7102 )

Fleeing, or attempting to flee:

- domestic violence
- dating violence
- sexual assault

- stalking
- human trafficking (labor or sex 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.

This population includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. This population includes cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to 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 or remain within the same dwelling unit. In the case of sexual assault, this also includes cases where an individual reasonably believes there is a threat of imminent harm from further violence if the individual remains within the same dwelling unit that the individual is currently occupying, or the sexual assault occurred on the premises during the 90-day period preceding the date of the request for transfer.

### **QP3 Freeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking Recordkeeping**

If the individual or family qualifies under QP3 as defined 24 CFR 5.2003 because the individual or family is fleeing domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions related to violence, then acceptable evidence includes:

- an oral or written statement by the individual or head of household seeking assistance that they are fleeing that situation, OR
- A written certification by a victim service provider, law enforcement agency, legal assistance provider, pastoral counselor, or an intake worker in **any other organization** from who the individual or family sought assistance.
- The written referral or observation need only include **the minimum amount** of information necessary to document that the individual or family is fleeing, or attempting to flee domestic violence, dating violence, sexual assault, and stalking, **and need not include any additional details** about the conditions that prompted that individual or family to seek assistance.
- **Verification of household's eligibility under this QP definition should be trauma-focused and not jeopardize the household's safety.**

**Income is NOT REQUIRED** for individuals/households who qualifies under QP3 Fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking.

### **Other Populations, QP4**

Includes providing supportive services or to prevent the family's homelessness or would serve those with the greatest risk of housing instability. HUD defines these populations as individuals and households who do not qualify under any of the populations above but meet one of the following criteria:

1. *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 (QP1 or QP3), **and**



- 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
2. *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, QP2:
    - (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.

**QP4 Other Populations paragraph 1 Recordkeeping (formerly homeless and in a temporary program)**

If the individual or family qualifies under QP4 because they:

- They were previously homeless; and
- They are in a temporary emergency assistance program; and
- And they need additional assistance to maintain stable housing,

The required documentation includes:

1. Previous homeless history (one of the bellow documents would be accessible)
  - a. A dated, signed written observation describing the conditions where the individual or family was living issued by an outreach worker, or other third party evidence
  - b. A written, dated and signed referral by another housing agency or service provider.
  - c. Records from HMIS demonstrating enrollment in homeless services programs.
  - d. Other documents including prior homeless status as described for the QP1 documentation.
  - e. Self-certification; only acceptable when third party observation is unavailable.
2. Verification that the applicant is currently housed in a temporary or emergency assistance program that is ending (and they have not been discharged from that program) (one of the bellow documents would be accessible)
  - a. Written, dated and signed verification that a household received time-limited assistance and the dates that assistance will end/has ended.
  - b. Records from HMIS demonstrating enrollment in temporary or emergency assistance program that will end/has ended.
  - c. Self-certification; only acceptable when third party observation is unavailable.
3. Verification that additional assistance is needed to prevent a return to homelessness (one of the bellow documents would be accessible)
  - a. Dated and signed written verification or assessment completed showing services or housing assistance are needed to prevent a return to homelessness.
  - b. When third party is not available, documentation of intake staff observation of potential barriers as appropriate, dated and signed will be acceptable.
  - c. Self-certification; only acceptable when third party and intake observation are unavailable.

**Income is NOT REQUIRED** for individuals/households who qualifies under QP4 Other Populations paragraph 1 as previously homeless and currently in a temporary emergency housing program.

**QP4 Other Populations paragraph 2 Recordkeeping (At risk of homelessness due to cost burden)**

If the individual or family qualifies under QP4 because they:

- Paragraph 2.i.
  - Having an annual income that is less or equal to 30% AMI, **and**
  - Experiencing severe cost burden (paying more than 50% of their monthly household income towards housing costs) **or**
- Paragraph 2.ii.
  - Having an annual income that is less than or equal to 50% AMI, **and**
  - Evidence of housing instability tied to the specific condition described under the At Risk of Homelessness definition (iii) (A-G).

The required documentation for Paragraph 2.i. includes:

- Income verification of 30% AMI or below
  - Wage statements, pay stubs, unemployment, public benefits statement, bank statement may be used to calculate and show household eligibility.

- Self-certification; only acceptable when third party documentation is unavailable.
- Cost burden, paying more than 50% annual income towards housing costs.
  - Current lease with rent amounts, or letter from owner/primary leaseholder with rent amounts, **and**
  - Written calculation between rent and current income to document household eligibility.
    - Note: Housing cost must be at least 50% of the AMI
  - Self-certification; only acceptable when third party documentation is unavailable.

The required documentation for Paragraph 2.ii. includes:

- Income verification of 50% AMI or below
  - Wage statements, pay stubs, unemployment, public benefits statement, bank statement may be used to calculate and show household eligibility.
  - Self-certification; only acceptable when third party documentation is unavailable.
- Housing Instability meeting the At Risk of Homelessness definition (iii) (A-G)
  - Documentation requirements same as QP 2 At Risk of Homelessness documentation.
  - See QP2 Risk of Homelessness [Recordkeeping documentation](#).

**Determinations of ineligibility.** For each individual and family determined ineligible to receive HOME-ARP assistance, the record must include documentation of the reason for that determination.

## Waiting List

### Referral Method and HOME-ARP Waiting List

The state does not have a preference or prioritization in place for QPs. Instead, all QPs have access to apply for placement on the waiting list for an activity or project. Mississippi Home Corporation will serve as the main entry point for HOME-ARP; ~~however, subrecipients are responsible for developing an acceptable waiting list for their coverage area from referral generated from Mississippi Home Corporation referral portal. HOME-ARP applicants/referrals must not be placed on the project/activity waiting list until:~~

**The HOME-ARP waiting list is a first-come, first-served waiting list based on the availability of HOME-ARP resources in that county or service area, and applicants must be served in chronological order.**

- ~~1. Verification of QP eligibility has been obtained~~
- ~~2. The QP is document ready~~

### Applicants

#### Application Process

- 1. Initial Screening:**
  - All applicants must complete an initial screening to determine eligibility.
- 2. Documentation:**
  - Applicants must provide necessary documentation to verify their eligibility.
- 3. Completed application ~~and waiting list:~~**
  - Eligible applicants submit a completed application form along with required documentation.

## Initial Screening

Before placing an applicant in the HOME-ARP **project waiting list**, an eligibility screening and assessment must be completed. The assessment must consist of:

- Screening
- Asking specific questions to determine which QP. For example:
  - ✓ QP 1: Where did you sleep last night
  - ✓ QP 2: What's your current household income, when do you have to leave your current housing situation, and do you have somewhere safe to go if you must leave?
  - ✓ QP 3: An oral statement during screening/assessment is acceptable. Minimal information to indicate their situation is acceptable.
  - ✓ QP 4:
    - Were you previously homeless and currently in a temporary housing program? (P1)
    - What's your current household income and what is your current rent? (P2i)
    - What's your current household income? Do you have somewhere safe to go if you must leave? (P2ii)

## Documentation

- All eligibility documentation as described in the Recordkeeping section of this policy.

## Completed application and waiting list

### Time and date

The date and time a QP referral is made will be documented. Additionally, subrecipients **MUST** document the date and time the QP **initial screening was conducted and completed, and the date and time the QP was accepted to their project/activity** **waiting list**.

Subrecipients must work with the QP to quickly obtain required documentation. The below documents timeline may be used by agencies to prevent any delays with accessing the waiting list.

1. Case managers have 5 business days to collect eligibility documentation.
  - Case managers must not rely on the QP alone to provide documentation, but they must help the QP obtain required documentation whenever necessary and possible.
2. If documentation is still pending after the initial **5** days, the case manager may follow up with the QP every 5 day for 15 days.
3. If there is no follow-up from QP after 15 days, the referral may be closed.

Subrecipients must document the date a referral is closed or rejected and the reason why that decision was made.

## Accepting Referrals from the Waiting List

~~Subrecipients waitlist process must be approved by MHC. The waiting list established by subrecipients from referrals received must document the date and time the household first presented for assistance and was placed on the waiting list. The waiting list will be used to determine the first-come, first-served order for supportive services and TBRA provided to QP households.~~

All subrecipients will have access to the waiting list. The waiting list will be used to determine the first-come, first-served order for supportive services and TBRA provided to QP households. The waiting list is maintained by MHC through a confidential database. Agencies must complete a Personal Identification Information (PII) training before gaining access to the waiting list.

## Maintaining the Waiting List

### Subrecipients must update the waitlist accordingly:

1. **Regular Updates:** The waiting list will be reviewed and updated regularly and timely to accurately record the date and time referrals are made.
2. **Applicant Responsibility:** Applicants are responsible for informing the agency of any changes in contact information or circumstances that might affect their eligibility.
3. **Communication:** The agency will communicate regularly with applicants to confirm continued interest and eligibility.

## Removal from the Waiting List

- **Voluntary Withdrawal:** Applicants may request to be removed from the waiting list at any time.
- **Ineligibility:** Applicants found to be ineligible based on updated information will be removed from the list and notified in writing.
- **Failure to Respond:** Applicants who do not respond to communication attempts or fail to update their information may be removed from the waiting list.

Subrecipients must document the date an applicant was removed from the waiting list or rejected and the reason why that decision was made.

Waiting List

## ~~Referral Method and HOME-ARP Waiting List~~

~~The state does not have a preference or prioritization in place for QPs. Instead all QPs have access to apply for placement on the waiting list for an activity or project. Mississippi Home Corporation will serve as the main entry point for HOME-ARP; however, subrecipients are responsible for developing an acceptable waiting list for their coverage area from referral generated from Mississippi Home Corporation referral portal. HOME-ARP applicants/referrals must not be placed on the project/activity waiting list until:~~

- ~~3. Verification of QP eligibility has been obtained~~
- ~~4. The QP is document ready~~

## Application Process

#### 4. Initial Screening:

- All applicants must complete an initial screening to determine eligibility.

#### 5. Documentation:

- Applicants must provide necessary documentation to verify their eligibility.

#### 6. Completed application and waiting list:

- Eligible applicants submit a completed application form along with required documentation.

### Initial Screening

Before placing an applicant on the HOME-ARP waiting list, an eligibility screening and assessment must be completed. The assessment must consist of:

#### • Screening

- Asking specific questions to determine which QP. For example:

- QP 1: Where did you sleep last night
- QP 2: What's your current household income, when do you have to leave your current housing situation, and do you have somewhere safe to go if you must leave?
- QP 3: An oral statement during screening/assessment is acceptable. Minimal information to indicate their situation is acceptable.
- QP 4:
  - ✓ Where you previously homeless and currently in a temporary housing program? (P1)
  - ✓ What's your current household income and what is your current rent? (P2i)
  - ✓ What's your current household income? Do you have somewhere safe to go if you must leave? (P2ii)

### Documentation

- All eligibility documentation as described in the Recordkeeping section of this policy.

### Completed application and waiting list

#### Time and date

The date and time a QP referral is made will be documented. Additionally, subrecipients MUST document the date and time the QP was accepted to their project/activity waiting list.

Subrecipients must work with the QP to quickly obtain required documentation. The below documents timeline may be used by agencies to prevent any delays with accessing the waiting list.

#### 4. Case managers have 5 business days to collect eligibility documentation.

- a. Case managers must not rely on the QP alone to provide documentation, but they must help the QP obtain required documentation whenever necessary and possible.

- ~~5. If documentation is still pending after the initial 5 days, the case manager may follow up with the QP every 3 day for 15 days.~~
- ~~6. If there is no follow-up from QP after 15 days, the referral may be closed.~~

~~Subrecipients must document the date a referral is closed or rejected and the reason why that decision was made.~~

### **Accepting Referrals from the Waiting List**

~~Subrecipients waitlist process must be approved by MHC. The waiting list established by subrecipients from referrals received must document the date and time the household first presented for assistance and was placed on the waiting list. The waiting list will be used to determine the first-come, first-served order for supportive services and TBRA provided to QP households.~~

### **Maintaining the Waiting List**

~~Subrecipients must update their agency waitlist accordingly:~~

- ~~1. Regular Updates: The waiting list will be reviewed and updated regularly and timely to accurately record the date and time referrals are made.~~
- ~~2. Applicant Responsibility: Applicants are responsible for informing the agency of any changes in contact information or circumstances that might affect their eligibility.~~
- ~~3. Communication: The agency will communicate regularly with applicants to confirm continued interest and eligibility.~~

### **Removal from the Waiting List**

- ~~1. Voluntary Withdrawal: Applicants may request to be removed from the waiting list at any time.~~
- ~~2. Ineligibility: Applicants found to be ineligible based on updated information will be removed from the list and notified in writing.~~
- ~~3. Failure to Respond: Applicants who do not respond to communication attempts or fail to update their information may be removed from the waiting list.~~

~~Subrecipients must document the date an applicant was removed from the waiting list or rejected and the reason why that decision was made.~~

### **Appeals Process**

Applicants who believe they have been unfairly removed or not appropriately placed on the waiting list may appeal the decision. The appeals process includes:

- Written Appeal:
  - Submit a written appeal within 30 days of the notification of removal or placement.
  - Appeals must be submitted in writing to the subrecipient that made the denial/rejection.
- Review:

- Appropriate program management and/or subrecipient leadership staff will review the appeal and make a determination.
3. Final Decision:
- Applicants will be notified in writing by the subrecipient of the final decision within 30 days of the appeal submission.

Subrecipient must document all appeal and denial process in the applicants files.

## **Environmental Review**

The environmental review is an examination of the potential environmental impacts of a project to ensure compliance with the National Environmental Policy Act (NEPA) and all related laws and authorities. Sub-recipients must submit all available relevant information necessary for MHC's Environmental Impact Officer to perform an environmental review required by 24 CFR Part 50 and must carry out mitigating measures deemed necessary.

Sub-recipients may not expend any funds, regardless of source, on any project funded (except temporary emergency shelters) in whole or in part with an HOME-ARP subrecipient until the environmental review has been completed. Failure to comply with this requirement may result in cancellation of the sub-grant.

## **Duplication of Benefits (DOB)**

Duplication of Benefits (DOB) occurs when an individual or household receives financial assistance for the same service, during the same period, from multiple funding sources.

The HOME-ARP requires that the subrecipients complete the following analysis to avoid DOB

1. Assess the needs of the applicant.
2. Ask the applicant if they have received/receiving any additional support or any kind.
3. Calculate the unmet need
4. Document the calculation
5. Make sure all applicant subrogation forms are complete.

HOME-ARP funds may not be used to cover costs that have already been paid for or that will be paid for by another federal program or other sources. Subrecipients must determine and document if the household is receiving assistance from other sources (e.g. Housing Authority, CoC, Emergency Housing Vouchers, philanthropy, faith-based, CDBG-CV, etc.) to avoid duplication of benefits as well as verify that the other form of assistance does not disqualify the eligibility of the individual or household ([Section 312 \(42 U.S.C. 5155\)](#)).

To prevent a duplication of benefits, tenants and landlords are required to sign the Duplication of Benefits Certification which does the following:



- Provides a self-certification to the landlord and tenant indicating that they have not received a duplicative benefit;
- Request disclosure of any potentially duplicative assistance that they have already received, or reasonably anticipate receiving;
- Certifies that the landlord and applicant agree to repay assistance that is determined to be duplicative.

### **Use with other subsidies.**

Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, or rental/ deposits, rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance from another source. Rental assistance may not be provided to a program participant who has been provided with replacement housing payments under the URA during the period of time covered by the URA payments.

### **Case Management**

Case management is essential to assessing housing and service needs, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of program participants.

Determination of eligibility of a program participant for HOME-ARP, financial services must be conducted by the subrecipient through an initial consultation with a case manager. The case manager should be able to determine the **amount and types of assistance** the individual or family needs to regain permanent housing stability.

Case management is an eligible activity with HOME-ARP to ensure housing stability for participants. Case management time and eligible activities can be charged to the grant. The activity sheets and program notes must detail the work and amount of time dedicated to HOME-ARP. The activity worksheet is **MANDATORY for ALL staff members carrying out duties** for which the organization is requesting reimbursement.

Requests for reimbursement for ALL staff **MUST** be accompanied by an activity sheet, detailing the work they have completed in the component pertaining to HOME-ARP.

\*Please refer to the appendix for a sample Activity Sheet.

Note: An Activity Sheet is applicable if you are requesting salary reimbursement and accompanies each service/activity component that is listed on the Request for Cash. Please note a separate activity sheet is needed for each program where salary reimbursement is requested.

Case management activities provided through HOME-ARP Supportive Services to the QP (individuals/households) 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, and
- Develop a plan to assist the program participant to retain permanent housing after the HOME-ARP assistance ends, taking into account all relevant considerations, such as the program participant's current or expected income and expenses; other public or private assistance for which the program participant will be eligible and likely to receive; and the relative affordability of available housing in the area.

\*Supportive Services case management must not be offered as a conditional requirements for participant's acceptance of services and/or TBRA.

## Housing Engagement & Case Management

Housing stability case management includes approved housing placement activities identified with CPD-21-10 and this notice. Housing Relocation and Stability Services section (2) *Housing Stability Case Management*. Housing placement 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 and seeking relocation. Component services and activities includes:

- Waiting list referral
- Conducting the initial evaluation
- Developing, securing, and coordinating services
- Developing an initial housing and service plan.

## Individual Service Plan

The individualized service plan is a plan developed by case managers and participants and serves as a path to permanent housing stability. The initial plan should start at intake and assessment and may evolve over time. At minimum, the service plan should address:

- Housing
- Employment/Income
- Identified barriers to stability

## Case Management Best Practices

Services provided should be case management focus. Determining the best approach to case management can be difficult; however, there are several best practice case management models to consider when providing case management.

1. [Housing First](#)
2. [Critical Time Intervention](#)
3. [Motivational Intervention](#)

4. [Rapid Resolution](#)
5. [Trauma-Informed Care](#)
6. [Diversion](#)
7. [Rapid Rehousing: Housing Barriers Assessment](#)
8. Discharge planning
9. [Employment First](#)

## Termination of Assistance - Program Participants

### Termination of assistance

The subrecipient may terminate assistance to a program participant who violates program requirements or conditions of occupancy or no longer needs the services as determined by MHC. Termination under this section does not bar the subrecipient from providing further assistance at a later date to the same individual or family.

Program applicants may be terminated for from TBRA the following reasons:

1. Not disclosing any increases in income within 30 days.
  - a. The increase of income may not impact subsidy until recertification time.
2. Not complying with the rules of the lease in TBRA program.
3. Not informing subrecipient or leaser of changes in household size within 30 days which may impact TBRA assistance.
4. Not informing subrecipient that residence of changed.
5. Additional rules as set by the subrecipient. **All program rules must first be approved by MHC.**

### Due process

Subrecipients 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; and
- Prompt written notice of the final decision to the program participant.

During this process, the subrecipient must provide effective communication and accessibility for individuals with disabilities, including the provision of reasonable accommodations. Similarly, the subrecipient must provide meaningful access to persons with LEP.

## Client File Documentation

Program participants that are eligible for assistance must provide all applicable mandatory documentation to complete the application process. Subrecipients are required to upload the following documents to the client file, as applicable:

**1. Qualifying Population Verification (QP1, QP2, QP3, QP4)**

- See required documentation for QP under the [Recordkeeping](#) section of this notice and the Exhibits for Recordkeeping Requirements.

**2. Application/Assessment tool.** This document is to be completed by the case manager and signed by the program participant. The case manager must provide complete detail of how the program participant met one of the QP requirements. All information provided in the application should be certified as true and correct to the best of the parties' knowledge. Any application that is not signed by **both** the case manager and the program participant is not a valid document. The HOME-ARP application/assessment tool is **mandatory** for all program participants.

**3. Income verification.** HUD defines income as “any money that goes to, or on behalf of, the head of household or spouse (even if temporarily absent) or to any other household member”. Annual income includes the current gross income of all adult household members and unearned income attributable to a minor. The types of income to be counted include:

- Earned Income
- Self-Employment/Business Income
- Interest & Dividend Income
- Pension/Retirement Income
- Unemployment & Disability Income
- TANF/Public Assistance
- Alimony, Child Support and Foster Care Income
- Armed Forces Income

Annual income must be calculated using HUDs income calculation worksheet. The case manager must obtain verification of all income reported by the program participant. If the program participant has indicated previous employment but is not currently employed, the case manager must provide documentation from the previous employer or from unemployment compensation. **This documentation is mandatory for all program participants and adult household members.**

The following forms (as applicable) must be completed for income verification:

- Unemployment verification
- Self-Declaration
- Zero Income Certification (if the program participant was self-employed or without any income to report.)

- Income Calculation Worksheet
- Employment Verification

4. **Asset verification, if applicable.** Assets are defined as cash or material items that can be converted to cash quickly. They include 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 include:

- Amounts in checking and saving bank accounts.
- Stocks, bonds, savings certificates, money market funds, and other investment accounts.
- The cash value of trusts that may be withdrawn by the household.
- IRA, Keogh and similar retirement savings accounts, even when early withdrawal will result in a penalty.
- Lump sum receipts of cash received and accessible by household, such as inheritances, capital gains, lottery winnings, insurance settlements, and other claims.

Household assets generally are not counted as income, except for interest and dividend income. However, household assets should be taken into consideration when determining whether a household has other financial resources to obtain or maintain housing.

5. **Lease Agreement.** This document must :

- Be typed and signed.
- Clearly list all the parties to the lease;
- Provide terms and conditions;
- Have a beginning and ending date; and
- Be signed by all involved parties (landlord and tenant)
- For arrearage rental assistance, the lease agreement must be signed by all involved parties (landlord and tenant) prior to the application date.

If the lease has expired, it must have a clause addressing the continuance of the agreement on a month-to-month arrangement unless State law dictates that the lease automatically continues under a month-to-month or annual arrangement until the lease is renewed or is otherwise terminated. In the event the lease is extended on a month-to-month agreement, the landlord must still provide a written statement which clearly indicates this is month-to-month. The written lease agreement is mandatory for all program participants applying for HOME-ARP assistance. TBRA leases must be at minimum of 12 months.

6. **Eviction Notice, if applicable.** This document must be typewritten and include the date the applicant must leave the property, or the days before removal. The eviction notice must be signed and dated by the landlord or provided in a court order. This document is required for those “at risk” of becoming homeless.

- **Evictions from family/friends-** also called “Love Evictions” is acceptable if:

- i. It is signed and dated by the friend/family member
- ii. Evidence is provided proving that the friend/family member doing the eviction is the head of household for the unit
- iii. Evidence or a written statement or a written statement is provided to prove that the applicant resided permanently or temporarily in the unit at the time the removal is being requested.
- iv. **Individuals being evicted through a love eviction does not qualify for rent/rental arrears payments to their family/friend; however, if they meet a QP, they qualify for relocation to permanent housing.**

7. Affidavit of Rental Arrears- Must be signed and dated by the landlord and indicate:

- The amount of rent due,
- The amount and time of delinquent rent
- days.

8. **Rent Reasonableness checklist & FMR.** Rent reasonableness should be determined by considering the following:

1. The reasonableness in relation to rents being charged for comparable unassisted units, taking into account the location, size, type, quality, amenities, management, and maintenance of each unit; and
2. The rent should not be in excess of the rent currently being charged by the same owner for properties (if comparable to the unit in which the participant will be leasing) as well as those actual rents charged.

Rent reasonableness must be determined for all units for which rental assistance, arrears and/or security deposit assistance is being provided. If the rent for the unit does not meet rent reasonableness, then HOME-ARP funds cannot be used to assist the household in that unit. Furthermore, these funds cannot be used to pay the rent up to the rent reasonableness standard, while the tenant pays the remainder. This document is mandatory for all program participants. All subrecipients must ensure their Written Standards include standards for how their agency will document rent reasonableness.

See the **Housing and Rent requirements** section of this manual to determine how to calculate Rent Reasonableness.

9. **NSPIRE- Habitability Standards.** These standards apply when a program participant is receiving financial assistance and moving into a new (different) unit, as well as homelessness prevention.

Inspections must be conducted upon initial occupancy. This document is mandatory for all program participants.

10. **Lead-Based Paint, if applicable.** All subrecipients funded with HOME-ARP funds must follow minimum standards for compliance with the lead-based paint remediation and disclosure requirements identified in 24 CFR Part 35 including the Lead-Based Paint Poisoning Prevention Act, the Lead-Based Paint Hazard Reduction Act of 1992 and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M and R. All subrecipients must include in their Written Standards policies and procedures on how they will document need for and inspections for lead-based paint.

An example checklist (see Appendix) is included as a tool to guide grantees through the lead-based paint inspection process to ensure compliance. HOME-ARP staff may use this checklist to document any exemptions that may apply, whether any potential hazards have been identified, and if safe work practices and clearances are required and used. This document should be kept in each program participant's file.

11. **Affidavit of Arrears, if applicable.** This document must be signed and dated by the landlord and provide the specific amounts and the number of months that the tenant has failed to pay rent. This document is required for those "at risk" of becoming homeless.
12. **Rental Payment Ledger, if applicable.** This document must come from the apartment management and must be in alignment with the affidavit of arrears. If the tenant is renting from a homeowner, this information may not be available, so the affidavit of arrears will be enough. This document is required for those "at risk" of becoming homeless.
13. **Termination of Assistance, if applicable.** If a program participant violates program requirements, the subrecipient may terminate the assistance in accordance with a formal process established by the subrecipient that recognizes the rights of individuals affected. The agency must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases.

To terminate rental assistance or housing relocation and stabilization services to a program participant, the required formal process, at a minimum, must consist of:

- 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 who made or approved the termination decision; and
  - Prompt written notice of the final decision to the program participant.
- Subrecipients must provide in their Written Standards a description of their formal termination process.

14. **Check.** A copy of the check showing that the sub-recipients have paid the property owner/landlord. Subrecipients must also provide bank statements with canceled checks paid to landlords and vendors on a quarterly basis.
15. **VAWA.** Must be included in all rental agreements and housing assistance contracts. Subrecipients policies must include VAWA and an established Emergency Transfer plan that works.
16. **Confidentiality/ Privacy Statement.** This document must be uploaded in the HMIS file under the client number.

## Re-Evaluation

Subrecipients are required to re-evaluate the participant’s eligibility and the types and amounts of assistance needed if they are to receive ongoing assistance.

Reevaluation of the program participant’s continued eligibility must include:

- Detailed case notes showing the program case manager’s assessment of eligibility (i.e. monthly rent payment).
- Case notes must be completed and uploaded to the program participant’s file, prior to submitting the Request for Cash.

## Income Re-evaluation timeline

Component	Frequency of Re-evaluation - not less than once
TBRA	annually
Supportive Services	every 3 months

## Program Participant Confidentiality and Privacy Policies

Each subrecipient must incorporate into their policies and procedures a process that will ensure the confidentiality of applicant’s/program participant’s identifying information; records pertaining to any individual or family provided family violence prevention; and treatment services offered under any project



assisted with HOME-ARP funds. Furthermore, the address or location of any shelter for victims of domestic violence programs must 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.

The subrecipient must provide the program participant with a confidentiality and privacy policy form, which is signed and dated in the participant file.

## **Grievance and Appeals Process**

Subrecipients are required to have an established process for addressing program participant's grievances for decisions, including termination or reduction of benefit, denial of benefit or other grievances. At a minimum, the process must include the following components:

- Informs the participant/applicant of the policy and documents participant/applicant acknowledgment of grievance and appeal procedure in the client's file;
- The grievance and appeal language will accompany all denial, reduction, and termination documentation.
- Informs the participant/applicant that they may contest and appeal any decision that denies (for any reason) or limits eligibility of participant/applicant and/or terminates or modifies any benefits;
- Allows any aggrieved person a minimum of thirty days within which to request an administrative review;
- Informs the applicant/participant of their right to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the decision;
- Informs the applicant/participant and MHC in writing of the final determination and basis for the decision within ten days of the determination. Any person or persons designated by sub-recipient can complete the administrative review, other than the person who made or approved the decision under review or a subordinate of this person. MHC retains the right to require modification of any review or appeals process that in its determination does not meet basic principles for notification, instruction, time allowance, impartiality and access.
- Subrecipients must make accommodations for clients who have language or disability barriers that would prevent them from participating in the appeals process.

## **Conflicts-of-Interest**

Subrecipients engaging in any of the activities defined this Notice shall be subject to the conflicts of interest provisions at 24 CFR 92.356, including but not limited to the conflicts of interest exception process defined in 24 CFR 92.356(d)-(e). Owners and developers of HOME-ARP NCS and HOME-ARP rental housing shall be subject to 24 CFR 92.356(f). Additionally, conflict of interest provisions listed at 2 CFR 200 is to be incorporated.

HUD guidance states "no person who exercises or has exercised any functions or responsibilities with respect to activities and projects under the HOME-ARP 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 any 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”.

The state issued guidance which expanded the definition of relative to include a “spouse, child, parent or any person related by blood or marriage within the third degree”. This definition is based on the Ethics in Government Act and the state nepotism statute. It is the responsibility of the Grant Administrator to properly disclose the conflict-of-interest provision to interested participants. If it is found that a conflict-of-interest has occurred, the grant recipient may be required to repay program funds, using non-federal funds. Failure to repay the funds may result in termination of participation in any future HUD funded programs. There will be no exceptions to this guidance granted by MHC.

### **Organizational Conflicts of Interest:**

The provision of any type or amount of HOME-ARP TBRA or Supportive Services may not be conditioned on an individual’s or family’s acceptance or occupancy of a shelter or housing unit owned by the subrecipient; or a parent, affiliate, or subsidiary of the subrecipient. No subrecipients may, with respect to individuals or families occupying housing owned by the subrecipient, or any parent, affiliate, or subsidiary of the subrecipient, administer financial assistance that includes rental payments, utility deposits, security deposits, or first and last month’s rent provided pursuant to the HUD CPD-21-10 Notice. All contractors of the subrecipient must comply with the conflict of interest requirements.

### **Written Standards**

Sub-recipients are required to develop their own written standards for the use and distribution of HOME-ARP resources. These written policies and procedures will vary among subrecipients; however, they must all be written in accordance with federal regulations as well as MHC requirements. All policies must include:

- VAWA requirements.
- Agencies must also have written personnel and fiscal policies.
- Fair Housing Equal Access policy
- Civil rights
- Nondiscrimination
- Other appropriate policies required by federal regulations

### **Written Standards of Conduct:**

Subrecipients must maintain written standards of conduct covering conflicts of interest and organizational conflicts of interest requirements under this Notice, CPD-21-10, and 2 CFR 200.318. Agency written standards must include:

- Code of conduct

- Conflict of interest
- Internal controls
- Waiver, Use, and Abuse
- Fraud

## PROGRAM IMPLEMENTATION

### Implementation Process

Subrecipients should view the implementation of a project as a continuous learning process. All staff of subrecipients should be knowledgeable of program requirements. Communication with MHC Staff, review of policy statements and instructions, attending workshop events conducted by MHC and a thorough review of this manual should assist in developing a strong knowledge base of the program.

The following summarizes the implementation process:

- MHC provides contracts/agreements to subrecipients and conducts the implementation workshop to provide guidance and materials necessary to implement a project.
- Subrecipients should begin the environmental review process immediately to meet the necessary federal requirements and timelines. If the activity is exempt from Environmental Review due to HOME-ARP eligible program exemptions, subrecipients must complete an Environmental Review exempt form.
- Subrecipients should begin the procurement process for all services required for the project. Instructions for this process are outlined in the [procurement](#) section of this manual.
- Subrecipients must submit to MHC the documentation necessary to allow Contract Special Conditions clearance.
- Subrecipients must submit to MHC a Signatory Authority Letter for future Requests for Cash and program reporting. There should be **no more than two (2) authorized** signatories.
- Subrecipients must establish a financial management system that identifies the activity and line item budgets contained in the contract. The amount of funds approved in the contract budget will be closely monitored to avoid exceeding the allocated limits.
- Subrecipients must establish a recordkeeping system for the project.

## Implementation Workshop

MHC will host a mandatory implementation workshop following an award of funds or the notice of funding award. Subrecipients will be notified in writing of the date, time and location of the workshop.

## Grant Agreement

Upon being awarded funds, a grant agreement is executed between Mississippi Home Corporation and the subrecipient for the award amount and selected activity. The agreement is a very important document throughout the life of the project. It identifies the description of the activities funded, budgeted costs, general terms and conditions, and any special conditions which must be met before the MHC will release funds.

The agreement contains the following:

Signature Sheet	The Signature Sheet identifies the sub-recipient, effective dates of the contract, grant number, amount of funds awarded, and the attachments detailed below. This sheet is signed by senior management of Mississippi Home Corporation and requires the signature of the chief executive officer of the sub-recipient.
Special Conditions	The environmental regulation is the only special condition that requires written clearance.
General Terms and Conditions	The terms and conditions cite program authority, rules, and regulations pertinent to all HOME-ARP Grants.
Assurances	Compliance with the assurances is committed to by the signature of the chief executive officer of the subrecipient in the original project application. The sub-recipient contract signatory should carefully review all assurances prior to signing the contract, as that office is ensuring compliance with all applicable laws, regulations and other requirements of the HOME-ARP program.
Budget	This section of the contract reflects the funds allocated to each project activity area. Subrecipients not sure of an eligible expense should contact MHC Staff for clarification prior to making a commitment of funds. Although not intended to be exhaustive, the following list of allowable program activities is included in the contract.

The term of the agreement will be outlined under “Project Period Beginning and Ending Dates”. Extensions and budget modifications may be considered by MHC on a case by case basis.

## Grant Modification

Subrecipients must submit to MHC a written request for program extension and/or budget modifications

with an explanation of why an extension is needed. Request to modify the contract must be submitted on agency's letterhead, and budget modification requests must include appropriate budget and unit of service form/worksheet. If a requested change is found to be advantageous to the project, MHC will prepare the necessary final documents for review. Once the agency has received copies of the executed revised agreement, the requested action may proceed.

MHC must approve all changes prior to local action. Noncompliance may result in ineligible costs and may result in the repayment of grant funds.

## Effective Date of Award

All Grant Agreements will require signature by MHC and the Executive Director of the subrecipient to become fully executed. When fully executed, the subgrant awards are effective as of the date indicated with MHC's signature unless HUD waivers apply.

HOME-ARP contracts term will follow the fiscal year of July 1<sup>st</sup> – June 30<sup>th</sup> unless otherwise modified by the contract.

Funds are available for use after:

- A budget has been approved by MHC;
- The contract/agreement has been fully executed;
- The start of the performance period; and
- The Environmental Review has been completed.

Expenses incurred prior to the completion of any of the above four milestones will not be reimbursed and may result in cancellation of the sub-grant, unless approved in writing by MHC.

## Performance Period

### Annual HOME-ARP

The performance period for each annual HOME-ARP subgrant is twelve (12) months (July 1<sup>st</sup> – June 30<sup>th</sup>). Subrecipients must provide services to QP for at least the period during which HOME-ARP funds are provided.

## FINANCIAL MANAGEMENT

### Budget

HOME-ARP subrecipients must propose a budget based on the actual amount awarded. The budget must be approved by MHC prior to any reimbursable expenditure. **Reimbursement will not be made for activities that are not specified in an approved budget even though such activities may be**

## **classified as an eligible activity.**

MHC requires subrecipients to receive MHC's written approval prior to making contract amendments, modifications, or extensions. For MHC to consider a contract change, the subrecipient must submit an explanation of the need for the change with the executive director's signature. Some changes to original contracts may require the re-evaluation of an applicant's eligibility and could result in funding being withdrawn. The subrecipient will be notified in writing when the State cannot approve a requested revision.

A request for budget modification must be submitted on agency's letterhead, and budget modification requests must include appropriate budget and unit of service form/worksheet. A request for budget modification must include the executive director's signature and a detailed allocation of funds. If approved, a modification of the contract budget will be prepared by MHC and submitted to the subrecipient for signature. Budget modifications may include the creation of budgets for new activities/line items and/or the transfer of funds among existing budgeted activities/line items. All budget modifications require written MHC approval.

## **Administrative Costs**

Administrative costs will be used for costs related to the planning and execution of the HOME-ARP activities. The total amount for administration will be 15 percent of the total allocation of HOME-ARP funding grant. Match funding for this activity will be provided under other HOME-ARP funded activities (i.e. TBRA, Supportive Services). Administrative dollars will be retained by the MHC. MHC reserve the write to admin changes to the administrative allowability to include subrecipients if deemed necessary based on need.

## **Subrecipient Financial Management Requirements**

- Signatory Authorization Letter that identifies authorized parties responsible to sign Request for Cash and reporting documents;
- The subrecipient must submit their approved Financial Management policy to MHC;
- The subrecipient shall submit the internal control policy for the request for cash as a section of the Financial Management policy;
- The procedures submitted must correspond with the submission of each Request for Cash.
- Subrecipients must submit results of their annual Financial Accounting Audits as required by 2 CFR part 200 if applicable.

## **Requests for Cash**

Funds are requested by using the Request for Cash form and the Consolidated Support Sheet which can be viewed on MHC's website at [www.mshomecorp.com](http://www.mshomecorp.com). These forms must be accurately completed, or the request will be returned to the sub-recipient. All forms that require a signature must be signed for the

Request for Cash to be reviewed and processed.

Prior to drawing down funds, the sub-recipient must have completed the following:

- Grant Agreement executed and returned to MHC;
- Environmental Review Record Clearance;
- Clearance of all contract special conditions;
- W9 Form submitted to MHC;
- Approved signatory form

### Submission Requirements

- Requests for cash must be submitted by the 15<sup>th</sup> of every month for the previous month's activities. **RFCs "service rendered" period must not be longer than 30 days and must be in chronological order. IF YOU CHOOSE TO SUBMIT MORE THAN ONE HOME-ARP REQUEST A MONTH, ON REQUEST MUST BE SUBMITTED ON THE 15th AND THE SECOND ON THE 30th OF THE MONTH.**

Requests for reimbursements must be submitted within sixty (60) days of services provided. *Example: If you are submitting an RFC for 08/01/2023-08/31/2023, your request for reimbursement documentation must be dated between August 1, 2023 - October 31,2023.*

- Requests for Cash for annual HOME-ARP must be emailed to [homearp.rfc@mshc.com](mailto:homearp.rfc@mshc.com). RFCs will **not be accepted** if they are sent to any other email address.
- MHC is required to make timely payments to each of its subrecipients within 30 days after the date of receiving the subrecipient's complete and approved payment request. If the sub-recipient submits an incomplete or incorrect request for payment, staff will make notification via email and return the request as necessary.
- Once the submitted RFC is approved, payment to a recipient will be made through an automatic deposit to the account identified by the agency.
- Agencies are recommended to have a separate bank account for the HOME-ARP program for reporting and compliance purposes.

### Request for Cash Form Instructions

The Request for Cash (RFC) form is used by subrecipients on a cost reimbursement basis to requisition funds. All applicable sections of the form must be complete.

### Request for Cash Submission Process

- 1) Agencies are required to submit an RFC for the awarded grant at minimum of one a month.

- 2) Agencies must submit all RFC by 15<sup>th</sup> of each month. If the 15<sup>th</sup> falls on a weekend, the RFC must be submitted the following business day.
- 3) Agencies are required to submit verification of payment to vendors identified on the RFC.
  - a. For example, cancel checks (front & back) or bank statements.
- 4) Cost incurred on the RFC must be during the agency's contract period.

## **Section A: General Information**

### **Recipient**

Name of Sub-recipient (selected from the drop-down menu)

### **Mailing Address**

Sub-recipient's mailing address is automatically populated based on the sub-recipient.

### **Street Address**

Sub-recipient's street address is automatically populated based on the sub-recipient.

### **City, State Zip**

Sub-recipient's City, State Zip is automatically populated based on the sub-recipient.

## **Section B: Project Information**

### **Grant No.**

Provided by MHC based on the Program Year

### **Contract No.**

Provided by MHC based on the Program Year, Program and Sub-recipient.

### **Project No.**

N/A

### **Services Rendered**

This period must fall within the contract period and the timeframe in which costs occurred. The dates provided in this field are the dates that purchases were made or the dates that an action became known to the sub-recipient (i.e., mail date, invoice date). The Services Rendered period cannot overlap state or subrecipient fiscal years.

### **Request No.**

The draw number for the contract

### **MHC Staff Initials**

To be completed by MHC staff.

## **Section C: Request per Activity**

### **Activity Description**

HOME-ARP Activity Components are TBRA and Supportive Services.

### **Budget Amount**

The budget amount for each activity will be based on the amounts approved in the Grant Agreement.



**Total Prior Request to Date**

Total amount of funds previously disbursed for each activity.

**This Request**

Total amount of funds being requested for each activity.

**Remaining Balance**

Total amount of funds remaining for each activity after the current request.

**Unit of Service**

The total number of clients receiving services for “This Request”.  
If the request is admin and staff only, no units of services should be provided.

**Activity Numbers**

Number assigned in IDIS for each activity.

**Required Accomplishment Narrative:**

Total number of persons served during the service period.

**Signatory Section**

**Is this your final request for cash on this contract?**

Must check “Yes” if there will be no future requests on this contract.

**Signature of Authorized Official**

The authorized official who must sign the Request for Cash (RFC) must be the same official who signed the contract or the approved authorized signatory official.

In case of signatory designation, an authorization letter will be required to be on file with Mississippi Home Corporation. The authorized official responsible for signing the RFC should not be the same as the preparer of the document. There should be a clear separation of duties.

**Typed Name and Title of Authorized Official:**

Name and Title of authorized signer must be typed on form.

**Date Signed**

Date Request of Cash form signed by authorized officials.

**Prepared by**

Name of person preparing the Request for Cash form. This should be the person most familiar with the data reported, in case of questions. The Preparer of the RFC should not be the same as the authorized official responsible for signing the RFC. There should be a clear separation of duties. This signature can be typed in.

**Preparer’s Telephone No.:**

Telephone number of the person preparing the RFC form.

**Date Prepared**

Date Request of Cash form prepared by the Preparer.

## Consolidated Support Sheet Form Instructions

The Consolidated Support Sheet is provided to the subrecipient for use in documenting the cost proposed for reimbursement in the Request for Cash. It allows the subrecipient to report individual cost incurred per each activity area and to tie that cost by invoice numbers to support documentation. This support sheet allows a sub-recipient to maintain budget balances of activity area costs, federal expenditures, matching contributions, and total expenditures. Completed Consolidated Support Sheets are to be submitted each time a Request for Cash is submitted to MHC. Cost reported must equal the amount requested and disbursed. **No Request for Cash will be processed if the Consolidated Support Sheet and the Cumulative Support Sheet is not attached, signed and completed correctly.** The Request for Cash will be returned to the sub-recipient and must be re-submitted when completed or corrected. A duplicate copy of each Request for Cash must be retained in the subrecipient's file.

*General instructions are as follows:*

### Program

Name of Program funds are being requested

### Recipient

Name of Sub-recipient

### Request for Cash Number

Draw request number for this contract

### Contract Number

Provided by MHC based on the Program Year, Program and Sub-recipient.

### Total Amount Requested

Automatically calculated field based on data entered for each line item.

### Date

Date of activity.

### Line Item

Description of the eligible cost for the activity.

### ID #

The activity number assigned based on the Request for Cash form.

**For participants receiving assistance, please submit only the ID number associated with the participant not the name.**

### Vendor Name / Invoice Number

Enter the individual vendor name, month of payment and corresponding vendor invoice numbers, ID numbers or names of program participants to reference attached cost documentation.

### CAPER Category

The sub-category for an activity.

### Date Expense Started, and Date Expense Ended

This is the date service range.

### Total Invoice

Total amount of the invoice.

### Amount of This Request

Amount of funds being requested for reimbursement for each line item.

### Appendix: must be labeled A-Z, AA-AZ..

- Supporting documentation for all requests must be provided.
- Each requested line must include appropriate appendix and supporting documents.
- If you are using multiple grants and your requested amount is different than the invoice amount, a typed explanation and breakdown must be included in the appendix.
  - Handwritten breakdown and explanations on the invoice **will not** be accepted.

### Amount Budgeted

Total amount budgeted for each activity based on the contract.

### Amount Requested to Date

This column contains previously approved and presently requested federal cost. This amount must match the amount showing in IDIS for this activity. If the prior amount requested is incorrect. The RFC will be returned to the subrecipient for correction. The changes must be initiated by the signer also. An entry is made of the previously approved federal reimbursement activity total on the same row as "Amount Budgeted" for requests other than the initial. Entries are made for each federal cost item in the same amount as was shown for that item under "Amount of This Request". These cost entries will automatically inhabit the Balance column and be deducted from the activity area balance.

### Balance

Automatically calculated field based on the "Amount of This Request" column.

### Grand Total

Activity Area Totals will automatically inhabit the "Total" row for respective activity areas. From these activity totals a grand total will automatically inhabit the "Grand Total" row for each column.

### Service Rendered (Beginning and Thru)

Automatically populated from the Request for Cash form.

### Cumulative: Program Expenditures

(Federal Share) The total amount of federal funds requested to date for all activities. This should equal the grand total for "Amount Requested to Date".

### Cumulative: Matching Expenditures

(Match Share) The total amount of matching funds reported to date for all activities. This should equal

the grand total for the match column.

**Total Expenditures**

Enter the sum of the cumulative program expenditures and the cumulative matching expenditures reported to date.

**Typed Name and Title of Authorized Official**

Enter the name of the authorized official who must sign the Request for Cash. This is the same official who signed the contract or an approved authorized signatory official. In case of signatory designation, an authorization letter will be required to be on file with Mississippi Home Corporation.

## Mississippi Home Corporation RESPONSIBILITIES

1. The program staff shall process Requests for Cash/Consolidated Support Sheets and forward the documents to the MHC Finance Department. The total process time for each RFC is within 30 days of a **correctly submitted** Request for Cash.

In the event of questions, errors, or discrepancies regarding submitted document(s), the MHC staff shall contact the designated subrecipient financial officer to discuss the issue. **The staff will not make any corrections or other changes to the Request for Cash and/or Consolidated Support Sheets. It is the subrecipient's responsibility to submit a true and correct documentation.**

2. All Requests for Cash/Consolidated Support Sheets submitted by the subrecipient shall be maintained by both the HOME-ARP staff and the Finance Department of the MHC.

## SUBRECIPIENT RESPONSIBILITIES

1. The Request for Cash shall always be accompanied by the Consolidated Support Sheet and invoices to support all costs.
2. At least one Request for Cash must be submitted monthly. You may submit more than one after approval, but you must submit AT LEAST one month.
3. A Request for Cash must not include cost incurred during two of the subrecipient State's fiscal years. An individual cost falls into the fiscal year in which it is incurred based on the invoice date.
4. Costs eligible for reimbursement must be incurred during the contract period.
5. Requests for Cash MUST include documentation to support matching expenditures. When additional documentation or clarification is requested from the subrecipient, it must be submitted before the next request for cash will be processed. NO Additional Request for Cash Reimbursement will be processed, until outstanding items are resolved.

Request for Cash proper documentation must include

- Receipts for all purchases for which reimbursement is requested.
  - Proof of payment for all items for which reimbursement is being requested (i.e. payment check copies, credit card statement showing purchases, zero balance receipt showing the payment type.)
6. The subrecipient is responsible for providing a CAPER Summary Report monthly. This shall include beneficiary and financial reporting. Failure to submit these documents monthly will result in a delay of processing the Request for Cash.

## Internal Reviews for Requests for Cash

### Purpose

The purpose of internal reviews is to examine request for cash requests received from subrecipients and to provide objective and independent assurance of the existence, accuracy, completeness, and eligibility of the items requested for reimbursement in all material respects.

### Periodic Review

Reviews will initially be conducted quarterly. On-going reviews will be semi-annually or more frequently based on prior findings and/or risk assessment. Reports will be issued semi-annually and will cover two reviews.

### Scope

Review procedures should be sufficient to establish the following in all material respects.

- 1) No duplicates in reimbursements based on the beneficiary or the subrecipient
- 2) Existence of the beneficiary and existence of the expenditure
- 3) Accuracy of the expenditure
- 4) Completeness of the supporting documents
- 5) Eligibility of the person and of the expenditure

### Independence and Objectivity

The review will be conducted independently and objectively without regard to the subrecipient.

### Method

- 1) Payment will be made based on Request for Cash (RFC) requests submitted by the subrecipients for reimbursement of eligible expenses.

### Sample Selection

- 1) A random nonstatistical sample will be selected based on the assessed risk of the subrecipient and the results of past reviews.
- 2) The sample will be selected from the Consolidated Support Sheets submitted as support for the Request for Cash.

### Review

- 1) All items are tested against required documentation and support sufficient to cover the scope described above.
- 2) After the completion of the quarterly review, all findings will be provided to the subrecipient's executive director for review. The subrecipient will then have **5 working days** to provide a written response or to cure the findings.
- 3) Once all review responses have been received from the subrecipient, a final determination will be made on each finding and a semi-annual report will be issued after the completion of two quarterly reviews.

- 4) If the findings are deemed sufficient in severity and/or demonstrate a trend, after the issuance and approval of the final report, the amount of the findings will be projected over the population and funds will be recaptured. The formula used to calculate the amount of the recapture when projected over the populations is as follows: *Error Amount in Dollars / Sample Amount in Dollars X Total Dollars of the Request for Cash.*

## **Reporting**

- 1) A draft report will be completed detailing the results of the review and the recapture of funds if any, will be detailed.
- 2) Any recapture of funds will be deducted from the subrecipient's next RFC.

## **Performance Reports**

Each subrecipient must report on the required HOME-ARP data elements timely.

- 1) For HOME-ARP TBRA activities under this Notice, the subrecipient must report beneficiary information to MHC at the time assistance is provided.
- 2) For HOME-ARP Supportive Services activities under Supportive Service section of this Notice, the subrecipient must report MHC quarterly, by the 14th day after the end of each calendar quarter, on the number of homeless and not homeless households assisted with supportive services and housing counseling, including the race and ethnicity, household size, and household type of the households assisted.
- 3) Subrecipients must use required reporting form.

## **Integrated Disbursement and Information System (IDIS)**

IDIS is HUD's financial management system through which funds are drawn down and reports on performance data for HUD.

Supportive Services Homeless Households												
Total	New Household	Veteran	Hispanic	Race								
				White	Black	Asian	American Indian/Alaskan Native	Native Hawaiian/Pacific Islander	Other/Multi-Racial			
Household Size								Household Type				
1	2	3	4	5	6	7	8+	Single, non-elderly	Elderly	Single Parent	Two Parents	Other

Supportive Services Non-Homeless Households												
Total	New Household	Veteran	Hispanic	Race								
				White	Black	Asian	American Indian/Alaskan Native	Native Hawaiian/Pacific Islander	Other/Multi-Racial			
Household Size								Household Type				
1	2	3	4	5	6	7	8+	Single, non-elderly	Elderly	Single Parent	Two Parents	Other



TBRA Homeless Households												
Total	New Household	Veteran	Hispanic	Race								
				White	Black	Asian	American Indian/Alaskan Native	Native Hawaiian/Pacific Islander	Other/Multi-Racial			
Household Size								Household Type				
1	2	3	4	5	6	7	8+	Single, non-elderly	Elderly	Single Parent	Two Parents	Other

TBRA Non-Homeless Households												
Total	New Household	Veteran	Hispanic	Race								
				White	Black	Asian	American Indian/Alaskan Native	Native Hawaiian/Pacific Islander	Other/Multi-Racial			
Household Size								Household Type				
1	2	3	4	5	6	7	8+	Single, non-elderly	Elderly	Single Parent	Two Parents	Other

## Grant Renewal and Grant Funding Probation

Agencies not able to meet the annual expenditure goals will be placed on a grant probation the following year. Agencies on grant funding probation may receive a renewal contract; however, they must meet the expenditure goal by the end of that grant term. If the agency on grant funding probation is unable to meet the expenditure goal by the end of the probation year, their contract will not be considered for renewal.

Agencies not meeting their expenditure goals by the end of the grant year 2027 will not be renewed and will be required to expend their remaining funds by the contract deadline. MHC reserves the right to award reduced contracts to agencies not meeting expenditure goals based on the community needs.

## HOME-ARP Recaptured Funds

The Corporation may recapture funds previously awarded to a HOME-ARP recipient. The Corporation may reallocate any recaptured funds to agencies receiving HOME-ARP funds and providing like services. Requests for supplemental funds will be considered on a case- by-case basis with funds granted only in those instances where the Corporation can readily determine that additional funding is justified.

## MONITORING AND CLOSEOUT PROCEDURES

Compliance with regulatory and programmatic requirements of the HOME-ARP subgrant is generally determined through on-site monitoring and desktop monitoring by MHC. Monitoring concentration will include, but is not limited to, financial management, administrating and carrying out HOME-ARP activities, and eligible beneficiaries. Monitoring will generally be conducted after advance notice and at a date and time convenient to both MHC and subgrant recipients but may be conducted without notice and at any normal hour of business operation at the discretion of MHC. Pop-up monitoring if the agency is determined at High-Risk and in noncompliance with regulations.

MHC and HUD is still compiling documents for HOME-ARP monitoring. However, when preparing for a monitoring visit, ensure that agencies policies, HOME-ARP funded activity's, and files are in line with [CPD ESG monitoring](#) guide Chapter 28 and this manual, TBRA may follow rental monitoring guidance identified in the [CPD HOME monitoring](#) guide Chapter 7 and this manual. MHC ESG monitoring checklist for client files is available at <https://www.mshomecorp.com/federal-programs/forms/>.

HOME-ARP's monitoring process is a procedure for ensuring that the project sponsors are adhering to the federal and state regulations. The objectives of the monitoring processing are:

- to assist the project sponsor in carrying out its project in a timely method;
- to identify probable problem areas and to assist the project sponsor in complying with applicable laws and regulations;

- to assist project sponsor in resolving compliance problems through discussion, negotiation, or provision of technical assistance;
- to determine if each project sponsor complies with activity costs which are eligible under appropriate laws and regulations;
- to ensure the project sponsor is carrying out activities as described in the application submitted for funding;
- to offer adequate follow-up measures to ensure that performance and compliance deficiencies or problems are corrected by the project sponsor
- to determine if the project sponsor is leading the project with adequate control over program and financial performance, and in a way, which minimizes the chance for mismanagement;

## I. Selection/Risk Assessment-

A “risk assessment” (also called **risk analysis**) shall be conducted on all subrecipients. This technique will establish the priorities for monitoring and to determine where resources can be best applied. The risk analysis can determine which project sponsor should be monitored, the program areas to be covered. The selection process would ensure that the HOME-ARP subrecipient are conducting the project with adequate control over the program and financial performance which eliminates the chance for mismanagement, fraud or waste.

Subrecipients should be selected for monitoring within each program and technical area using general risk factors of *program complexity, project sponsor capacity, recent problems, and past performance*.

- A. Program Complexity
  - Projects undertaken by sub-recipients
- B. Project Sponsor Capacity
  - Inexperienced staff
  - No progress
  - Low productivity
  - Difficulty in carrying out the program
- C. Recent Problems
  - Incorrect or incomplete performance reports
  - Audit findings or no audit at all
  - Program participants complaints
  - Issues remaining from previous grant cycle year
  - Issues identified on the RFC
- D. Past Performance
  - Frequent audit findings or RFC concerns.

## II. Scheduling

The subrecipient will be notified, in writing prior to the monitoring visit unless the monitoring visit is a Pop-Up monitoring visit. The notification includes the following:

- the date and time of the on-site review

- name(s) and number(s) of the person(s) conducting the review
- purpose of the review
- a list of documents to be reviewed (these documents should be readily available)
- a request that the subrecipient's representatives and other appropriate staff be available during the review (i.e., financial staff, etc.)

### III. **Unscheduled/Pop-up Monitoring/Visits**

Mississippi Home Corporation (MHC) reserves the right to conduct unscheduled "pop-up" monitoring of subrecipients' grants awarded by MHC. Subrecipients must always be prepared and manage their programs with the expectation that monitoring can occur at any time. Therefore, it is imperative that all appropriate files, documentation, policies, reimbursement records, and program-specific records are kept secure, organized, and up-to-date.

Lack of prior notification is not an acceptable excuse for non-compliance with program requirements. Any issues identified during a pop-up monitoring will be formally documented as findings/concerns against the subrecipient.

### IV. **On-Site/Desk Monitoring**

The MHC's HOME-ARP representative will monitor the terms and conditions of its contract with the project sponsor. This includes: rate of expenditures, eligibility of expenses and supporting documents, and implementation of eligible activities under the HOME-ARP Program.

#### I. Monitoring Preparation

The monitoring review involves the completion of a standardized monitoring review form, which requires the following:

- A review of the program files
- A review of the program policies and procedures
- A spot review of the requests for cash and supporting documentation.

#### II. Monitoring Review

##### **On-site Visit**

- An initial and exit interview will be held with the Subrecipient Representatives. A series of questions will be asked relating to the capacity of the organization, program effectiveness, contractual compliance and any recent changes that the organization has endured.
- MHC representative will review a sample of client files thoroughly to ensure eligibility compliance with all federal regulations. Incomplete files will be noted.
- Documents will be reviewed to verify that the organization is keeping appropriate and sufficient records. MHC reserves the right to have access to any financial back-up documentation to determine whether unnecessary or unreasonable expenditures occurred.
- MHC HOME-ARP representative will review proper documentation on client's eligibility and disbursements.

- MHC HOME-ARP representative will review the environmental clearance will be verified to certify that the subrecipient is following federal and state regulations relative to environmental activities in federally assisted grants.
- The procurement process will be reviewed to check for compliance with federal and state guidelines relative to the procurement of supplies, equipment, construction, and services for federally assisted grants.
- MHC will collect most updated financial audits and policies as needed.
- On-site visits of a large project may continue to a desk monitoring.

#### **Desk Monitoring**

- MHC representative will review a sample of client files thoroughly to ensure eligibility compliance with all federal regulations. Incomplete files will be noted.
- Documents will be reviewed to verify that the organization is keeping appropriate and sufficient records. MHC reserves the right to have access to any financial back-up documentation to determine whether unnecessary or unreasonable expenditures occurred.
- MHC HOME-ARP representative will review proper documentation on client's eligibility, rent restrictions, and disbursements.
- MHC HOME-ARP representative will review the environmental clearance will be verified to certify that the project sponsor is following federal and state regulations relative to environmental activities in federally assisted grants.
- The procurement process will be reviewed to check for compliance with federal and state guidelines relative to the procurement of supplies, equipment, construction, and services for federally assisted grants,
- MHC will collect most updated financial audits and policies as needed.

### III. Monitoring Report

- MHC will email or mail a Monitoring Review Results letter to the project sponsor after monitoring visit. The letter will include the strengths and weaknesses of the organization. Also, if there are any deficiencies that need corrective action, it will be included in the letter. A deadline will be given to the project sponsor to clarify all deficiencies for compliance (i.e. a follow-up visit, written response, etc.). If there are no findings (deficiencies), a compliance letter will be emailed or mailed to the project sponsor.

No response or if the subrecipient fails to complete all corrective actions in the time allotted, a letter will be sent detailing areas of non-compliance along with sanctions that will be taken (including possible funding decrease) if the situation is not corrected. No RFCs will be paid on any of the project sponsor's contracts until all findings have been corrected. Waiver of the "no RFC" policy may be considered on a case-by-case bases.

## Responsibilities of the Subrecipient

Subrecipients who receive HOME-ARP assistance must understand it is their primary responsibility to enforce **ALL** obligations and regulations in complying with the intent of HUD notice CPD-21-10.

Subrecipients must ensure that activities undertaken meet the primary objectives of American Rescue Plan HOME program, its regulations, and the State's HOME-ARP program objectives.

If the State determines that a subrecipient of HOME-ARP funds has failed to comply with any provision of this subpart, the State shall notify the non-profits' chief executive officer of the noncompliance and shall request the officer to ensure conformity in a timely manner.

Remedial actions and sanctions for failure to meet the HOME-ARP program requirements will be designed to prevent a continuation of the deficiency; mitigate, to the extent possible, its adverse effects or consequences; and prevent its recurrence.

Mississippi Home Corporation may instruct the subrecipient to submit and comply with proposals for actions to correct, mitigate, and prevent noncompliance with HOME-ARP requirements including but not limited to the following:

- Prepare and follow a schedule of actions for carrying out activities affected by the noncompliance, including schedules, timetables, and milestones necessary to implement the affected activities;
- Establish and follow a management plan that assigns responsibilities for carrying out the remedial actions;
- Cancel or revise activities likely to be affected by the noncompliance, before expending HOME-ARP funds for the activities;
- Reprogram HOME-ARP funds that have not yet been expended from affected activities to other eligible activities;
- Suspend disbursement of HOME-ARP funds for some or all activities;
- Reduce or terminate the remaining grant of subrecipient and reallocate those funds to other subrecipients.

In addition, MHC may impose the following Remedial Plan of action for the noncompliance of subrecipients:

- The MHC may suspend payments to the extent HUD deems it necessary to preclude the further expenditure of funds for affected activities.
- The MHC may remove the subrecipient from participation in reallocations of funds.

- The MHC may require the subrecipient to reimburse its line of credit in an amount equal to the funds used for the affected areas.
- The MHC may reduce or terminate the remaining grant of a subrecipient and reallocate those funds to other recipients;
- The MHC may condition a future grant.
- The MHC may take other remedies that are legally available.

## **Performance Standards and Outcomes**

MHC consulted with each CoC to develop appropriate program outcomes and performance standards. HOME-ARP activities performance will be measured based on the CoC performance outcomes and the outcomes each subrecipients identified in their grant application.

Performance outcomes include:

1. Housing Measure
  - a. Permanent Housing- persons who remain in permanent housing and were were exited into permanent housing
  - b. Permanent Housing- persons who returned to homelessness within two-years of receiving assistance
2. Income Measure
  - a. Persons age 18 and older who increased their total income
  - b. Persons age 18 and older who increased their earned income

## **Common Errors on Request for Cash Submissions**

It is the responsibility of the State to ensure the activities of the HOME-ARP projects are administered in accordance with the HUD CPD Notice-10-2021. The subrecipient must ensure that project activities are carried out to avoid problems which violate the intent of the Notice. Although the duties may be delegated, the ultimate responsibility for compliance rests with the subrecipient's executive officers, as a State subrecipient of HOME-ARP funding.

Listed below are some common problems that subrecipients of HOME-ARP projects should be aware of and try to avoid:

### Environmental

- Contracts were executed prior to MHC environmental clearance apart from contracts for administrative services.
- Failure to provide MHC with necessary documentation.

## Financial Management

- Eligible Match funds not provided to match the RFC submitted.
- Representatives of the subrecipient agency were not adequately bonded; if applicable.
- Financial records were not maintained on a current basis or not kept in accordance with standards contained in the State or federal regulations.
- All receipts are not recorded in Cash Receipts Ledger.
- Bank reconciliation and subsidiary ledgers are not maintained, such as payments and balances.
- Unsupported or insufficient support for payments.
  - Missing copies of checks/credit card statement showing payment of purchases requested for reimbursement.
  - New rental agreements uploaded
  - Missing Activity sheets for staff costs.
- Expenditures made prior to the date of the contract or special conditions clearance.
- Inadequate procedures for verification of allowable costs.
- **Program modifications were implemented without prior MHC approval.** Any new activity not described in subrecipient's original budget or grant will require a modification.
- Inadequate separation of duties (i.e. person approving expenditures is also disbursing and recording; executive directors paid as case managers).

## Administration

Currently, Administration fees are not eligible expenses under HOME-ARP Supportive Services. Therefore, attending conferences, conventions, membership fees are not allowed.

- Appropriate timesheets, contact logs, and pay stubs not provided.
- Cost shared not appropriately divided across multiple grants.

## Procurement

- Solicitations for MBE/WBE participation were not obtained.
- The subrecipient fails to have written Procurement Procedures or fails to follow the procurement process.



## **Subrecipient Records/ Record Retention**

The subrecipient must provide a Record Retention policy. The subrecipient's review will follow the guide provided for accuracy and completeness.

## **File Organization and Maintenance**

A subrecipient should structure its project/case files and other records to comply with the general requirements to facilitate preparation of progress and other reports, including all submissions necessary for input into the Integrated Disbursement and Information System (IDIS). Subrecipients may use MHC's sample file template as a guide.

In setting up (or reviewing the adequacy of) its record-keeping system, a subrecipient should use this handbook to develop a list of all the items for which it must maintain documentation on a case/project basis and/or an activity basis, or MHC's HOME-ARP sample files.

The subrecipient must maintain records for the HOME-ARP programs for the greater of five (5) years or for the period specified below; however, COVID related programs like ARP must be kept for ten (10) years. Copies made by microfilming, photocopying, or similar methods may be substituted for the original records. This includes documentation of each program participants' qualification as a family or individual at risk of homelessness or as a homeless family or individual and other program participant which must be retained for five (5) years or ten years for COVID funding programs after the expenditure of all funds from the grant under which the program participant was served.

## **MHC Record Retention**

MHC shall retain records related to HOME-ARP, including supporting documentation, for a period of not less than five years to 10 years after the fiscal year of the grant or three years after the closeout of the grant from HUD, whichever is greater.

MHC will maintain files and records that relate to the overall administration of HOME-ARP as follows:

- Consolidated Plan submission to HUD
- Executed Grant Agreements
- Eligibility and national objective determinations for each activity under HOME-APR
- Citizen participation compliance documentation
- Fair Housing and Equal Opportunity records

### Access to records

The HUD Office of the Inspector General, the Comptroller General of the United States, Mississippi Home Corporation, or any of their authorized representatives, must have the right of access to all books, documents, papers, or other records of the sub-recipients that are pertinent to the HOME-ARP grant, to make audits, examinations, excerpts, and transcripts. These rights of access are not limited to the required retention period but last if the records are retained.

## **GENERAL COMPLIANCE**

Compliance with regulatory and programmatic requirements of the HOME-ARP subgrant is generally determined through a monitoring by MHC. Monitoring will be conducted and prioritized the risk assessment. Monitoring will generally be conducted after advance notice and at a date and time convenient to both MHC and subrecipients but may be conducted without notice and at any normal hour of business operation at the discretion of MHC.

### **Procurement Requirements & Disposition Requirements**

Procurement policy for programs administered by MHC is governed by Federal Regulation **2 CFR 200** and the policies are set forth in MHC Policy Statements and/or Instructions. The following procurement standards are currently in effect.

These policies and procedures are modified periodically in response to changing state laws or program conditions.

### Small Purchases

Nonprofessional services or supplies which do not involve an expenditure of more than \$5,000 may be purchased without advertising. This method of procurement lends itself best to simple, informal purchases in which written price quotations (at least two) are obtained from an adequate number of qualified sources. If the purchase of one item is at least \$1,000 but not more than \$5,000, then certain documentation is necessary. Documentation of procurement would include a description of supplies or services needed, a list of vendors or suppliers called, and price quotes obtained. Selection would be based on the lowest and best supplier.

If the aggregate cost is more than \$5,000, but not more than \$50,000, supplies or nonprofessional services may be obtained from the lowest and best bidder without advertising for bids, provided at least two (2) competitive written bids have been obtained. Documentation of procurement would include description of supplies or service needed, list of vendors or suppliers called or notified, and written individual quotes from each contacted vendor or supplier. Selection would be based on the lowest and best supplier.

Written procurement policy should be available for review and all contracts should be in writing. A disposition checklist must be completed for purchases made through the grant.

### Procurement History Records

Procurement history records must include the rationale for the method of procurement used, selection of contract type, contractor selection/rejection, and basis for contract price.

### **Fair Housing/ Equal Opportunity**

The guarantee of civil rights has a constitutional as well as a statutory base. Several laws overlap in their coverage of certain actions and activities.

The authority for complaint investigation and compliance determination is retained within HUD.

### Affirmative Marketing and Minority Outreach

The requirements in 24 CFR 92.351 apply to HOME-ARP activities.

### **Affirmative marketing**

Subrecipient must adopt and follow affirmative marketing procedures and requirements for HOME-ARP projects containing five or more HOME-assisted housing units. Affirmative marketing requirements and procedures also apply to all HOME-ARP funded programs, including, but not limited to, tenant-based rental assistance and supportive services programs. Affirmative marketing steps consist of actions to provide information and otherwise attract eligible persons in the housing market area to the available housing without regard to race, color, national origin, sex, religion, familial status, or disability. Currently MHC's HOME-ARP project DOES NOT have limitations or preferences.

However, if MHC implements limitations/preference through a written agreement with the project owner permits the rental housing project to limit tenant eligibility or to have a tenant preference in accordance with [§ 92.253\(d\)\(3\)](#), MHC will then require subrecipients to conduct affirmative marketing procedures and requirements that apply in the context of the limited/preferred tenant eligibility for the project.

When appropriate, the affirmative marketing requirements and procedures adopted must and will include:

- Methods for informing the public, owners, and potential tenants about Federal fair housing laws and the participating jurisdiction's affirmative marketing policy (e.g., the use of the Equal Housing Opportunity logotype or slogan in press releases and solicitations for owners, and written communication to fair housing and other groups);
- Requirements and practices each subrecipient and owner must adhere to in order to carry out the participating jurisdiction's affirmative marketing procedures and requirements (e.g., use of commercial media, use of community contacts, use of the Equal Housing Opportunity logotype or slogan, and display of fair housing poster);
- Procedures to be used by subrecipients and owners to inform and solicit applications from persons in the housing market area who are not likely to apply for the housing program or the housing without special outreach (e.g., through the use of community organizations, places of worship, employment centers, fair housing groups, or housing counseling agencies);

- Records that will be kept describing actions taken by the participating jurisdiction and by subrecipients and owners to affirmatively market the program and units and records to assess the results of these actions; and
- A description of how the participating jurisdiction will annually assess the success of affirmative marketing actions and what corrective actions will be taken where affirmative marketing requirements are not met.

### Minority outreach.

Subrecipients must establish minority outreach policy and procedures acceptable to MHC and HUD to ensure minority outreach program within its program for the inclusion, to the maximum extent possible, of minorities and women, and entities owned by minorities and women in order to facilitate the activities of HOME-ARP to provide affordable housing authorized under this Act or any other Federal housing law applicable to such jurisdiction. [Section 200.321](#) of [title 2 Code of Federal Regulations](#).

- Participation of Businesses owned by Minorities or Women

The subrecipient must also have a procedure to encourage and use minority/female businesses as a source of supplies, equipment, construction, and services.

### Nondiscrimination

Subgrantee is required to comply with all state and federal statutes relating to nondiscrimination, including the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, Title II of the Americans with Disabilities Act, and Title III of the American with Disabilities Act. Subgrantee may not take any of the following actions based on race, color, national origin, religion, gender, familial status, disability, marital status, source of income, sexual orientation, including gender identity, honorably discharged veterans/military status, and survivors of domestic violence:

- 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
- Deny anyone access to a facility or service.

### Civil Rights Requirements

All recipients of Mississippi HOME-ARP funds are required to comply with the Civil Rights requirements of Title I of the Housing and Community Development Act and the Fair Housing Laws including the following:

#### *Applicable Regulations*

*24 CFR Part I  
24 CFR Part 8 issued 6/2/88  
24 CFR Parts 105, 107, 108,  
109, 110, 115, 135  
41 CFR Chapter 60  
28 CFR Part 42  
24 CFR Part 576*

- Title VI, Civil Rights Act of 1964
- Housing and Community Development Act of 1974, as amended
- Title VIII, Civil Rights Act of 1968, as amended--or, the Fair Housing Act
- Housing and Urban Development Act of 1968
- Section 504, Rehabilitation Act of 1973, as amended
- Age Discrimination Act or 1975, as amended
- Executive Order 11063, as amended
- Executive Order 11246 as amended
- Executive Order 13279 as amended
- Section (3) Three, Housing and Urban Development Act of 1969, as amended

The Fair Housing and Equal Opportunity requirements affect every aspect of the Emergency Solutions Grant Program including the CARES component. Civil rights laws are designed to protect individuals from discrimination based on the following:

- Race
- Color-ethnicity
- Sex
- National Origin
- Age
- Handicap
- Families with children

As Civil Rights apply to all MHC funded programs, they protect individuals from discrimination in the following categories:

- Housing
- Benefits and services created by HOME-ARP projects
- Employment
- Business opportunities
- Relocation resulting from HOME-ARP funded activities

The following are individuals protected:

- Minorities
- Women
- Groups Distinguished by Age
- Handicapped Persons

The State, by certifying their compliance with applicable civil rights laws, assure that methods of administration at the state and local level will be adequate to meet the requirements of the civil rights

laws.

Subrecipient records for fair housing requirements compliance must adhere to 24 CFR Parts 1 and 107.

To document compliance with fair housing requirements, sub-recipient's records must include the following:

- Documentation of any sub-recipient actions to affirmatively further fair housing (including providing funds, if applicable, for each action).
- For direct benefit activities, data must be maintained on the extent of participation and benefit by individuals involved in a program or activity funded totally or partially with HOME-ARP funds. Such records must be kept by race, ethnicity, and gender of head of household, children, and handicap status. For area wide activities, documentation must include the following:
  - A description of geographic boundaries of the service area,
  - A description of the service being provided to the area, and
  - The race and ethnicity of the area
- Data on employment in each of the local government's operating units funded totally or partially with HOME-ARP funds. Data must be maintained for the categories prescribed in the Equal Employment Opportunity Commission's EEO-4 form.
- Data on persons in households displaced because of HOME-ARP activities, including the following:
  - The race and ethnicity of the households,
  - The handicap status of any displaced persons, and
  - The address to which each displaced household is relocated
- Where HOME-ARP activities cause a significant level of displacement of businesses, records must include data indicating the impact on businesses owned by minorities and women.

By signing the Certification of Assurance, the applicant is required to follow the bidding and negotiation requirements under Section 135.25 of the Section 3 Regulations (Title 24 CFR Part 135) and shall develop an affirmative action plan as specified in Section 135.70 for the use of businesses located in or owned in substantial part by persons residing in the area. Sub-recipients must document all efforts to meet these required actions and must report the progress made toward achieving these goals in the Contract and Subcontract Activity Report which is due every 6 months.

- Data must be submitted on each business entity that receives a contract or subcontract to be paid, with HOME-ARP funds, including data on the following:
  - The amount of the contract or subcontract
  - The racial/ethnic character
  - Any women's business enterprise as defined in Executive Order 12138.
- Documentation of the recipient's affirmative actions taken to overcome the effects of prior discrimination as determined through a formal compliance review or court proceeding, where the recipient has previously discriminated against persons on the ground of race, color, national origin, religion, sex, or handicap in administering a program or activity funded in whole or in part with HOME-ARP funds.
- Documentation indicating that the recipient has taken steps to affirmatively further fair housing.

### **Action to Affirmatively Further Fair Housing**

Under the HOME-ARP grant agreement, the subrecipient is required to provide assurance that the program will be conducted and administered in conformity with Title VIII of the Civil Rights Act of 1968. Therefore, all projects must be administered in a manner to affirmatively further fair housing. Sub-recipients must act to affirmatively further fair housing.

Examples of actions available to sub-recipients to fulfill this requirement include:

- Counseling Services
- Passage of a fair housing ordinance
- Creation of Human Rights Commission
- Education program
- Assistance to fair housing groups
- Assistance to minorities in locating in non-minority area
- Voluntary affirmative lending plans
- Voluntary affirmative realtor plans
- Voluntary affirmative home builder plans
- Local compliance and monitoring process
- Advertising the benefits of an open community
- Operation of a "New Horizons" program for providing fair housing
- Fair Housing Proclamation

The sub-recipient must indicate the type of action taken and the results of the efforts. For example, if a sub-recipient provides a counseling service to low and moderate-income persons, the sub-recipient must specify the type of counseling services provided and the number of beneficiaries by race and sex.

### Fair Housing and Equal Opportunity (FHEO) Posters and Displays

FHEO posters, English, and Spanish versions, must be posted in all grant sub-recipients administration buildings and shelter locations. These posters should be in a **public** place and located in **plain view** to

those entering and/or exiting the building in or near the common thoroughfare.

## **Fair Housing Amendments Act of 1988**

(P.L. 100-430)

The Fair Housing Amendments Act of 1988 provides stronger federal enforcement measures against discrimination in housing. It gives the Department of Housing and Urban Development authority to initiate enforcement actions and to penalize those who discriminate in the sale, rental, or financing of housing. In addition, the act adds persons with handicaps and families with children to those protected under Title VIII of the Civil Rights Act of 1968.

## **CIVIL RIGHTS REGULATIONS AND REQUIREMENTS APPLICABLE TO MISSISSIPPI'S EMERGENCY SOLUTIONS GRANT PROGRAM**

Communities funded under the HOME-ARP Program should familiarize themselves with the following civil rights regulations and/or requirements concerning Fair Housing and Equal Employment Opportunity. These issues include the handbook, "Mississippi Minority Business Directory." The purpose of the directory is to "enable program participants to assure that small and minority businesses are utilized, when possible, as sources of supplies, equipment, construction and services."

Included in the packet of civil rights regulations are the Fair Housing and Equal Employment Opportunity posters. Sub-recipients are to display these posters where they will be visible around their offices and on or near job sites. Also included are the following regulations and requirements which communities are urged to familiarize themselves with:

1. Title VI of the Civil Rights Act of 1964 (Pub. L. 88-352) and the regulations issued pursuant thereto (24 CFR Part 1) provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the applicant receives federal financial assistance and will immediately take any measures necessary to effectuate this assurance. If any real property or structure thereon is provided or improved with the aid of federal financial assistance extended to the applicant, this assurance shall obligate the applicant, or in the case of any transfer of such property, any transferee, for the period during which the real property or structure is used for a purpose for which the federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits.
2. Title VIII of the Civil Rights Act of 1968 (Pub. L. 90-284), as amended, administering all programs and activities relating to housing and community development in a manner to affirmatively further fair housing; and will act to affirmatively further fair housing in the sale or rental of housing, the financing of housing, and the provision of brokerage services.
3. Section 3 of the Housing and Urban Development Act of 1968, as amended (12 U.S.C. 1701u)



requiring that to the greatest extent feasible opportunities for training and employment be given to lower-income residents of the project area and contracts for work in connection with the project be awarded to eligible business concerns which are located in, or owned in substantial part by, persons residing in the area of the project.

4. Section 109 of the Housing and Community Development Act of 1974, as amended, which requires that no person in the United States shall on the ground of race, color, national origin or sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activities funded in whole or in part with federal funds made available pursuant to the Act. Section 109 further provides that any prohibition against discrimination based on age under the Age Discrimination Act of 1975 (42 U.S.C. 6101 et seq) or with respect to an otherwise qualified handicapped individual as provided in Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) shall also apply to any such program or activity.
5. Executive Order 11063, as amended by Executive Order 12259, on equal opportunity in housing and nondiscrimination in the sale or rental of housing built with federal assistance.
6. Executive Order 11246, and the regulations issued pursuant thereto (24 CFR Part 130 and 41 CFR Chapter 60), which provides that no person shall be discriminated against based on race, color, religion, sex or national origin in all phases of employment during the performance of federal or federally assisted construction contracts. Contractors and subcontractors on federal and federally assisted construction contracts shall take affirmative action to ensure fair treatment in the following categories:
  - employment
  - upgrading
  - demotion
  - transfer
  - recruitment or recruitment advertising
  - layoff or termination
  - rates of pay or other forms of compensation and
  - selection for training and apprenticeship

## **Violence Against Women Act (VAWA) protections**

### **§ 5.2005 VAWA protections.**

Subrecipients must provide **ALL** program participants with a notification of their VAWA rights. (See Appendix)

#### **(a) Notification of occupancy rights under VAWA, and certification form.**

(1) Subrecipients must provide to each of its applicants and to each of its tenants the notice of occupancy rights and the certification form as described in this section:

- (i) A “Notice of Occupancy Rights under the Violence Against Women Act,” as prescribed and in accordance with directions provided by HUD, that explains the VAWA protections under this subpart, including the right to confidentiality, and any

limitations on those protections; and

(ii) A certification form, in a form approved by HUD, to be completed by the victim to document an incident of domestic violence, dating violence, sexual assault or stalking, and that:

(A) States that the applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking;

(B) States that the incident of domestic violence, dating violence, sexual assault, or stalking that is the ground for protection under this subpart meets the applicable definition for such incident under § 5.2003; and

(C) Includes the name of the individual who committed the domestic violence, dating violence, sexual assault, or stalking, if the name is known and safe to provide.

(2) The notice required by paragraph (a)(1)(i) of this section and certification form required by paragraph (a)(1)(ii) of this section must be provided to an applicant or tenant no later than at each of the following times:

(i) At the time the applicant is denied assistance or admission under a covered housing program;

(ii) At the time the individual is provided assistance or admission under the covered housing program;

(iii) With any notification of eviction or notification of termination of assistance; and

(iv) During the 12-month period following December 16, 2016, either during the annual recertification or lease renewal process, whichever is applicable, or, if there will be no recertification or lease renewal for a tenant during the first year after the rule takes effect, through other means.

(3) The notice required by paragraph (a)(1)(i) of this section and the certification form required by paragraph (a)(1)(ii) of this section must be made available in multiple languages, consistent with guidance issued by HUD in accordance with Executive Order 13166 (Improving Access to Services for Persons with Limited English Proficiency, signed August 11, 2000, and published in the Federal Register on August 16, 2000 (at 65 FR 50121)).

**(b) Prohibited basis for denial or termination of assistance or eviction -**

(1) General. An applicant for assistance or tenant assisted under HOME-ARP programs may not be denied admission to, denied assistance under, terminated from participation in, or evicted from the housing on the basis or as a direct result of the fact that the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, if the applicant or tenant otherwise qualifies for admission, assistance, participation, or occupancy.

(2) Termination on the basis of criminal activity. An applicant in HOME-ARP housing programs must not be denied tenancy or occupancy rights solely on the basis of criminal activity directly relating to domestic violence, dating violence, sexual assault, or stalking if:

(i) The criminal activity is engaged in by a member of the household of the tenant or any guest or other person under the control of the tenant, and

(ii) The tenant or an affiliated individual of the tenant is the victim or threatened victim of such domestic violence, dating violence, sexual assault or stalking.

**(c) Construction of lease terms and terms of assistance. An incident of actual or threatened domestic violence, dating violence, sexual assault, or stalking shall not be**

**construed as:**

- (1) A serious or repeated violation of a lease executed under a covered housing program by the victim or threatened victim of such incident; or
- (2) Good cause for terminating the assistance, tenancy, or occupancy rights under a covered housing program of the victim or threatened victim of such incident.

**(d) Limitations of VAWA protections.**

- (1) Nothing in this section limits the authority of an HOME-ARP subrecipient, when notified of a court order, to comply with a court order with respect to:
  - (i) The rights of access or control of property, including civil protection orders issued to protect a victim of domestic violence, dating violence, sexual assault, or stalking; or
  - (ii) The distribution or possession of property among members of a household.
- (2) Nothing in this section limits any available authority of a covered housing provider to evict or terminate assistance to a tenant for any violation not premised on an act of domestic violence, dating violence, sexual assault, or stalking that is in question against the tenant or an affiliated individual of the tenant. However, the covered housing provider must not subject the tenant, who is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, or is affiliated with an individual who is or has been a victim of domestic violence, dating violence, sexual assault or stalking, to a more demanding standard than other tenants in determining whether to evict or terminate assistance.
- (3) Nothing in this section limits the authority of a covered housing provider to terminate assistance to or evict a tenant under a covered housing program if the covered housing provider can demonstrate an actual and imminent threat to other tenants or those employed at or providing service to property of the covered housing provider would be present if that tenant or lawful occupant is not evicted or terminated from assistance. In this context, words, gestures, actions, or other indicators will be considered an “actual and imminent threat” if they meet the standards provided in the definition of “actual and imminent threat” in § 5.2003.
- (4) Any eviction or termination of assistance, as provided in paragraph (d)(3) of this section should be utilized by a covered housing provider only when there are no other actions that could be taken to reduce or eliminate the threat, including, but not limited to, transferring the victim to a different unit, barring the perpetrator from the property, contacting law enforcement to increase police presence or develop other plans to keep the property safe, or seeking other legal remedies to prevent the perpetrator from acting on a threat. Restrictions predicated on public safety cannot be based on stereotypes, but must be tailored to particularized concerns about individual residents.

**(e) Emergency transfer plan.** Each subrecipient, as identified in the program-specific regulations for the covered housing program, shall adopt an emergency transfer plan, no later than June 14, 2017 based on HUD's model emergency transfer plan, in accordance with the following:

- (1) For purposes of this section, the following definitions apply:
  - (i) Internal emergency transfer refers to an emergency relocation of a tenant to another unit where the tenant would not be categorized as a new applicant; that is, the tenant may reside in the new unit without having to undergo an application process.
  - (ii) External emergency transfer refers to an emergency relocation of a tenant to another unit where the tenant would be categorized as a new applicant; that is the tenant must undergo an application process in order to reside in the new unit.
  - (iii) Safe unit refers to a unit that the victim of domestic violence, dating violence, sexual

assault, or stalking believes is safe.

(2) The emergency transfer plan must provide that a tenant receiving rental assistance through, or residing in a unit subsidized under, a covered housing program who is a victim of domestic violence, dating violence, sexual assault, or stalking qualifies for an emergency transfer if:

(i) The tenant expressly requests the transfer; and

(ii)

(A) The tenant reasonably believes there is a threat of imminent harm from further violence if the tenant remains within the same dwelling unit that the tenant is currently occupying; or

(B) In the case of a tenant who is a victim of sexual assault, either the tenant reasonably believes there is a threat of imminent harm from further violence if the tenant remains within the same dwelling unit that the tenant is currently occupying, or the sexual assault occurred on the premises during the 90-calendar-day period preceding the date of the request for transfer.

(3) The emergency transfer plan must detail the measure of any priority given to tenants who qualify for an emergency transfer under VAWA in relation to other categories of tenants seeking transfers and individuals seeking placement on waiting lists.

(4) The emergency transfer plan must incorporate strict confidentiality measures to ensure that the covered housing provider does not disclose the location of the dwelling unit of the tenant to a person who committed or threatened to commit an act of domestic violence, dating violence, sexual assault, or stalking against the tenant.

(5) The emergency transfer plan must allow a tenant to make an internal emergency transfer under VAWA when a safe unit is immediately available.

(6) The emergency transfer plan must describe policies for assisting a tenant in making an internal emergency transfer under VAWA when a safe unit is not immediately available, and these policies must ensure that requests for internal emergency transfers under VAWA receive, at a minimum, any applicable additional priority that housing providers may already provide to other types of emergency transfer requests.

(7) The emergency transfer plan must describe reasonable efforts the covered housing provider will take to assist a tenant who wishes to make an external emergency transfer when a safe unit is not immediately available. The plan must include policies for assisting a tenant who is seeking an external emergency transfer under VAWA out of the covered housing provider's program or project, and a tenant who is seeking an external emergency transfer under VAWA into the covered housing provider's program or project. These policies may include:

(i) Arrangements, including memoranda of understanding, with other covered housing providers to facilitate moves; and

(ii) Outreach activities to organizations that assist or provide resources to victims of domestic violence, dating violence, sexual assault, or stalking.

(8) Nothing may preclude a tenant from seeking an internal emergency transfer and an external emergency transfer concurrently if a safe unit is not immediately available.

(9) Where applicable, the emergency transfer plan must describe policies for a tenant who has tenant-based rental assistance and who meets the requirements of paragraph (e)(2) of this section to move quickly with that assistance.

(10) The emergency transfer plan may require documentation from a tenant seeking an

emergency transfer, provided that:

- (i) The tenant's submission of a written request to the covered housing provider, where the tenant certifies that they meet the criteria in paragraph (e)(2)(ii) of this section, shall be sufficient documentation of the requirements in paragraph (e)(2) of this section;
  - (ii) The covered housing provider may, at its discretion, ask an individual seeking an emergency transfer to document the occurrence of domestic violence, dating violence, sexual assault, or stalking, in accordance with § 5.2007, for which the individual is seeking the emergency transfer, if the individual has not already provided documentation of that occurrence; and
  - (iii) No other documentation is required to qualify the tenant for an emergency transfer.
- (11) The covered housing provider must make its emergency transfer plan available upon request and, when feasible, must make its plan publicly available.
- (12) The covered housing provider must keep a record of all emergency transfers requested under its emergency transfer plan, and the outcomes of such requests, and retain these records for a period of three years, or for a period of time as specified in program regulations. Requests and outcomes of such requests must be reported to HUD annually.
- (13) Nothing in this paragraph (e) may be construed to supersede any eligibility or other occupancy requirements that may apply under a covered housing program.

### **HUD Section 3**

The U.S. Department of Housing and Urban Development (HUD) invests billions of federal dollars into distressed communities for urban planning, community development and projects that build and rehabilitate housing to help families achieve the American Dream. Section 3 of the Housing and Urban Development Act of 1968 recognizes that federal financial assistance can also become a tool to expand economic opportunities for low- and very low-income families and businesses of the neighborhoods and communities where HUD invests public resources.

As a recipient of federal funds, MHC shall comply with Section 3 requirements set forth at 24 CFR Part 135 of the federal regulation which states that, to the greatest extent possible, businesses and employers working on HUD-funded projects must make a good faith effort to train and employ low-income individuals (Section 3 residents) living in the local area and also to contract with businesses owned by or that employ Section 3 residents. The regulatory threshold of Section 3 applicability to HUD-assisted projects is \$200,000 for Sub-Recipients and \$100,000 for Contractors and Sub-Contractors.

MHC has determined that all projects, regardless of the dollar amount, will be subject to compliance with Section 3 Requirements. This means that all sub-recipients, contractors, and/or subcontractors of MHC funded HUD projects will be obligated to comply with Section 3 requirements as set forth at 24 CFR 135 and MHC Section 3 Policy and Procedures. MHC believes that eliminating the regulatory threshold for Section 3 compliance will allow more residents of low- income communities generally – and more people who live in assisted housing in particular – to build work histories and obtain the work experience and skills they need to succeed in the labor market.

Therefore, strengthening Section 3 will make job training available to those who need it most and create a path of economic opportunity for Mississippians struggling with unemployment and low incomes.

## Audits

The Federal Office of Management and Budget (OMB) Circular No. 2 CFR 200 requires that a state, local government or non-profit organization expending \$750,000 or more a year in total cumulative Federal funds must have a Single Audit made in accordance with the Single Audit Act. This audit report must be submitted and received by the Federal clearinghouse designated by OMB and the Federal awarding agency or pass-through entity, **no later than nine months following the end of the grant recipient's fiscal year in which the Federal funds were expended. If the financial audit was started but not completed within nine months of the subrecipient fiscal year, MHC may extend their audit submission time on a case-by-case bases.**

If a Single Audit is required, and any of the funds expended were received through MHC requires that a copy of the Single Audit report must be submitted and received by the HOME-ARP staff **no later than nine months following the end of the grant recipient's fiscal year in which the Federal funds were expended. If the financial audit was started but not completed within nine months of the subrecipient fiscal year, MHC may extend their audit submission time on a case-by-case basis.**

If a Single Audit **is not** required, (and any of the funds expended were received through MHC), MHC requires that an acceptable IRS 90 Form (for that year only) be submitted and received by the HOME-ARP staff. It must be received **no later than nine months following the end of the grant recipient's fiscal year/calendar in which the Federal funds were expended**, but no sooner than the end of the same fiscal year/calendar year.

The Single Audit and 990 does not exclude the grant recipient from any other requirements of audits or financial statements as requested by MHC or any other Agency or Authority.

Audits should be mailed or emailed to:

[Tmara.stewart@mshc.com](mailto:Tmara.stewart@mshc.com)

[Fredrick.davis@mshc.com](mailto:Fredrick.davis@mshc.com)

Mississippi Home Corporation  
HOME-ARP Department  
735 Riverside Drive  
Jackson, MS 39202

**APPENDIX**

## HOME-ARP Allowable Program Activities Chart

<b>Supportive Services</b>	<b>TBRA</b>
Child care	Security deposit
Education Services (contract or staff)	Utility deposit
Employment assistance and job training (contract or staff)	Rent
Food	Admin
Housing Search and Counseling Services (staff)	Indirect Cost
Legal services	
Life skills	
Mental health Services (outpatient)	
Outpatient health services	
Substance abuse treatment (outpatient and no detox)	
Transportation	
Case management (staff)	
Mediation	
Credit repair -classes only (cannot pay a creditor)	
Landlord/Tenant liaison (staff)	
Services for Special populations	
<b>Financial assistance:</b>	
<ul style="list-style-type: none"> <li>• Rental application fee</li> <li>• Security deposits</li> <li>• Utility deposits</li> <li>• Utility payments</li> <li>• Moving cost</li> <li>• First and last month's rent</li> <li>• Rental arrears</li> </ul>	
Short-term to Medium term Rental assistance <ul style="list-style-type: none"> <li>• Up to 6 months</li> </ul>	
<b>Counseling services</b>	
Indirect Cost	



**Staff Activity Report Sample**

**EXAMPLE: MONTHLY TIME ACTIVITY REPORT FOR PROJECT STAFF**

Agency: \_\_\_\_\_

Month: May				Name
DATE	TIME IN	TIME OUT	TOTAL HOURS	PRINCIPAL ACTIVITIES
5/1/18	7:00am	3:30pm	8	Assist with Crisis Calls, case management, grant reimbursements, payables
5/2/18	7:00am	3:30pm	8	Assist with Crisis Calls, case management, grant reimbursements, review resumes
5/3/18	7:00am	3:30pm	8	Assist with Crisis Calls, case management, grant reimbursements, match documentation
5/4/18	7:00am	3:30pm	8	Assist with Crisis Calls, case management, grant reimbursements
5/7/18	7:00am	3:30pm	8	Payroll Assist with Crisis Calls, case management, Grant reimbursement
5/8/18	7:00am	3:30pm	8	Assist with Crisis Calls, case management, review resumes
5/9/18	7:00am	3:30pm	8	Answer calls during Treatment Team Meeting, case management, work with Accountant
5/10/18	7:00am	3:30pm	8	Assist with Crisis Calls, case management, payables
5/11/18	7:00am	3:30pm	8	Assist with Crisis Calls, case management, donation documentation
5/14/18	7:00am	3:30pm	8	case management, financials, DAIP & 2nd Chance Reconciliation
5/15/18	7:00am	3:30pm	8	Assist with Crisis Calls, Board Meeting Prep
5/16/18	7:00am	3:30pm	8	Assist with Crisis Calls, case management, match documents
5/17/18	7:00am	3:30pm	8	Assist with Crisis Calls, case management, donations
5/18/18	7:00am	3:30pm	8	Assist with Crisis Calls, case management, payables
5/21/18	7:00am	3:30pm	8	Payroll Assist with Crisis Calls, case management, interviews
5/22/18	7:00am	3:30pm	8	Assist with Crisis Calls, case management, grant reimbursements
5/23/18	7:00am	3:30pm	8	Answer calls during Treatment Team Meeting, case management, grant reimbursements
5/24/18	7:00am	3:30pm	8	Assist with Crisis Calls, case management, financial reconciliation
5/25/18	7:00am	3:30pm	8	Assist with Crisis Calls, case management, budgets
5/28/18	7:00am	3:30pm	8	Holiday
5/29/18	7:00am	3:30pm	8	Assist with Crisis Calls, case management, purchasing
5/30/18	7:00am	3:30pm	8	Assist with Crisis Calls, case management, review resumes
5/31/18	7:00am	3:30pm	8	Assist with Crisis Calls, case management, grant reimbursements, payables

EMPLOYEE SIGNATURE: \_\_\_\_\_ DATE: \_\_\_\_\_

EXECUTIVE DIRECTOR SIGNATURE: \_\_\_\_\_ DATE: \_\_\_\_\_

# Timesheet

Printed on: 08/09/2018

Jun 17 to Jun 23, 2018

Name:

Customer:Job	Service Item	Notes	Class	Su	M	Tu	W	Th	F	Sa	Total	Bill*
ESG 2018	Case Conferencing	10432, 10440, 10376, 10139				2:45	2:45	2:30			2:45	N
ESG 2018	Case Conferencing	10460, 10455, 10432, 10392, 10376			2:00		2:45	2:30			7:15	N
ESG 2018	Case Management Activity	10152, 10375, 10363						1:00			1:00	N
ESG 2018	Data Entry and Program Support	10335, 10152, 10194,			2:15			3:30			2:15	N
ESG 2018	File Processing, non client							3:30			3:30	N
ESG 2018	Intake	10432, 10440, 10460				1:00	0:45	1:30			3:15	N
ESG 2018	Program reporting	staff meeting			1:00			1:30			1:00	N
ESG 2018	Rental Counseling	10152, 10375, 10363			1:15	1:30		0:30			3:15	N
ESG 2018	Staff Training	Training			2:30	2:15	5:30				10:15	N
ESG 2018	Activities											
ESG 2018	Staff Training					1:30					1:30	N
ESG 2018	Activities											
Totals				0:00	9:00	9:00	9:00	9:00	0:00	0:00	36:00	

Signature \_\_\_\_\_

## Recordkeeping Checklist

The State requires that a recordkeeping system be maintained by all HOME-ARP subrecipients receiving funds administered by MHC. The system must be at least the equivalent of the files as listed below. **Failure to maintain an adequate system as determined by MHC staff could result in a finding. Records must be maintained for a period of five (5) years to ten (10) after the project closes out.**

The following file system checklist has been established to help maintain your records:

Project Name

Project Number

### **APPLICATION FILE**

\_\_\_\_\_ Full application as submitted to State

\_\_\_\_\_ Additional information submitted

### **CONTRACT FILE**

\_\_\_\_\_ Award letter

\_\_\_\_\_ Executed contract

\_\_\_\_\_ Correspondence concerning contract conditions

\_\_\_\_\_ Contract modifications and letters of approval

### **GENERAL CORRESPONDENCE**

\_\_\_\_\_ General correspondence

\_\_\_\_\_ State general correspondence/memorandums

### **HOME-ARP REPORT**

\_\_\_\_\_ Confidentiality Procedures

\_\_\_\_\_ Monthly Statistical Reports

\_\_\_\_\_ Quarterly Program Reports

**STATE MONITORING FILE**

\_\_\_\_\_ State reports of results of monitoring reviews/ recommendations

\_\_\_\_\_ Subrecipient's response to State monitoring reports

\_\_\_\_\_ Other correspondence related to State monitoring

**ENVIRONMENTAL REVIEW RECORD FILE**

\_\_\_\_\_ Copy of "Environmental Review Record" as submitted to MHC

\_\_\_\_\_ Notice of "Removal of Contract Conditions and Release of Funds"

\_\_\_\_\_ Letter of Clearance from the Department of Archives and History  
(only for renovations)

\_\_\_\_\_ Finding of Exemption

**FINANCIAL MANAGEMENT FILE**

\_\_\_\_\_ "Authorized Signature Letter"

\_\_\_\_\_ "Requests for Cash", Support Sheets, and Documentation

\_\_\_\_\_ General ledger and disbursements journal (Example included in Exhibits)

\_\_\_\_\_ Invoices, pay estimates, receipts of payments of program costs

\_\_\_\_\_ Subcontracts if applicable

\_\_\_\_\_ Timesheets and staff records

\_\_\_\_\_ Vendor Information

**PROCUREMENT FILE (if applicable)**

\_\_\_\_\_ Proof of Publication of Requests for proposals/bids

\_\_\_\_\_ Written Selection Procedures

- \_\_\_\_\_ Proof of Solicitations for proposals/bids
- \_\_\_\_\_ Proposals/bids received
- \_\_\_\_\_ Evaluations of proposals/bids received
- \_\_\_\_\_ Written statements of acceptance of proposals/bids
- \_\_\_\_\_ Executed contracts for each service required; NOTE: All contracts must contain the provisions listed in 24 CFR Part 85 or 24 CFR Part 84, whichever applies.
- \_\_\_\_\_ Copies of written notification of procurement Requests for Proposals to the Mississippi Contract Procurement Center

**EQUAL OPPORTUNITY/FAIR HOUSING FILE/VAWA REQUIREMENTS**

- \_\_\_\_\_ Documentation of total number of female heads of households, minorities, handicapped, elderly and children who are beneficiaries
- \_\_\_\_\_ Documentation of affirmatively promoting fair housing or of making known availability of services
- \_\_\_\_\_ Employment information of the administrative agency
- \_\_\_\_\_ Community population (if applicable)
- \_\_\_\_\_ Contractor/Subcontractor Activity Reports (if applicable)
- \_\_\_\_\_ Documentation of attempts to solicit minority/female businesses
- \_\_\_\_\_ Documentation of compliance with VAWA regulations

**AUDITS**

- \_\_\_\_\_ Audit for each year included in grant period
- \_\_\_\_\_ Evidence clearing all audit exceptions

**AUDIT REQUIREMENTS OF MISSISSIPPI HOME CORPORATION  
Funding Certification Form**

**Organization:** \_\_\_\_\_ **Fiscal Year End:** \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_  
Month Day Year

- We **have exceeded** the federal expenditure threshold of \$750,000. We will have our Single Audit or Program Specific Audit completed and will submit by \_\_\_\_\_, which is no later than nine (9) months after the end of the audited fiscal year.
- We **have exceeded** the federal expenditure threshold of \$750,000 but **did not receive** any of these funds from Mississippi Home Corporation.
- We **did not exceed** the \$750,000 federal expenditure threshold required for a Single Audit or a Program Specific Audit to be performed this fiscal year. **(Fill out schedule below)**

**Must be filled out if Single Audit or Program Audit is not required:**

Federal Funds				
<u>Federal Grantor</u>	<u>Pass-through Grantor</u>	<u>Program Name &amp; CFDA Number</u>	<u>Contract Number</u>	<u>Expenditures</u>
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
<b>Total Federal Expenditures for this Fiscal Year</b>				<b>\$</b> _____

Authorized Signature ( <i>Executive Director, Mayor, Board President</i> )	Printed Name	Title
Mailing Address:	City, State	Zip Code
Email Address:	Phone Number	Fax Number
Chief Financial Officer / Comptroller	Phone Number	Fax Number

Failure to submit this completed form or a completed Single Audit package as described in the audit requirements by the required due date will affect eligibility for future funding.

**Submit this form to:**  
 Mississippi Home Corporation  
 HOME-ARP Department  
 735 Riverside Drive  
 Jackson, Mississippi 39202

**HOME-ARP**  
Homelessness Prevention and Rapid Re-Housing Program Application

**To be completed by case manager only:**

Organization:	
Case Manager:	Phone Number:

Name:			
Address:			
Phone Number:		County:	
SSN:	DOB:	Race:	
Age:	Sex:	Marital:	

Why is participant requesting HOME-ARP assistance? What Qualifying Population is the applicant eligible as. **Be specific and provide documentation eligibility under one of the 4 QPs:**

Household Size: Number of Bedrooms:  
List all household members:

<u>Name</u>	<u>SS (last 4 digits)</u>	<u>Age</u>	<u>Relationship</u>
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

\*Copy of the full social security number should be maintained in participants' file.

**Does participant report any other source of income?**  Yes  No  
If yes, list all sources and amount of income (SS, SSI, unemployment, child support, etc.):

**Is participant currently employed?**  Yes  No  
*If no, please provide unemployment documentation.*

**Does participant have any of the following assets?**  Yes  No  
 Checking  Savings  IRAs  CDs  Interest/Dividends from checking/savings  
If yes to any resources listed above, verification **must** be provided.  
Provide estimated value of each asset. \$ \_\_\_\_\_  
Provide participant's average household monthly income amount. \$ \_\_\_\_\_  
Provide participant's average household monthly expenses (rent & utilities). \$ \_\_\_\_\_

**Has participant attempted to identify other resources to secure housing assistance?**  Yes  No  
If yes, provide names of agency(s):  
  
Type of assistance:  
Amount of assistance received: \$ \_\_\_\_\_  
*If assistance from any source is being received for the activities being requested, the participant is not eligible..*

**Is a signed lease agreement in participants' name provided?**  Yes  No  
**Is participants' rent subsidized?**  Yes  No  
*If yes, then participant is may not eligible for HOME-ARP rental assistance.*  
**If participant is responsible for utilities, are they in the participants' name?**  Yes  No  
*If no, participant is **not** eligible for utility assistance.*

I understand that any assistance received is temporary and I will continue to be responsible for maintaining my living expenses. Also, I agree not to sublease the rental unit as long as HOME-ARP assistance is received.

**I certify that the information I have provided is true and correct to the best of my knowledge. Title 18, Section 1001 of the U.S. Code states that a person is guilty of a felony for knowingly and willingly making false or fraudulent statements to any department of the United States Government.**

**Participant Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_





NOTICE OF OCCUPANCY RIGHTS UNDER  
THE VIOLENCE AGAINST WOMEN ACT

**[Insert Name of Housing Provider<sup>1</sup>]**

**Notice of Occupancy Rights under the Violence Against Women Act<sup>2</sup>**

**To all Tenants and Applicants**

The Violence Against Women Act (VAWA) provides protections for victims of domestic violence, dating violence, sexual assault, or stalking. VAWA protections are not only available to women, but are available equally to all individuals regardless of sex, gender identity, or sexual orientation.<sup>3</sup> The U.S. Department of Housing and Urban Development (HUD) is the Federal agency that oversees that **[insert name of program or rental assistance]** is in compliance with VAWA. This notice explains your rights under VAWA. A HUD-approved certification form is attached to this notice. You can fill out this form to show that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking, and that you wish to use your rights under VAWA.”

**Protections for Applicants**

If you otherwise qualify for assistance under **[insert name of program or rental assistance]**, you cannot be denied admission or denied assistance because you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

**Protections for Tenants**

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<sup>1</sup> The notice uses HP for housing provider but the housing provider should insert its name where HP is used. HUD’s program-specific regulations identify the individual or entity responsible for providing the notice of occupancy rights.

<sup>2</sup> Despite the name of this law, VAWA protection is available regardless of sex, gender identity, or sexual orientation.

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



MISSISSIPPI HOME CORPORATION

## Client Services Documentation Checklist

- \_\_\_\_\_ 1. HOME-ARP: Assistance Checklist
- \_\_\_\_\_ 2. Application
- \_\_\_\_\_ 3. “But-For” Criteria (Narrative for QP 2 and QP4)
- \_\_\_\_\_ 4. Income Verification (QP 2 and QP4)
- \_\_\_\_\_ 5. Asset Verification (if available)
- \_\_\_\_\_ 6. Lease Agreement
- \_\_\_\_\_ 7. Eviction Notice (QP 2 and QP 4 (2) )
- \_\_\_\_\_ 8. Affidavit of Arrears (QP 2 and QP 4 (2) )
- \_\_\_\_\_ 9. Rental Payment Ledger (QP 2 and QP 4 (2) )
- \_\_\_\_\_ 10.FMR
- \_\_\_\_\_ 11.Rent Reasonableness Checklist
- \_\_\_\_\_ 12.Habitability Standards Checklist/NSPIRE
- \_\_\_\_\_ 13.Lead-Based Paint Checklist
- \_\_\_\_\_ 14.Termination of Assistance Agreement
- \_\_\_\_\_ 15. Homeless Verification (QP1)
- \_\_\_\_\_ 16. Documentation to support “At Risk of Homelessness” (QP 2 and QP 4 (2) )
- \_\_\_\_\_ 17.Cancelled Checks (front and back)



MISSISSIPPI HOME CORPORATION

## Staff and Overhead Cost Documentation Checklist

Employee compensation and overhead cost directly related to carrying out activities eligible under a HOME-ARP component are eligible **cost under that component**.

- \_\_\_\_\_ 1. Job Description for staff charged to the grant (submit once)
- \_\_\_\_\_ 2. Timesheets (signed and charged to appropriate component)
- \_\_\_\_\_ 3. Staff Activity Logs (activities lineup with HOME-ARP activities)
- \_\_\_\_\_ 4. Staff Time breakdown across multiple grants (if appropriate)
- \_\_\_\_\_ 5. Pay stubs
- \_\_\_\_\_ 6. Fringe benefits documentation
- \_\_\_\_\_ 7. Invoices for work related staff supplies
- \_\_\_\_\_ 8. Lease Agreement for office (submit once)
- \_\_\_\_\_ 9. Approved Indirect Costs Rate (submit once)
- \_\_\_\_\_ 10. Milage form (signed) and verification of payment