

City of Evansville Department of Metropolitan Development (DMD)

EMERGENCY SOLUTIONS GRANT

AWARD MANUAL Part II 2024

Homeless Prevention* Rapid Re-Housing

Issued July 17, 2017

*We currently don't have a homeless prevention program in 2024.

TABLE OF CONTENTS:

REQUIRED FORMS

SECTION I: PROGRAM OVERVIEW AND OBJECTIVES

SECTION II: PROGRAM REQUIREMENTS

- Eligibility intake Criteria
- Written Policies and Procedures
- Keeping Accurate Financial and Service Delivery Records
- Coordination with other targeted homeless services
- System and program coordination
- Arizona Matrix Tool
- Coordinated Entry
- Habitability
- Ensuring Confidentiality
- Rent Reasonableness
- Fair Market Rent
- Tenant Rent Calculation
- Utility Payments
- Re-Evaluations
- Case Management
- Housing Plans
- File Documentation Requirements
- Termination and Appeal
- Participation of People with Lived Experiences of Homelessness
- Regional Planning Council Participation

SECTION III: ELIGIBILITY CRITERIA

- Rapid Re-housing Eligibility
- Rapid Re-housing Documentation
- Homeless Prevention Eligibility
- Homeless Prevention Documentation

SECTION IV: HOUSING RELOCATION & SERVICES

- Financial Assistance
- Service Costs: Housing Search, Case Management
- Maximum Amounts of assistance
- Use of Other Subsidies

SECTION V: RENTAL ASSISTANCE

- Provisions
- Agreements & Leases

SECTION VI REPORTS & HMIS

- Reports
- Homeless Management Information System (HMIS)
- Point in Time Count

SECTION VII AWARD MONITORING

SECTION VIII: LEAD BASED PAINT REQUIREMENTS

SECTION IX: COORDINATED ENTRY

SECTION X: FINANCIAL MANAGEMENT

- Match
- Budget Modifications
- Claims
- OMB Audit & Financial Statements

SECTION XI: CONFLICTS OF INTEREST

SECTION XII: OTHER FEDERAL & STATE REQUIREMENTS

Nondiscrimination

Affirmative Fair Housing

Lobbying

Violence Against Women Reauthorization Act of 2013 (VAWA)

SECTION XIII: PROCUREMENT

SECTION XIV: STANDARDS OF CARE

SECTION XV: REFERENCE RESOURCES

REQUIRED FORMS:

- ESG Client File Checklist Form (highly recommended)
- Homeless or At Risk of Homeless Documentation Form
- Coordinated/ Centralized Assessment
- HUD Income Checklist (for Homeless Prevention)
- Arizona Matrix Tool – embedded in HMIS
- Housing Plan-embedded in HMIS as a template under “case notes”
- Income Verification forms – as reference
- Zero Income Affidavit (if participant has no income)
- Income /Rent/ Utilities Calculation Form
- Initial Request for Unit Approval
- Housing Habitability Standards Form
- Lead Disclosure Form (If pregnant women and/or children under 6 will be living in a building built before 1978)
- Rental Assistance Payment Contract (RAP) between Subrecipient and Tenant
- Rental Assistance Payment Contract (RAP) between Subrecipient and Landlord
- Rent Reasonableness Certification from GoSection8 software
- Signed copy of Participant’s lease
- Termination & Appeal Policy & Procedure (recommend having client sign form that they’ve received a copy of it)

SECTION I PROGRAM OVERVIEW AND OBJECTIVES

EMERGENCY SOLUTIONS GRANT OVERVIEW AND PROGRAM OBJECTIVES

Emergency Solutions Grant (ESG) funds are administered locally by the City of Evansville Department of Metropolitan Development (DMD)

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH), enacted into law on May 20, 2009, consolidated three of the separate Homeless assistance programs administered by HUD under the McKinney-Vento Homeless Assistance Act into a single grant program, and revised the Emergency Shelter Grant program and renamed it as the Emergency Solutions Grant (ESG). The new ESG grant focuses on assisting people quickly to regain stability in permanent housing after experiencing a housing crisis and/or Homelessness.

DMD officially collaborates with the Continuum of Care (CoC) for their region. The City of Evansville is part of the Indiana Balance of State CoC. The Indiana Planning Council on the Homeless is the governing body for the Indiana Balance of State CoC. On February 12, 2012 the City of Evansville made it official.

The Indiana Balance of State CoC is divided into regions, and the City of Evansville is part of Region 12. The Homeless Services Council of Southwest Indiana (HSC) serves officially as the Region 12 Planning Council. On December 14, 2012, the Region 12 Region Planning Council Charter was adopted. The following performance goals were adopted:

1. Decrease shelter stays by increasing rapid re-housing to stable housing.
2. Reduce recidivism of households experiencing homelessness.
3. Decrease the number of Veterans experiencing homelessness.
4. Decrease the number of persons experiencing Chronic Homelessness.
5. Decrease the number of households with children.
6. Increase the percentage of participants in CoC funded projects that are employed at exit to 38 percent or higher.
7. Increase persons experiencing homelessness's access to mainstream resources.
8. Collaborate with local education agencies to assist in the identification of homeless families and inform them of their eligibility for McKinney-Vento education services.
9. Improve homeless outreach and triage to housing and services.
10. Improve HMIS data quality and coverage, and use data to develop strategies and polices to end homelessness.
11. Develop effective discharge plans and programs for individual leaving State Operated Facilities at risk of homelessness.

Some Highlights of Requirements and Priorities for City of Evansville ESG funds:

- The new ESG places an emphasis on communities working together as a system with coordinated entry.
- ESG subrecipients are expected to participate in coordinated entry with other ESG subrecipients within the homeless system.
- ESG subrecipients are expected to allow referrals using a common assessment in coordinated access.
- ESG subrecipients are expected to work with other ESG subrecipients on community solutions to ending Homelessness and triage for clients that fall in-between gaps.
- ESG subrecipients are expected to attend at least 75% of Homeless Services Council of Southwest Indiana monthly meetings.
- ESG subrecipients are expected to coordinate ESG funds between the DMD and Indiana Housing Community Development Authority (IHCDA) if receiving ESG funds from both sources.

- ESG subrecipients are expected to keep data up to date in HMIS at least on a monthly basis.
- ESG subrecipients are expected to allow a Regional Data Administrator to gather aggregate data from HMIS (keeping personal information confidential).
- A fairly new HUD rule, Equal Access to Housing, does not allow discrimination against couples including unmarried, and the lesbian, gay, bisexual, or transgender (LGBT) community.
- HUD does not allow discrimination against children based on age and gender.
- Monitoring of ESG subrecipients will be done through the Standards of Care committee process.
- HUD will not allow new transitional housing applications, only those that previously received ESG funds for transitional housing are allowed to apply for ESG funds.
- Couples have been identified as a gap in our local current Homeless system. Most couples are split apart based on gender, but there are times when a couple needs to stay together due to disabilities or other pressing priorities.

In addition, all City of Evansville ESG subrecipients are expected to adhere to this manual.

ESG Components & Eligible Activities

1. Street Outreach
 - A. Available to serve unsheltered homeless persons
 - B. Can be used for essential services that include:
 1. Engagement
 2. Case Management
 3. Emergency health and mental health services
 4. Transportation
 5. Services for special populations
2. Emergency Shelter
 - A. Available to serve homeless persons staying in emergency shelters
 - B. Can be used for essential services that include:
 1. Case Management
 2. Child Care, Education, Employment, Life Skills & Legal Services
 3. Outpatient health Services, Mental Health Services, Substance Abuse Treatment
 4. Transportation
 5. Services for special populations
 - C. Can be used for the operations of a shelter
 1. Utilities
 2. Food
3. Homelessness Prevention
 - A. Available to serve persons below 30% AMI at immediate risk of becoming Homeless
 - B. Uses:
 1. Prevent an individual or family from becoming Homeless (diversion).
 2. To help an individual or family renting regain stability in current housing or obtain permanent rental housing.
 - C. Can be used for housing relocation and stabilization services and short/medium term rental assistance.

The category of Homeless Prevention is also available in conjunction with a rapid re-housing program targeted at homeless clients that previously were eligible for rapid re-housing but lost eligibility status. These are very limited and require DMD approval.

4. Rapid Re-Housing
 - A. Available to serve persons who are below 30% AMI and are literally homeless

- B. Can be used to help a Homeless individual or family move into permanent housing and achieve Housing
- C. Can be used for housing relocation and stabilization services and short/medium term rental assistance

5. Administration - DMD does not keep administration for themselves, but allocates administration funds to one or more agencies up to 7.5% for coordinated entry administration at the city-wide level.

There is no cap on homeless prevention and rapid re-housing activities with ESG. Shelter and Street Outreach combined have a cap based on the amount of funds received by Emergency Shelter Grant in fiscal year 2010.

Table 1: Declaration of FY 2010 Grant Fund Commitments

Activity Type	Obligated Amount
Homeless Assistance	\$ 129,964
Homelessness Prevention	\$0
Administrative Activities	\$0
Total FY 2010 Award	\$129,964

**City of Evansville
Department of Metropolitan Development**

**Citizen Participation Plan for the Consolidated Planning Process
Community Development Block Grant (CDBG)
Emergency Solutions Grant (ESG)
Home Investment Partnership Grant (HOME)**

INTRODUCTION:

The City of Evansville (City), as a recipient of CDBG/ESG/HOME funds is required to complete a Consolidated Housing and Community Development Plan. The primary purpose of the community development and planning programs covered by the Citizen Participation Plan is to develop healthy urban communities by providing decent housing and a suitable living environment, and expanding economic opportunities principally for low and moderate income people. The U.S. Department of Housing and Urban Development requires the City to submit a detailed citizen participation plan that provides and encourages the participation of persons of low and moderate income who are residents of the areas in which these funds are proposed to be used.

I. PUBLIC NOTICE

There shall be an advanced 10-day public notice of the availability of required federal documents (e.g., the five-year Consolidated Plan, Annual Action Plans, and Consolidated Annual Performance and Evaluation Reports), and of all public hearings and meetings pertaining to the funds related to the Citizen Participation Plan.

The City of Evansville will continue to identify communication resources, to insure accessibility for all persons, regardless of their disability, language, or nationality to information provided by the City. The City has identified nine (9) known resources of communication that will be utilized by the City/DMD in providing notification to the public.

All public notices will be sent by email to the following organizations requesting the distribution of information. The Evansville Courier & Press and Our Times Newspaper will publish legal ads as requested.

1. **The Evansville Courier & Press** – local newspaper
2. Minority outreach newspapers and/or other media resources
 - a. **Our Times Newspaper**
 - b. **HOLA Newsletter**
 - c. **El Informador Latino**
3. **WNIN** – A local media agency that provides Public Service Announcements(PSA) in English and Spanish
4. **The Evansville Blind Association** – read PSAs to visually impaired
5. **City of Evansville** – post public notifications on City of Evansville website: Evansville.in.gov where links to plans and reports are made available for review and comments.
6. **United Neighborhoods of Evansville (UNOE)**
7. **The Evansville Housing Authority**
8. **Indiana Balance of State - CoC**
9. **Evansville Vanderburgh Public Library**

The advertisements announce the amount of federal funds available, the projected community development and housing activities to be undertaken, and the expected/actual population being served. Current operating agencies, and organizations on a contact mailing list receive emails regarding the public meetings. The DMD maintains an interested parties list of organizations or persons requesting notification of updated plans and public meetings.

Chapter 2.200 of the Evansville Municipal Code established an ordinance requiring online audio and video archived recordings of public meetings of government or advisory bodies. It is the intent to achieve greater transparency of local government by requiring the archiving of audio and video recordings of public meetings or local governing or advisory bodies via the Internet (Ord G-2014-35, passed 12-19-14). Most public meetings are conducted in the City-County Building, 1 NW Martin Luther King Jr. Blvd., Evansville, IN, either in conference room 307 or 301, where internet recording is available. Meetings and hearings are held at such locations that are accessible to the disabled and centrally located to the Focus areas. The City of Evansville will take whatever action is appropriate to encourage the participation of all its citizens, including minorities and non-English speaking persons, as well as persons with disabilities. The jurisdiction will take all due efforts to improve the public notification of events.

Any form of public notice will instruct entities interested in applying for these funds to contact the DMD and shall contain the following language, "The Department of Metropolitan Development does not discriminate on the basis of race, color, religion, national origin, age, gender or disability. If a reasonable accommodation such as a sign language interpreter is needed, please contact the Department at (812) 436-7823 (voice) or (812) 436-4928 (TDD) at least three (3) business days before the meeting."

II. PUBLIC HEARINGS AND MEETINGS

- A. Needs Hearings: At least two public meetings are held each year to assess community needs and establish funding priorities in order to update the City of Evansville's Consolidated Plan. Public notices are posted in local newspapers and other media resources **30-days prior** to the required submission of plans/reports to HUD. The public is encouraged to submit comments in writing to DMD or attend the Annual Action Plan and Consolidated Annual Performance and Evaluation Report (CAPER) meetings.
- B. Consolidated Plan: The Consolidated Plan Draft is made available on the City of Evansville website, www.evansville.in.gov and in the DMD office for not less than 30 days prior to submission to HUD. Several public meetings are conducted in the focus area for citizens' review of the plan. All written

comments are accepted up to four (4) days prior to submission of the Consolidated Plan. A summary of all comments are forwarded to the City Council and the Mayor as well as becoming part of the final Consolidated Plan.

- C. Annual Action Plan: The Annual Action Plan Draft is made available on the City of Evansville website, www.evansville.in.gov and in the DMD office for not less than 30 days prior to submission to HUD. One public meeting is conducted in the City-County Building for citizens' review of the plan. All written comments are accepted up to four (4) days prior to submission of the Action Plan. A summary of all comments are forwarded to the City Council and the Mayor as well as becoming part of the final Annual Action Plan.
- D. Consolidated Annual Performance Evaluation Report (CAPER): is made available online on the City of Evansville website, www.evansville.in.gov and in the DMD office. A summary of the CAPER will be made available to the public for review and comment not less than 30 days prior to submission to HUD. One public meeting is conducted in the City-County Building for citizens' review of the CAPER. All written comments are accepted up to four (4) days prior to submission of the CAPER. A summary of all comments are forwarded to the City Council and the Mayor as well as becoming part of the final CAPER.
- E. Substantial Amendments: A substantial amendment is defined as: the addition or deletion of an activity; or, a change in the location, scope, or beneficiary of an activity; or, an increase or decrease in program funds of at least 20% for any activity whose total allocation is \$100,000 or more. The Substantial Amendment is made available online on the City of Evansville website, www.evansville.in.gov and in the DMD office. A summary of the Substantial Amendment will be made available to the public for review and comment not less then 30 days prior to enacting the changes.

There shall be public notice given of any substantial amendment to the Consolidated Plan and a **thirty (30) day period** for the public to review and comment either orally or in writing. Comments will be considered and responded to in writing by the DMD.

III. CITIZEN COMMENTS/COMPLAINTS

Individuals, organizations, or neighborhood groups that have questions, comments or complaints pertaining to the Consolidated Plan, CDBG, ESG, HOME programs or proposals are encouraged to contact DMD for clarification, explanation, and/or assistance. All information and records relating to the federal funding process are open to the public for review. All inquiries should be directed to:

Department of Metropolitan Development
306 Civic Center Complex
One N. W. Martin Luther King, Jr. Blvd.
Evansville, Indiana 47708
Phone: (812) 436-7823
Fax: (812)436-7809
(TDD) (812) 436-4928

DMD will provide timely, substantive written response to all citizen complaints.

IV. TECHNICAL ASSISTANCE

DMD staff will work with an organization to develop an effective proposal. DMD staff is available to answer questions and explain eligibility and benefit requirements to potential applicants. All applicants are required to contact DMD and have their completed proposal forms reviewed for correctness and completeness prior to the

submission deadline.

V. CITIZEN ADVISORY COMMITTEE

The CAC is a seven (7) member body appointed by the Mayor to represent Evansville residents, especially the low-income community, in the allocation of funds process. Appointees represent housing, economic development and community development interests and are chosen on the basis of their personal knowledge about Evansville and the needs of the low-income community. All CAC meetings are open to the public.

CAC meet three (3) times during the grant review process; (1). CAC training and grant overview; CAC members receive a binder from DMD with ESG and Public Service CDBG grant proposals for evaluation and funding recommendations. Additional documentation includes: current HUD income guidelines, Needs Survey Results from Consolidated Plan, Low-Income Census Tract Map, and Grant requirements. (2). Agency presentations to CAC; opportunity for CAC to ask questions of agencies, and (3). CAC final recommendation; the seven member group recommends funding to the agencies and forwards to the Mayor.

Meetings are conducted in the City-County Building where the meetings are streamed Live online and recorded and archived for public comment.

VI. CONSOLIDATED PLANNING PROCESS

DMD will prepare a written description of all proposed uses of CDBG, HOME and ESG funds detailing all allocations, including proposed allocations to city agencies, in a summary (spreadsheet). Such description should provide sufficient detail to allow citizens to determine the degree to which they might be affected. At a minimum, this description shall include type of activity, location, and amount of federal money requested. This description along with a copy of each ESG and CDBG-Public Service proposals, will be distributed to CAC members and shall be made available to the general public for review **fourteen (14) days** before the CAC makes its recommendations to the Mayor. The summary spreadsheet containing these descriptions shall be provided upon request at no charge.

The CAC shall make recommendations to the Mayor on how to allocate CDBG Public-Service and ESG funds.

After review, the Mayor shall make funding recommendations to the City Council. The City Council, upon reviewing the recommendations of the Mayor, determines the projected expenditures for the proposed Annual Action Plan.

Availability of the proposed Annual Action Plan will be published as described in Section I **thirty (30) days** prior to final submission date.

After all comments have been reviewed, presented to the Mayor and City Council, and all changes made and ratified by the Mayor and City Council, the final Consolidated Plan shall be submitted to HUD forty-five (45) days prior to the end of the program year.

VII. ANTIDISPLACEMENT POLICY

DMD shall follow its written Anti-Displacement and Relocation Policy and provide annual reports to HUD as part of the Consolidated Annual Evaluation Performance Report. The policy is kept on file at DMD and is in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.

SECTION II PROGRAM REQUIREMENTS

Region 12 by vote through the Region 12 Regional Planning Council aka Homeless Services Council of Southwest Indiana on January 13, 2012 voted to have one single independent provider of homeless prevention and rapid re-housing services, coordinated and centralized city-wide at the system-level, and that Aurora was the most qualified to be that provider. Through the annual DMD funding cycle application cycle, agencies have the opportunity to apply to be the single independent provider of homeless prevention and rapid re-housing with ESG funds, Aurora has been the only applicant thus far.

The recommendation is as follows below:

Whereas, the Homelessness Prevention and Rapid Re-Housing Program (HPRP) was a onetime special funding made available through the American Recovery and Reinvestment Act of 2009 (ARRA aka federal stimulus funds.)

Whereas, the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act), enacted into law on May 20, 2009, consolidates three of the separate homeless assistance programs administered by HUD under the McKinney-Vento Homeless Assistance Act into a single grant program, and revises the Emergency Shelter Grants program and renames it as the Emergency Solutions Grants program.

Whereas, the United States Department of Housing and Urban Development (HUD) implemented HPRP as a pilot initiative for homeless prevention and rapid re-housing activities planned under the new Emergency Solutions Grant.

Whereas, HUD has appropriated a separate award of Emergency Solutions Grant funds mandated for use only as homeless prevention and rapid re-housing.

Whereas, the strict and very specific requirements for homeless prevention and rapid re-housing activities require an independent and separate program for the City of Evansville and State of Indiana Region 12.

Whereas, Aurora Inc. was the sole subgrantee and provider of homeless prevention and rapid re-housing funds as part of the HPRP program.

Whereas, there is a benefit of the continuation of experience that has been provided by Aurora Inc.

Whereas, Aurora Inc. is the only local agency with the capacity to carry out the homeless prevention and rapid re-housing activities under the new Emergency Solutions Grant within the City of Evansville

Now, therefore on January 13, 2012, be it recommended by the Homeless Services Council of Southwest Indiana that Aurora Inc. be the subgrantee and provider of homeless prevention and rapid re-housing activities under the new Emergency Solutions Grant for the City of Evansville and State of Indiana Region 12.

1) Eligibility Intake Criteria.

- For Rapid Rehousing: Utilize Homeless Documentation Form

-For Homeless Prevention: Utilize Homeless Prevention Documentation Form & Income Standard

See Documentation Requirements under Section III.

2) Written Policies and procedures

Subrecipients are required to create and maintain written policies and procedures that details program and contract expectations for staff and volunteers. They should include ESG program specific rules and expectations as outlined in this manual.

3) Keeping Accurate Financial and Service Delivery Records

Maintaining accurate records is an important aspect of management of ESG projects. Measurement of project performance relies on the tracking of information about services and activities. Sufficient records must be established and maintained to enable the subrecipient to show that ESG requirements are being met.

Therefore, it is important that accurate information and documentation regarding program activities and services provided with ESG funds is gathered and maintained. DMD requires consistent reporting on expenditure of funds, program activities and measurable outcomes. In order to report fully on program outcomes and activities, subrecipients should consistently gather demographic information on the population being served by the ESG program and consistently report the types of activities being provided to participants.

Subrecipients that utilize ESG funds under the Essential Service category for Case Management activities are required to enter all relevant client-level data including case notes into HMIS or DV Client Track (if it is a victim services provider) on a consistent basis.

ESG regulations require that records be maintained for a period of at least ***five years*** after the end of the grant term. Agencies must have in writing that records will be maintained for five years.

4) Coordination with other targeted homeless services

Subrecipients must coordinate and integrate, to the maximum extent practicable, ESG-funded activities with other programs targeted to homeless people in the area covered by the Continuum of Care or area over which the services are coordinated to provide a strategic, community-wide system to prevent and end homelessness for that area. These programs include: Permanent Supportive Housing Programs, HUD VASH programs, Education for Homeless Children, Health Care, Domestic Violence agencies, Health Care for Homeless Veterans, Youth and Runaway programs, etc.

5) System and program coordination with mainstream resources

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

Subrecipient staff will actively visit and/or contact homeless shelters and any other known areas where individuals who meet program eligibility requirements may be found in the community with a goal of engagement and admittance to the Program. Subrecipient staff will work closely with community agencies to build collaborative relationships and to become familiar with how to access available services for participants efficiently and effectively. Further, subrecipient staff will be responsible for developing a matrix of available resources in their community to use as a tool in directing participants to the appropriate agencies in order to prioritize and access services they need.

6) The Arizona Matrix Tool.

The Arizona Self Sufficiency Matrix Tool is a case management tool to assist with overall assessment of client needs, program planning, performance measurement and staff supervision. This matrix tool is to be completed by qualified case managers who have training and/or education in structured interviewing and the obtaining of personal information in a sensitive and appropriate manner. The tool is embedded in HMIS.

This tool provides a concrete number of how persons are progressing out of shelter into stabilized housing and while being housed how they are becoming more self-sufficient. It points out the highest barriers that need to be addressed to help support the participant in feeling stable in their housing and lead to case management goals in the housing plan. It provides a focus for the case manager and the participant.

7) Coordinated Entry Assessment: VI-SPDAT.

HUD has required that all Continuum of Care's have a Coordinated Access Assessment system that all projects and agencies who serve homeless persons to utilize as the first step into the system. This is to be utilized by all types of programs that would include: Safe Havens, Day Shelters, Emergency Shelters, Transitional Housing, Permanent Housing including Rapid Rehousing, ESG Homeless Prevention and Permanent Supportive Housing and Shelter Plus Care Programs Legacy projects.

Once the Continuum of Care has developed a coordinated entry process every ESG funded program or project within the BOS Continuum of Care's area must use that assessment system. The subrecipient must work with the BOS Continuum of Care to ensure the screening, assessment and referral of program participants are consistent with the established written standards.

The Steering Committee of the Indiana Balance of State Board selected the VI-SPDAT (Vulnerability Index-Service Prioritization Decision Assistance Tool) that will be embedded in HMIS software. Subrecipients of ESG RRHP funds are expected to utilize the VI-SPDAT as a tool for assessment.

8) Habitability

Subrecipients are required to conduct a habitability standards inspection on any unit that a participant will be receiving ANY ESG financial assistance such as any rental assistance, security deposit, last month's deposit, utility deposit, moving costs. Subrecipients must certify that the unit has passed habitability standards before any ESG funds may be released. In addition, an annual habitability standards inspection must be conducted for any unit in which ESG funds are being used. Fire code is more stringent than Housing Quality Standards (HQS), but otherwise HQS is preferred.

**Utilize the Habitability Standards Form
Recommended: Also Use HQS Form**

9) Ensuring Confidentiality

- A. The subrecipient must develop and implement written procedures to ensure:
1. All records containing personally identifying information (as defined in HUD's standards for participation, data collection, and reporting in a local HMIS) of any individual or family who applies for and/or receives ESG assistance will be kept secure and confidential;
 2. The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under the ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter; and
 3. The address or location of any housing of a program participant will not be made public, except as provided under a preexisting privacy policy of the recipient or subrecipient and consistent with state and local laws regarding privacy and obligations of confidentiality.
- B. The confidentiality procedures of the recipient and its subrecipient must be in writing and must be maintained in accordance with this section.
- C. In addition, subrecipient should keep written records or files pertaining to families secured and only allow authorized personnel access to these files.

10) Rent Reasonableness

Subrecipients must ensure that ESG funds used for rental assistance do not exceed the actual rental cost, which must be in compliance with HUD's standard of "rent reasonableness." "Rent reasonableness" means that the total rent charged for a unit must be reasonable in relation to the rents being charged during the same time period for comparable units in the private unassisted market and must not be in excess of rents being charged by the owner during the same time period for comparable non-luxury unassisted units. **Subrecipient must Utilize**

GoSection8 Software to receive rent reasonable checklist. It is free to utilize: <http://www.gosection8.com/>

11) Fair Market Rent

The unit must be at or below Fair Market Rent. Utilize the HUD Fair Market Rent website: <http://www.huduser.org/portal/datasets/fmr.html>

12) Tenant Rent Calculation

DMD encourages subrecipients to work with individual households to identify the financial resources needed to assist in returning to housing as quickly as possible. Subrecipients should be transparent and realistic when working with households to identify what financial assistance is available.

IHCDA does not require subrecipients to adhere to one set-financial assistance model in an effort to address the unique needs household's experience. Examples of subsidy models include gradually decreasing the amount of subsidy the household receives over the course of rental assistance or require the household to pay an increasing percentage of income the longer they receive subsidy.

A progressive engagement approach is encouraged. Progressive Engagement includes providing the minimum assistance necessary to assist a household in establishing permanent housing and reassessing their needs for financial assistance on a routine basis. It is recommended that subrecipients establish an initial period of assistance and revisit the potential for extension based on household needs as the subsidy limit is reached.

Subsidy Model Examples: *Below are common models used to establish subsidy guidelines. Subrecipients can adjust model amounts or percentages based on individuals needs of households.*

Decreased subsidy approach: This model is focused on decreasing the amount of subsidy the subrecipient provides. The subrecipient establishes a percentage of rent that will be subsidized for the household for a determined period of time. The provider/subrecipient communicates with the household how the subsidy provided will decrease over time to support the household in preparing to take over the full rent amount when the subsidy ends.

Example: Provider/Subrecipient pays 50% of the rent for months 1-3. Ongoing subsidy need is reviewed at the end of month two and determined that the household is not yet ready to take on the full amount of rent. The provider/subrecipient agrees to subsidize months 4-6 by paying 35% of the rent. In month five the provider/subrecipient revisits the need for ongoing assistance and it is determined that the household can take over the full rent amount after month 7. The provider agrees to pay 20% of the rent in month 7. The household pays 100% of their rent in month 8.

Increased tenant income approach: This model focuses on increasing the percentage of income the household contributes to their rent over the period of time assistance is provided. The subrecipient will work with the household to determine what percentage of their income will be dedicated to the total rent amount once the subsidy ends and gradually increases the percentage of income the household pays toward their monthly rent with the goal of preparing the household to take over the full rent amount at the end of the subsidy period.

Example: Prior to moving in it is determined that the rent of the selected unit is the equivalent of 65% of the household's adjusted monthly income. The household contributes 50% of their adjusted income to their rent in months 1-3 and the subrecipient subsidizes the remaining portion of rent. Ongoing subsidy need is reviewed at the end of month two and determined that the household is not yet ready to take on the full amount of rent. The provider/subrecipient agrees to subsidize months 4-6 and the household contribution is increased to 55% of their adjusted income. In month five the provider/subrecipient revisits the need for ongoing assistance and

it is determined that the household can take over the full rent amount after month 7. The household contributes 60% of their monthly income toward rent in month 7. The household pays 100% of their rent which is the equivalent to 65% of their monthly income in month 8.

Budget-based approach: This approach involves creating a budget with the household before their unit is selected/rented to establish what their rent contribution will be. Subrecipients/partners will work with households to identify their current household budget and select an amount of rent the household will contribute.

Setting Limits/Thresholds for Assistance: Subrecipients are encouraged to set a threshold for assistance, for example, if a household's rent is less than an equivalent of 50% of their income it is recommended that ongoing monthly assistance is not provided but that move in-assistance is provided to support the household in obtaining permanent housing.

Thresholds should be documented in the subrecipients program manual and communicated to potential and enrolled households seeking Rapid Rehousing assistance.

The Tenant's portion of the rent is paid directly to the landlord and is subject to the same timeliness requirements as the overall rent. In other words, failure to pay the tenant portion of the rent for an ESG assisted unit can be reason for eviction.

13) Utility payments.

ESG funds may be used for up to 24 months of utility payments per program participant, including 6 months of utility payments in arrears, per service. A partial payment of utility bill counts as one month. Utility payments must not be paid in situations where the standard practice of the landlord is to include utility costs in the rent. See Section IV for more information on the requirements.

Subrecipients must obtain proof that a participant or a household member has a utility account in his/her name or proof of responsibility to make utility payments such as cancelled checks or receipts in his/her name from a utility company before utility payments are approved and released on behalf of the participant. Copies of the proof of responsibility should be obtained and maintained in the participant file. Utility payments may co-occur with rental assistance when the lease does not include utilities.

Utilize utility allowance as a guide of the amount of utilities can be paid. See IHCDA website for current allowance in the county. These change annually around May or June.
<http://www.in.gov/myihcda/2430.htm>

Once a unit is determined to meet the FMR and rent reasonableness requirements, ESG funds may be **used to pay for the actual utility costs**. The utility allowance calculation is only used to determine whether the unit meets the FMR standard.

14) Re-evaluations for homelessness prevention and rapid re-housing assistance.

The subrecipient must re-evaluate the program participant's eligibility and the types and amounts of assistance the program participant needs not less than once every 3 months for program participants receiving homelessness prevention assistance, and not less than once annually for program participants receiving rapid re-housing assistance. At a minimum, each re-evaluation of eligibility must establish that:

- (i) The program participant does not have an annual income that exceeds 30 percent of median family income for the area, as determined by HUD; and

- (ii) The program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance.

The subrecipient should require each program participant receiving assistance to notify the recipient or subrecipient regarding changes in the program participant's income or other circumstances (*e.g.*, changes in household composition) that affect the program participant's need for assistance under ESG. When notified of a relevant change, the recipient or subrecipient must re-evaluate the program participant's eligibility and the amount and types of assistance the program participant needs.

15) Housing Stability Case Management.

While providing homelessness prevention or rapid rehousing assistance to a program participant, the subrecipient must:

- (i) The subrecipient is required to provide and the participant is required to meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability; and
- (ii) Develop a plan to assist the program participant to retain permanent housing after the ESG 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.
- (iii) Utilize the Arizona Self Sufficiency Matrix Tool as a guide for identifying goals to be targeted for participants within their housing plan. The Arizona Tool is embedded in HMIS.

16) Housing Plan.

The ESG program uses standardized Housing Case Management Plans. There are two basic forms of the Plan. The Homeless Prevention Phase Plan is intended for households which receive prevention assistance in an effort to maintain their present housing. The Rapid Re-Housing Phase Plan is aimed at households who are already experiencing homelessness.

The Housing Plan must be completed and placed in the participant file. The Housing Plan Form is embedded in HMIS as a template under "case notes." The Plan is a tool that will be used to assess and develop a strategy to achieve participant stability within the timeframe established by program regulations.

Utilize the information from the Arizona Matrix Tool to provide guidance on what goals should be targeted to provide self-sufficiency.

Additionally, the Plan must be used to actively assist participants in meeting established outcomes based upon individual participant need. The Plan should be referenced, revised and updated regularly throughout a participant's participation in the program. Either plan may address short term or intermediate term (up to 12 months) goals which are directly tied to the household's ability to recover and/or maintain housing stability.

All goals are to be written in observable and concrete terms, *e.g.*

"Will increase household income-- through part-time employment of spouse" or;

"Will obtain access to transportation – by relocating to apartment close to bus route" – with the first portion the goal and the remainder an example of an objective.

All goal statements should include specific objectives, which may be understood as "way points" in reaching the goal.

Typically, objectives may be added to the Housing Plan as the participant achieves each “step” but it is also allowable for the case manager and the participant to outline all the objectives when formulating a goal. This can give a participant a “road map” to follow in achieving a mutually agreed upon goal. Goals are not realistic unless they are understood by and accepted by the ESG participant. Interventions are services or direct assistance that will facilitate the participant in reaching the goal.

Form: ESG Housing Plan: Prevention: embedded in HMIS as a template under “case notes”.

Form: ESG Housing Plan: Rapid Re-Housing: embedded in HMIS as a template under “case notes”.

17) Termination of Participation and Grievance Procedure

It is important that subrecipients effectively communicate termination and grievance procedures to participants and ensure that the procedures are fully understood. Posting the policy on a bulletin board in a common area within the facility is an effective way to ensure that the termination and grievance procedures are available for participants to access at any time.

- A. If a participant violates ESG program requirements, the subrecipient may terminate assistance in accordance with a formal process established by the subrecipient that recognizes the rights of individuals affected. The subrecipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases.
- B. To terminate rental assistance or housing relocation and stabilization services to a program participant, the required formal process, at a minimum, must consist of:
 1. Written notice to the program participant containing a clear statement of the reasons for termination;
 2. 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
 3. Prompt written notice of the final decision to the program participant.
- C. Termination under this section does not bar the recipient or subrecipient from providing further assistance at a later date to the same family or individual.

18) Participation of People with Lived Experiences of Homelessness

- A. Subrecipient must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policy-making entity of the subrecipient, to the extent that the entity considers and makes policies and decisions regarding any facilities, services, or other assistance that receive funding under Emergency Solutions Grant (ESG).
- B. If the subrecipient is unable to meet requirement under paragraph (a), it must instead develop and implement a plan to consult with homeless or formerly homeless individuals in considering and making policies and decisions regarding any facilities, services, or other assistance that receive funding under Emergency Solutions Grant (ESG). The plan must be included in the annual action plan required under 24 CFR 91.220.
- C. To the maximum extent practicable, the subrecipient must involve homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under ESG, in providing services assisted under ESG, and in providing services for occupants of facilities assisted under ESG. This involvement may include employment or volunteer services.

SECTION III: ELIGIBILITY CRITERIA

1) ESG Rapid Rehousing Eligibility Criteria:

Rapid Re-Housing Assistance may be provided to individuals and families that are homeless under Paragraph 1 or Paragraph 4 of the homeless definition set forth in 24 CFR 576.2.

Rapid Re-housing (576.104):

ESG funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing. This assistance, referred to as rapid re-housing assistance, may be provided to program participants who meet the criteria:

Homeless means: Paragraph 1 or 4 of the homeless definition set forth in 24 CFR 576.2:

Paragraph 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;

Paragraph 4) Any individual or family who:

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

The individual and family must also live in an emergency shelter or other place described in paragraph (1) of the "homeless" definition.

2) Rapid Re-Housing Documentation Requirements:

Paragraph 1:

A signed and dated general certification from an outreach worker verifying that the services are going to homeless persons, and indicates where the persons served reside.

Staff should provide written information obtained from third party regarding the participant's whereabouts, and, then sign and date the statement. Written referral from the agency.

Written verification from the institution's staff that the participant has been residing in the institution for less than 90 days; and information on the previous living situation as being homeless in shelter or streets.

Written verification if available. Self report is acceptable. Utilize the area on the form for person to self declare and then sign and date.

Paragraph 4:

Acceptable Evidence for Individuals Fleeing Domestic Violence:

Oral statement by the individual or head of household seeking assistance, that is certified by the individual or head of household; and where the safety of the household is not in jeopardy:

Written observation by intake worker; or

Written referral by a housing or service provider, social worker, or other organization from whom the household has sought assistance for domestic violence.

If the individual or family is being admitted to a domestic violence shelter or is receiving services from a victim service provider, the oral statement need only be documented by a certification of the individual or head of household, or by the intake worker.

The purpose of ESG funds for rapid re-housing is to assist eligible program participants to quickly obtain and sustain stable housing. Therefore, subrecipients providing assistance will utilize a process to assess, for all potential program participants, their level of service need, other resources available to them, and the appropriateness of their participation in the rapid re-housing assistance portion of ESG.

Program participants who require longer-term housing assistance and services should be directed to programs that can provide the requisite services and financial assistance. In such cases, the ESG may serve as a “bridge” to permanent supportive housing if the housing program has been identified, and is identified as homeless and disabled at time that Rapid Rehousing assistance began.

There is no income threshold to be met with at intake with Rapid Rehousing. Only that they are homeless under these categories.

3) ESG Homeless Prevention Eligibility Criteria:

Homeless Prevention funds opened up as a pilot program starting in 2016. Clients who were originally identified as clients for rapid re-housing, but subsequently lost their homeless status or qualified as homeless under other federal definitions are the intended targets of homeless prevention funds. Use of homeless prevention funds are on a case by case with DMD. Clients must also be eligible under HUD requirements for homeless prevention, and not able to be served with diversion or other funds.

ESG funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the “homeless” definition in 24 CFR 576.2.

This assistance, referred to as homelessness prevention, may be provided to individuals and families who meet the criteria under the “at risk of homelessness” definition, or who meet the criteria in paragraph (2), (3), or (4) of the “homeless” definition in 24 CFR 576.2 and have an annual income below 30 percent of median family income for the area, as determined by HUD. The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant's current permanent housing or move into other permanent housing and achieve stability in that housing.

Paragraph 2: Individual or family, who will imminently lose their primary nighttime residence, provided that:

- 1) Residence will be lost within 14 days of the date of application for homeless assistance;
- 2) No subsequent residence has been identified; **AND**
- 3) The individual or family lacks the resources or support networks, *e.g.*, family, friends, faith-based or other social networks, needed to obtain other permanent housing;

These may include: At Risk of Homelessness:

- a) Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; OR
- b) Is living in the home of another because of economic hardship; OR
- c) Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; OR
- d) Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; OR
- e) Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; OR
- f) Is exiting a publicly funded institution or system of care; 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 Con Plan

Paragraph 4) Any individual or family who:

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

And with these possible housing risk criteria, the family median household income must be at 30% or lower median income to qualify for HP funds.

4) ESG Homeless Prevention Documentation Requirements:

Paragraph 2:

At least one of the following stating that the household must leave within 14 days:

A court order resulting from an eviction notice or equivalent notice, or a formal eviction notice;

For individuals in hotels or motels that they are paying for, evidence that the individual or family lacks the necessary financial resources to stay for more than 14 days; or

An oral statement by the individual or head of household stating that the owner or renter of the residence will not allow them to stay for more than 14 days.

The intake worker must verify the statement either through contact with the owner or renter, or documentation of due diligence in attempting to obtain such a statement.

Certification by the individual or head of household that no subsequent residence has been identified.

Self-certification or other written documentation that the individual or head of household lacks the financial resources and support networks to obtain other housing.

Paragraph 3:

A nonprofit, state, or local government entity that administers the other federal statute must certify that household qualifies as homeless under that statute's definition.

To document that the individual has not had a lease, occupancy agreement, or ownership interest in housing in the last 60 days, certification by the individual or head of household, written observation by an outreach worker, or referral by a provider.

To document that the individual or family has moved two times in the past 60 days, a certification from the individual and supporting documentation, including records or statements from each owner or renter of housing, shelter or housing provider, or social worker, case worker, or appropriate official of an institution where the individual or family resided. Where these statements are unobtainable, the intake worker should include a written record of his or her due diligence in attempting to obtain them.

Evidence of barriers includes: Written diagnosis from a licensed professional, employment records, department of corrections records, literacy, and English proficiency tests.

For disability, any of the above, written verification from the Social Security Administration (or a disability check receipt), or observation of the intake worker of disability, which must be confirmed within 45 days by an appropriate professional.

Paragraph 4:

Acceptable Evidence for Individuals Fleeing Domestic Violence:

Oral statement by the individual or head of household seeking assistance, that is certified by the individual or head of household; and where the safety of the household is not in jeopardy:

Written observation by intake worker; or

Written referral by a housing or service provider, social worker, or other organization from whom the household has sought assistance for domestic violence.

If the individual or family is being admitted to a domestic violence shelter or is receiving services from a victim service provider, the oral statement need only be documented by a certification of the individual or head of household, or by the intake worker.

It can be more challenging to identify persons who are housed but who have a very high risk of becoming homeless. There are many people who are housed and have great need but would not become homeless if they did not receive assistance. Subrecipients are encouraged to target prevention assistance to those individuals and families at the greatest risk of becoming homeless.

The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant's current permanent housing or move into other permanent housing and achieve stability in that housing. Homelessness prevention must be provided in accordance with the housing relocation and stabilization services requirements in 24 CFR 576.105, the short-term

and medium-term rental assistance requirements in 24 CFR 576.106, and the written standards and procedures established under 24 CFR 576.400.

HUD requires subrecipients to evaluate and certify the **eligibility of program participants at least once every 3 months for all persons receiving medium-term rental assistance or other ESG assistance**. Similarly, subrecipients should carefully assess a household's need and appropriateness for ESG assistance. If the household needs more intensive supportive services or long-term assistance than the subrecipient can provide, or if a household is not at risk of imminent homelessness, subrecipients must work to link them to other appropriate available resources.

SECTION IV: HOUSING RELOCATION & STABILITATION SERVICES

1) Financial Assistance

Financial assistance is limited to the following activities:

Rental application fees: ESG funds may pay for the rental housing application fee that is charged by the owner to all applicants

Security deposits: ESG funds may pay for a security deposit that is equal to no more than 2 months' rent.

In contrast to the requirements regarding rental assistance payments, security and utility deposits covering the same period of time in which assistance is being provided through another housing subsidy program are eligible, as long as they cover separate cost types. One example of this would be providing a security deposit for a participant receiving a HUD VA Supportive Housing (VASH) voucher, which provides rental assistance and services.

Last month's rent: If necessary to obtain housing for a program participant, the last month's rent may be paid from ESG funds to the owner of that housing at the time the owner is paid the security deposit and the first month's rent. This assistance must not exceed one month's rent and must be included in calculating the program participant's total rental assistance, which cannot exceed 24 months during any 3-year period.

Utility deposits: ESG funds may pay for a standard utility deposit required by the utility for all customers for the utilities listed under the utility payment section.

Utility payments: ESG 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 cost assistance: ESG 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 for services (housing search & placement and/or case management) and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.

2) Service Costs

Subject to the general restrictions under the homeless definitions of homeless prevention and rapid rehousing, 576.103 and 576.104, ESG funds may be used to pay the costs of providing the following services:

i. Housing Search and Placement

ESG funds may be used for services or activities designed to assist individuals or families in locating, obtaining, and retaining suitable permanent housing include the following:

- 1) Assessment of housing barriers, needs, and preferences;

- 2) Development of an action plan for locating housing;
- 3) Housing search;
- 4) Outreach to and negotiation with owners;
- 5) Assistance with submitting rental applications and understanding leases;
- 6) Assessment of housing for compliance with Emergency Solutions Grant (ESG) requirements for habitability, lead-based paint, and rent reasonableness;
- 7) Assistance with obtaining utilities and making moving arrangements
- 8) Tenant counseling.

Utilize Go Section8 software used for determination of rent reasonableness. Site: <http://www.gosection8.com/>.

ii. Housing Stability Case Management

ESG funds may be used to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing. This assistance cannot exceed 30 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the in permanent housing. Component services and activities consist of:

- 1) Using the centralized or coordinated assessment system as required under § 576.400(d), to evaluate individuals and families applying for or receiving homelessness prevention or rapid re-housing assistance;
- 2) Conducting the initial evaluation required under § 576.401(a), including verifying and documenting eligibility, for individuals and families applying for homelessness prevention or rapid rehousing assistance;
- 3) Counseling;
- 4) Developing, securing, and coordinating services and obtaining Federal, State, and local benefits;
- 5) Monitoring and evaluating program participant progress;
- 6) Providing information and referrals to other providers;
- 7) Developing an individualized housing and service plan, including planning a path to permanent housing stability; and
- 8) Conducting re-evaluations required under § 576.401(b).

iii. Mediation:

ESG 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.

iv. Legal Services:

ESG funds may pay for legal services, as set forth in § 576.102(a)(1)(vi), except that the eligible subject matters also include landlord/tenant matters, and 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.

v. Credit Repair:

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

3) **Maximum Amounts and Periods of Assistance:**

The recipient may set a maximum dollar amount that a program participant may receive for each type of financial assistance under financial assistance (1) of this section. The recipient may also set a maximum period for which a program participant may receive any of the types of assistance or services under this section. However, except for housing stability case management, the total period for which any program participant may receive the services under service costs paragraph (2) of this section **must not exceed 24 months during any 3-year period**. The limits on the assistance under this section apply to the total assistance an individual receives, either as an individual or as part of a family.

4) **Use of Other Subsidies:**

Financial assistance cannot be provided to a program participant who is receiving the same type of assistance through other public sources or 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.

SECTION V RENTAL ASSISTANCE

1) **Provisions**

- 1) *Use with other subsidies.* Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance, or living in a housing unit receiving project-based rental assistance or operating assistance, through other public sources. 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.
- 2) *Rent Restrictions.* Rental assistance cannot be provided if it exceeds the Fair Market Rent (FMR) established by HUD, as provided under 24 CFR part 888, and complies with HUD's standard of rent reasonableness, as established under 24CFR 982.507.

Rent must meet rent reasonableness standards and CANNOT EXCEED HUD's published FMRs for the area. In some communities, the reasonable rent for a specific unit may be lower than the FMR that has been established for the community.

For purposes of calculating rent under this section, the rent shall equal the sum of the total monthly rent for the unit, any fees required for occupancy under the lease (other than late fees and pet fees) and, if the tenant pays separately for utilities, the monthly allowance for utilities (excluding telephone) established by the public housing authority for the area in which the housing is located.

Utility Allowance guidance is released annually (May or June). They are located at:
<http://www.in.gov/myihcda/2430.htm>

2) Rental Assistance Agreements

- 1) *Rental assistance agreement.* The subrecipient can make rental assistance payments only to an owner with whom the sub recipient has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided, including the requirements that apply under this section. The rental assistance agreement must provide that, during the term of the agreement, the owner must give the 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.
- 2) *Late payments.* The subrecipient must make timely payments to each owner in accordance with the rental assistance agreement. The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease. The subrecipient is solely responsible for paying late payment penalties that it incurs with non-ESG funds.
- 3) *Lease.* Each program participant receiving rental assistance must have a legally binding, written lease for the rental unit, unless the assistance is solely for rental arrears. The lease must be between the owner and the program participant. Where the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease, if the agreement gives the program participant an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented by the owner's financial records, rent ledgers, or canceled checks.
- 4) *Tenant-based rental assistance.*
 - a) A program participant who receives tenant-based rental assistance may select a housing unit in which to live and may move to another unit or building and continue to receive rental assistance, as long as the program participant continues to meet the program requirements.
 - b) The recipient may require that all program participants live within a particular area for the period in which the rental assistance is provided.
 - c) The rental assistance agreement with the owner must terminate and no further rental assistance payments under that agreement may be made if:
 - i) The program participant moves out of the housing unit for which the program participant has a lease;
 - ii) The lease terminates and is not renewed; or
 - iii) The program participant becomes ineligible to receive ESG rental assistance.

In general, the ESG Homeless Prevention Activity will offer rental assistance at 3 month intervals –ESG State approves **up to 12 months if needed.** The Rapid Re-Housing Program will offer rental assistance up to **maximum of 12 months. Reevaluations in the RRH program are not conducted as federal regulations do not require reevaluations until after 12 months of assistance have been provided.**

DMD recommends evaluating a person's need for continued subsidy in the case of an absence in 30 day increments when a participant is away because of medical treatment or jail/incarceration. The subsidy cannot be provided for longer than 90 days in any scenario and should not be provided for longer than 30 days in most instances.

Rental assistance payments cannot be made on behalf of eligible individuals or families for the same period of time and for the same cost types that are being provided through another federal, state or local housing subsidy program.

SECTION VI: REPORTS AND HMIS

1) Reports

ESG subrecipients are required to submit data upon request and annual report to DMD. Please *e-mail* these reports to DMD.

2) **Homeless Management Information System**

The Homeless Management Information System (“HMIS”) is a secure, confidential electronic data collection system used to determine the nature and extent of homelessness. **The Subrecipient is required to enter data into HMIS on a regular and consistent basis, which is defined as data entry within two weeks from the time of intake.***

HMIS is managed by IHCDA on behalf of the City of Evansville agencies as we are part of the Indiana Balance of State CoC.

DMD will regularly monitor HMIS usage to verify consistent data entry for applicable shelters. Data must be entered for the ESG funded shelter program and all other residential programs serving homeless individuals and families. The HMIS data elements to be collected are determined by HUD. The HMIS system is used to report to HUD on an annual basis and to aid in local and statewide policy and planning.

Subrecipients that utilize Essential Service funds for Case Management activities are required to enter all relevant client level data including case notes into HMIS or DV ClientTrack (if the subrecipient is a victim services provider) on a consistent basis.

Victim services providers are not allowed to enter data into the HMIS but must enter data into a comparable database as described below.

Victim service providers must enter client-level data on ESG beneficiaries/clients into a comparable database, which collects all of the HMIS universal data elements listed in this paragraph and generates unduplicated aggregate reports. Victim service providers are encouraged to use DV ClientTrack database. The data required for entry into DV ClientTrack database or the victim service provider’s comparable database must include the following data elements: Name, Social Security Number, Date of Birth, Ethnicity, Race, Gender, Veteran Status, Disabling Condition, Residence Prior to Program Entry, Zip Code, Length of Stay at Previous Residence and Homeless Cause.

To sign up for DV ClientTrack, please contact Jill Robertson at jirobertson@ihcda.in.gov at IHCDA. Victim service providers within the Balance of State Continuum of Care can choose to opt into DV ClientTrack. Access to the data entered into the system will be restricted to the organization that entered it and therefore the system will be compliant with the Violence Against Women’s Act (VAWA). The system will collect client-level data over time including, but not limited to all of HMIS’s universal data elements, and generate unduplicated aggregate reports based on the data. Information entered into this comparable database will not be entered directly into or provided to an HMIS.

Client-level data including personally identifying information should never be stored in unsecured platforms including but not limited to Google Docs.

***Failure to enter data on a regular and consistent basis may result in the termination of the ESG agreement. ***

3) Statewide Point-in-Time Homeless Count

The subrecipient is required to participate in the annual Statewide Point-in-Time count in collaboration with its regional Continuum of Care by submitting appropriate data upon request by deadlines established by the IHCDA ESG Program Coordinator or the HMIS/ClientTrack Manager.

All subrecipients will be required to meet the following minimum standards for HMIS/ESG data collection and reporting;

- Subrecipients must enter into a HMIS/ESG Agency Participation Agreement and attend User training if they have not already attended.
- All subrecipient staff that participates in ESG eligible activities must have regular and convenient access to a computer with a high speed Internet connection.
- All subrecipient staff that participates in ESG eligible activities must have a unique assigned user name and password that they can access regularly during work hours. Each such user must sign a Code of Ethics statement prior to receipt of their log in and password.

SECTION VII: AWARD MONITORING

DMD will monitor a minimum of 33% every year, with the expectation that all programs will be monitored no less than every three years. New subrecipients and programs with new essential employees will be monitored within the first year of their grant agreement with DMD.

Subrecipients are expected to make available all participant level, financial and program records for periodic review on a schedule to be established by DMD. In addition, subrecipients will maintain participant files in compliance with the standard set by IHCDA. Significant deficiencies in file content or quality will result in required Plans of Corrective Action, with possible loss of allocated funds upon discovery of continuing deficiencies.

Program compliance and HMIS usage and data integrity will also be subject to regular and random monitoring by DMD staff. Monitoring of subrecipients may be conducted by DMD, IHCDA, local HUD Office of Community Planning and Development, HUD's Office of Special Needs Assistance Programs, HUD's Office of Inspector General, HUD's Office of Fair Housing and Equal Opportunity, or another federal agency to determine whether the subrecipient complied with the requirements of this program.

All shelters who will be subject to on-site monitoring will receive at least two weeks notification prior to the visit confirming the date and time of the monitoring and a monitoring checklist. The checklist contains a list of areas that will be reviewed and documents that will need to be made available at the time of monitoring.

Upon completion of the review, DMD will send a letter detailing all concerns and findings discovered during the monitoring visit. Agencies will be notified within 30 days of the monitoring visit unless an investigation of findings requires more time. If there are findings or concerns discovered, DMD will request the agency to submit a specific resolution or correction within a certain period of time.

Additionally, DMD staff may be available throughout the program year to conduct interim monitoring to help new subrecipients or agencies with new staff ensure their continued compliance with the ESG program. Please contact DMD to schedule an interim monitoring.

SECTION VIII: LEAD BASED PAINT REQUIREMENTS

1) *Background*

The primary cause of childhood lead poisoning is deteriorating lead-based paint and lead-contaminated dust and soil in older housing units. Although lead was banned from residential house paint in 1978 by the Consumer Product Safety Commission (CPSC), an estimated 57 million older homes still contain some lead-based paint. Of these, some 3.8 million dwellings are thought to have both lead-based paint hazards and young children as residents.

The amount of lead-based paint in housing is significant. Tens of millions of housing units contain at least some lead-based paint. Children living in homes with lead-based paint become exposed to lead by directly eating chips of lead-based paint or chewing on protruding surfaces painted with lead-based paint. The more common route of exposure, however, is the ingestion of lead-bearing dust that is generated by the paint when it deteriorates, chinks, or is disturbed through renovation or even abrasion from the opening and closing of windows. Even in this less direct way, lead-based paint can be a source of lead poisoning.

The most common route of exposure for children is through ingestion of lead-contaminated dust. This dust sticks to moist hands as a child plays or crawls across the floor, and is then ingested via finger sucking or other normal hand-to-mouth activity. A child can also be poisoned by eating lead-based paint chips and lead-contaminated soil, and by being exposed to other environmental sources of lead from inside and outside the home. Additionally, repair and renovation activities, such as repainting, that disturb lead-based paint can generate significant levels of leaded dust to which children can be easily exposed.

“Lead-based paint hazards” have been defined in the Residential Lead-Based Paint Hazard Reduction Act of 1992, commonly referred to as “Title X,” as any of six conditions which can present lead exposures sufficient to cause adverse health effects. These include:

1. lead-contaminated dust;
2. deteriorated lead-based paint;
3. intact lead-based paint on friction surfaces;
4. intact lead-based paint on impact surfaces;
5. intact lead-based paint on chewable surfaces accessible to young children; and
6. lead contaminated bare soil.

2) *ESG Lead Requirements*

Since the ESG program deals primarily with the operation of short-term emergency shelters and the delivery of essential services to homeless persons, ESG is governed by Subpart K of the Lead-Based Paint regulations. According to the regulations, most emergency shelters are exempt from the lead-based paint regulations. Thus emergency housing using efficiencies, studio apartments, dormitories, single room occupancy units, barracks, group homes, or room rentals in residential dwellings are all excluded from the lead based requirements. The only ESG-assisted housing covered under the lead based paint requirements is longer-term transitional housing in an apartment with one or more bedrooms AND which has family residents who are part of a program requiring continual residence of more than 100 days.

The majority of ESG projects, with their relatively short stays in HUD-assisted housing, are exempt from the lead-based paint requirements. However, any ESG housing or services sites regularly frequented by children less than 6 years of age are encouraged to test for lead.

For long-term transitional housing, DMD requires all subrecipients to participate in educating the public on the hazards of lead poisoning. The EPA Lead brochures must be distributed to all households receiving long-term rental assistance. Documentation of this brochure must be maintained in each client file.

3) *Essential (Support) Services and Operations*

For eligible ESG Housing properties that receive federal assistance for essential supportive services or operations, a number of lead-based paint requirements apply. The subrecipient / should conduct the following activities:

1. Visual assessment of all painted surfaces to identify deteriorated surfaces;
2. Complete paint stabilization of all deteriorated surfaces.
3. Incorporate ongoing lead-based paint maintenance activities into the regular building maintenance operations; and
4. Notification as described above.

4) *Exemptions to the New Lead Based Paint Requirements*

- Residential structures built after January 1, 1978;
- Emergency action activities;
- Existence of Lead-Based Paint Unlikely;
- Areas where state and local governments banned lead-based paint prior to January 1, 1978;
- Properties found not to have lead-based paint during earlier testing that meets the requirements of prior evaluations;
- Properties where all lead-based paint has been identified and removed using approved methods;
- Human Threat Unlikely;
- Unoccupied units that will be demolished;
- Property not suitable for human residential habitation
- Rehabilitation that does not disturb paint;
- Child Occupancy Unlikely;
- Zero-room dwelling units;
- Elderly and disabled housing; and
- Emergency housing assistance (such as for the homeless) unless the assistance is for long-term assistance that lasts more than 100 days. In the case where longer-term housing assistance lasts for more than 100 days, then rule does apply.

5) *Long-term Rental Assistance*

If there will be a child under the age of 6 residing in the unit receiving ESG long-term housing, the award subrecipient must conduct a visual assessment for the presence of lead-based paint. Award Subrecipients cannot provide long-term rental assistance to any unit with lead-based paint present.

6) *Lead Hazard Evaluation*

The interior and exterior surfaces and common areas of the rental property must be visually assessed to identify deteriorated paints. Note: A visual assessment is not considered an evaluation that requires a notification of lead hazard evaluation, since the assessment does not evaluate lead-based paint and/or lead hazards.

If the visual assessment reveals deteriorated paint, the award subrecipient should notify the owner of the unit with inspection results. The owner is required to have the deteriorated paint tested for lead based paint or to assume the presence of lead based paint is its stabilization activities.

Award subrecipient staff should instruct the owner to conduct paint stabilization before the unit is occupied to control possible lead-based paint hazards.

Owners must correct the deteriorated paint identified during the visual assessment process using safe work practices in order to participate in the long-term rental assistance program.

7) *Lead Hazards Reduction*

At the completion of any paint stabilization, the owner must sign the Lead Certification 8.11 of the HQS inspection form or a form with equivalent language. This section instructs the owner to provide certification to the administering agency if any correction of defective paint occurs at the unit.

➤ **Training/Supervision.** Workers performing paint stabilization must be trained in accordance with OSHA regulations at 29 CFR 1926.59. In addition, they must meet one of the following:

- a) Supervision by a certified abatement supervisor;
- b) Successful completion of an accredited abatement supervisor course in accordance with 40 CFR 745.225;
- c) Successful completion of an accredited lead-based paint abatement worker course in accordance with 40 CFR 745.225;
- d) Successful completion of the Lead-Based Paint Maintenance Training Program developed by the National Environmental Training Association for EPA and HUD;
- e) Successful completion of the Remodeler's and Renovator's Lead-Based Paint Training Program developed by HUD and the National Association of the Remodeling Industry; or
- f) Successful completion of an equivalent course approved by HUD.

8) *Safe Work Practices.*

The owner must use safe work practices when conducting paint stabilization. Safe work practices include safe work methods, occupant protection, worksite preparation, and cleanup.

- (a) **Occupant Protection.** Work should be performed in a vacant unit if possible. If residents must remain inside the dwelling during work, a barrier to the room where stabilization is taking place should be erected and residents should not be allowed to enter the work area until clearance has been completed.
- (b) **Worksite Preparation.** The worksite should be contained using plastic sheeting extending five feet beyond the perimeter of the treated area in all directions on the floor. Ventilation systems should be turned off until work is complete.
- (c) **Cleanup.** After paint stabilization is complete, the worksite should be cleaned to remove all lead-based paint dust. Cleanup must be accomplished by wet washing surfaces with a lead specific detergent or its equivalent. Other cleaning devices, such as vacuum cleaners with HEPA filters, can be used during cleanup. Waste and debris must be disposed of in sealed containers in accordance with Federal and state waste disposal requirements. Use of a HEPA vacuum is recommended.

- 9) Exemptions to Safe Work Practices. Safe work practices are not required when treated areas are tested and found to be free of lead-based paint, or if the surface area being treated is smaller than a total of 2 square feet per room or 10 percent of the total surface area of interior components, such as window sills.
- 10) Occupant Protection. Property owners should protect residents and their personal belongings from exposure to lead-contaminated dust and debris during paint stabilization.
- (a) Personal belongings should be relocated to an area outside the treatment area or covered with an impermeable covering with all seams and edges taped shut.
 - (b) Residents may need to be temporarily relocated during treatment if they are exposed to lead-based paint hazards.
 - (c) Worksite Preparation. The award subrecipient should instruct the owner to control the spread of dust and debris at the worksite. This preparation should ensure that leaded dust, lead-based paint chips and other debris are contained within the worksite until they can be safely removed. Protective measures include sealing off vents and doorways with poly sheeting; covering floors and furniture with poly sheeting and wrapping debris in poly before disposal.
- 11) Cleanup. After paint stabilization is complete, the worksite should be cleaned to remove lead-based paint dust. Cleanup must be accomplished by wet washing surfaces a lead-specific detergent or its equivalent. Vacuum cleaners with HEPA filters should be used during cleanup. Waste and debris must be disposed in sealed containers in accordance with Federal and state disposal requirements.

12) Clearance

- Clearance must take place following paint stabilization. Clearance helps to ensure that lead-based paint hazards are controlled and the unit is safe for habitation.
- Paint stabilization and other lead hazard reduction efforts are considered complete when clearance is conducted. Clearance must be performed to ensure that lead-based paint hazards have been controlled.
 - (a) Clearance consists of a visual examination, collection of dust samples, and laboratory analysis of the samples for lead.
 - (b) Clearance is performed after lead hazard reduction and clean-up are complete.
 - (c) Dwellings must meet the following clearance standards.

	Floors ($\mu\text{g}/\text{ft}^2$)	Interior Window Sills ($\mu\text{g},\text{ft}^2$)	Window Troughs ($\mu\text{g}/\text{ft}^2$)
Lead in Dust (as measured by a dust wipe sample)	40	250	800

- Clearance Examiner. The administering agency is responsible for hiring a certified professional to conduct the clearance. This professional may be a certified risk assessor, lead-based paint inspector, or clearance technician. The clearance examiner must be independent from the individual or entity who conducted the paint stabilization or other lead hazard reduction, unless they are employees of the administering agency. Note: If agency employees are used, the same individual who conducted paint stabilization is not permitted to conduct clearance.

- Clearance Report. Prior to closing, and within 15 calendar days of the completion of the lead hazard reduction activities, the tenant must be notified of the clearance examination. The administering agency should ensure that the report is prepared and sent to the tenant. This report should include:
 - (a) Beginning and ending dates of the lead hazard reduction activities.
 - (b) Name and address of the firm conducting lead hazard reduction activities and the name of the supervisor assigned to the lead hazard reduction activities.
 - (c) The name, address and signature of each person conducting clearance sampling, the date of the clearance testing, and the certification number for each certified risk assessor or inspector who conducted sampling.
 - (d) The results of clearance testing and the name of each laboratory that conducted the analyses and the identification number of the laboratory.
 - (e) A detailed written description of the lead hazard reduction activities including methods used, location of rooms where activity occurred, and any suggested monitoring.
- Notify Tenants. The owner must provide a notice to tenants describing the results of the clearance examination. The award subrecipient should instruct the owner to notify tenants of clearance results.
- Staff Training. As a result of the new cleanup and clearance requirements, the administering agency will need to evaluate their program design and incorporate these new requirements.
 - (a) All program staff should have a basic understanding of the proper clearance procedures;
 - (b) Staff conducting the clearance examination must complete one of the acceptable training courses listed under paint stabilization;
 - (c) Program staff should understand the components of the clearance report and understand the procedures for notifying the buyer of the results.

SECTION IX: COORDINATED ENTRY

Region 12 Coordinated Entry



In 2009, the United States Department of Housing and Urban Development (HUD) instituted a rule that organizations receiving federal assistance to address homelessness must implement a coordinated assessment system for the delivery of housing and homeless services.

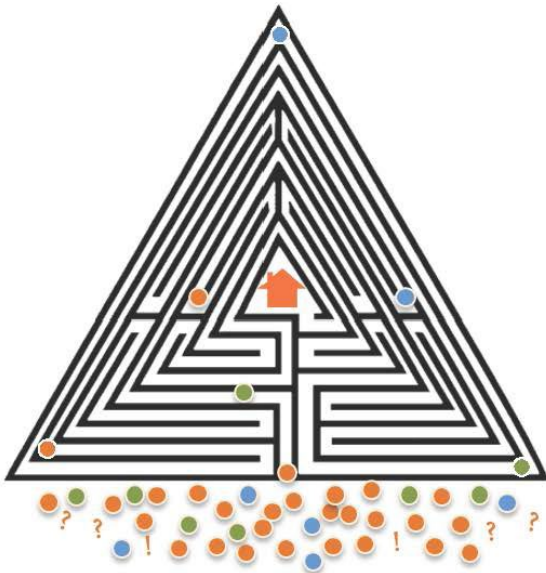
HUD said Coordinated Assessment was a new way to help people **move through the homeless services system faster, reduce new entries** into homelessness, and **improve data collection** and quality for homeless populations and services.

The Aurora Coordinated Entry Assessment Team (Street Outreach) will conduct an assessment of the individual using a standardized form. Currently they are using the VI-SPDAT as part of the Indiana Balance of State CoC. This information will be used to match the person with the most appropriate resources and identify the best path out of homelessness. Aurora is the lead agency for administration of coordinated entry with the assistance of ECHO Housing Corporation. Implementation of Coordinated Entry will help us maximize the use of scarce resources including employees, public services, and housing.

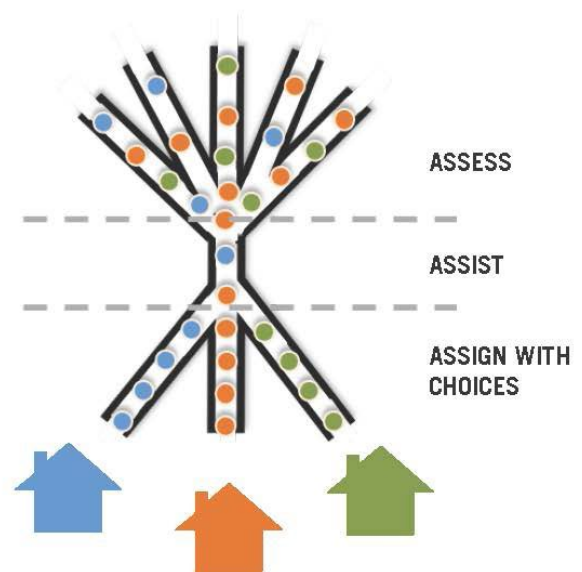
CES=Coordinated Entry System

A SIMPLER, AND MORE EFFECTIVE WAY

WITHOUT CES



WITH CES



Coordinated Entry FAQ

What is Coordinated Entry?

A coordinated entry system (CES) aligns all homeless service providers in a centralized process that seeks to deliver better client/program matches.

Is Coordinated Entry active today?

Yes, Region 12 launched Phase I of our CES on July 1, 2015. Presently, the CES is assigning placements in Permanent Supportive Housing only. We anticipate bringing other systems, such as Transitional Housing and Rapid Re-housing programs, only later this year during Phase II of implementation.

Will Coordinated Entry affect me?

Yes, HUD has mandated that all communities receiving CoC funds implement a CES. Within the coming 18-24 months, we anticipate that all homeless services will be accessed via the CES.

How does Coordinated Entry work?

All potential participants are assessed using a standardized assessment tool, developed by the National Alliance to End Homelessness, to produce a range of scores that seek to rank households based on vulnerability and barriers to housing.

How can I refer my client to be assessed?

Simply complete the “Request for Assessment” form and email to: region12.ces@gmail.com

How long will it take after completed the “Request for Assessment” form before my client is assessed?

This will vary based on the specifics of the individual you are referring. Upon receiving the Request for Assessment form, the Coordinated Entry Task Force will conduct a review of that participants HMIS history. That information, along with current program openings, will help dictate how these requests are prioritized.

I would like to follow-up on a client I previously requested an assessment on, how can I do this?

For this, or any other questions related to the Coordinated Entry System, you can contact the CE Task Force at: region12.ces@gmail.com

SECTION X: FINANCIAL MANAGEMENT

Before a subrecipient may first request reimbursement for ESG funds expended on specific activities/budget line items, the following items must be received by DMD:

- Signed/executed award agreement;
- Completed budget page aka Actual Project Information Form ;
- Authorized signature form for e-verify;
- Notice to Proceed
- Current enrolled status in System Awards Management (SAM); and
- Requested documentation in response to conditional funding (if applicable)
- **1:1 Match letter or affidavit for eligible ESG activities not used for match elsewhere**

1) Match

Each subrecipient must match dollar-for-dollar the ESG funding provided by HUD with funds from other public or private sources. A subrecipient may comply with this requirement through matching funds or voluntary efforts provided by any recipient or project sponsor.

Matching funds must be provided after the date of the grant award to the subrecipient. Funds used to match a previous ESG grant may not be used to match a subsequent grant award. No federal funds can be used for match, with the exception of Community Development Block Grant (CDBG).

All ESG Subrecipients are required to match their ESG program, one-to-one. For example, if the ESG award is \$10,000, the subrecipient must demonstrate \$10,000 as match. A match letter or affidavit must be submitted before a Notice to Proceed will be issued. Match must be used on ESG eligible activities not claimed elsewhere. The following items may be used as match:

Type of Match	Documentation required
Cash/Grant	Award letter or affidavit
Value or fair rental value of any donated material or building	Documentation of value of donated material or building. Documentation of previous year's match.
Value of any lease on a building	Documentation of value of lease on a building
Any salary paid to staff to carry out the program of the subrecipient	Timecards of staff member. Proof of salary payment (cancelled checks / bank statements). Summary list of all salaries counted as match. List should contain staff name, hours worked and total monetary value of time worked.
Value of the time and services contributed by volunteers to carry out the program of the subrecipient. (Note: Volunteers providing professional services such as medical or legal services are valued at the reasonable and customary rate in the local community.)	List containing all volunteer names, number of hours worked and total value of time contributed.

Examples of Possible Sources of ESG Match

Below are some examples of match that could be used as ESG match. Please note that in order for the match to be counted, the source must be eligible and its use must be an eligible ESG activity. Match can be provided by the subrecipient itself OR any other community agency, but must directly benefit the ESG participants and be provided during the award term in order to be counted. This list is not exhaustive.

In-Kind	Cash
211 Helpline: Time conducting I-HOPE assessments or other eligible expenses.	CDBG, CSBG
AIDS/HIV-related services provided to ESG participants	City or County funds
Alcohol and substance abuse services	Community Action Agencies
Bookkeeping/Administrative services for ESG program (but not billed to ESG)	Donations received as a result of the Neighborhood Assistance Program
Budgeting, credit repair service provided to participants in the community (but not billed to ESG)	ICJI grants, as eligible
Case management (not billed to ESG)	Local Foundations
Child care	Private donations
Clothing, Household, Hygiene items donated	Program income
Community Center - educational meetings related to housing, transportation vouchers, other eligible financial assistance	United Way
Donation Inventory Management	Township Trustees(s) assistance provided to ESG participants
Education, GED, classes (parenting)	
Employment assistance & Job Training	
Emergency Shelter/ Transitional Housing - services provided in program, not billed to ESG	
Faith Based Community; Ecumenical/Ministerial associations	
Food donated to participants by local churches (food stamps <i>cannot</i> be counted)	
Furniture donated	
Health care	
Housing Food kit, Move-in kit preparation	
Housing placement	
Hygiene Kit preparation	
Legal Services	
Life skills Training not billed to ESG	
Mental health services (CMHC's)	
Minority Health Coalitions	
Motel Stays	
Move in Kits donated	
Office space donated	
Street Outreach: Engagement, case management, emergency mental health services, transportation, services to special populations	
Outpatient Health services - Community Health Centers, other medical centers	
Rent, not paid with ESG	
Renovation of shelter facility, benefiting ESG	

participants	
School Corporations- eligible services provided to ESG participants	
Transportation	
Utilities, not paid with ESG	
Utility Companies- any amount that is waived from arrears or deposits off of amount due	
Volunteer - professional - local, customary rate	

2) **Budget Modifications**

At some point during the program year, the subrecipient may need to reallocate funds budgeted among their approved activities.

The Actual Project Information Sheet is required to submit budget modifications and is subject to approval by DMD.

Generally, increases and decreases of funds within previously approved activities will be approved. Budget modifications that request payment for something that has not been previously claimed will require further review, and may potentially be denied, although the DMD always tries to accommodate and serve agencies for reasonable requests.

3) **Claims**

IMPORTANT INFORMATION ON: HOW TO PROPERLY SUBMIT INVOICES FOR PAYMENT

Department of Metropolitan Development
Updated February 2016

WHEN IN DOUBT, CONTACT YOUR COMMUNITY DEVELOPMENT SPECIALIST (CDS)

Overview:

When submitting invoices for payment to the Department of Metropolitan Development, it is important that the information be submitted in a legible and concise order. Once received by DMD each invoice is reviewed a minimum of four (4) times before payment approval. In order to save time and prevent problems with the invoice payment and claim processing (prepared by DMD), it is important that you check to be sure you have submitted all the required paperwork and that your figures add up.

Claims are paid on a reimbursement basis and each reimbursement request submitted will be required to have five (5) basic components – however - Additional information may be required based on type of program.

1. An Operating Agency Invoice form properly signed and dated;
2. An Operating Agency Invoice Form, must be completed summarizing the items to be paid;
3. A copy of the monthly monitoring report for the month and/or a project status report, being reimbursed;
4. Copies of cleared checks (front & back) or a copy of the bank statement(s) verifying checks have cleared the account;
5. Supporting documentation with items for reimbursement highlighted.

If any one of the above items are missing or are incomplete, the agency will be contacted to correct the claim and resubmit for payment. All invoices are to be turned in by the last day of October, exceptions need to be approved by DMD. As soon as Public Service Agencies receive their Notice to Proceed, they should turn in invoices from January to current date.

Claim Order:

There is a definite order for submitting reimbursement request in order to speed processing.

That order is:

1. Operating agency invoice form properly completed. Properly completed means:
 - a. The expenses are properly broken down by line item
 - b. The invoice is signed by a representative of the agency (at least one copy must contain an original signature).
 - c. Each invoice must have a unique invoice number YY-ACCOUNT#-XX. “YY”= year is 16 for 2016, “ACCOUNT#” will be provided to you by your Community Development Specialist, “XX” is the sequential number of the invoice, 01 for 1st invoice submitted, 02 for 2nd invoice submitted, etc.
 - d. The invoice is dated the day it is signed. This is not the month you are requesting payment. Example of correct date: 7/12/13. Example of incorrect date: July 2013
2. Summary sheet with a breakdown of all expenses to be reimbursed. This summary sheet must be organized in the same order as the line items on the invoice form. It should list the amounts to be reimbursed and subtotaled by line item.
3. Copy of the monthly monitoring report (when applicable).
4. Copies of cleared checks (front & back) or a copy of the bank statement with check numbers and amounts highlighted to verify the checks have cleared your account (where applicable).
5. Support documentation in the following order for each amount to be paid. **Again, these should be organized in the same order as they are listed on the summary sheet.**
 - a. Salaries:
 - i. Costs that may be submitted for reimbursement include: Salary amount, health insurance and FICA. Copy of the paycheck with stub or a payroll journal from a third party. No in-house payroll journals will be accepted.
 - ii. Copies of actual time sheets for all employees’ salaries requested. The third-party payroll summary does not substitute for the timesheets. If the employee works on more than one program, the time sheet should show the amount of time spent on the program as well as total time worked. **All time sheets should be signed by the employee and supervisor.**
 - b. All other costs:
 - i. Copy of the check. If your bank statement includes copies of the check, you may submit that copy. If it does not, you must make a copy of the **signed** check.
 - ii. Copy of the invoice(s) the check is paying. If the invoice is a credit card bill, copies of the original receipts should be attached immediately behind the credit card bill to show details of items purchased. If you purchased something on credit, you must submit the credit card bill and the check copy in order to be reimbursed.
 - iii. Copies of all bills showing they have been paid, i.e. Utilities = Vectren bill & water bill.
 - iv. Copies of all receipts for items purchased for your project. Receipt must clearly state items purchased.
 - v. If cost is for printing, a copy of the item printed should be included and **must include the required acknowledgement(s).**
 - vi. If cost is for travel, you should also include a copy of verification of training (agenda or certificate of completion) and copies of all receipts to be reimbursed. Please note that travel expenses will not be reimbursed without receipts and an **approved** Travel Request Form from DMD.

Things to remember:

1. **All invoices are to be turned in by the last day of October, exceptions need to be approved by DMD. As soon as Public Service Agencies receive their Notice to Proceed, they should turn in invoices from January to current date.**
2. Double-check your work. Math errors are the number one reason invoices are sent back for corrections.

3. Copies must be complete and legible. Make sure documentation is not partially cut off when making copies.
4. Late fees and finance charges are not eligible expenses.
5. We do not pay past due amounts. You must submit current invoices.
6. Taxes are not eligible expenses for non-profits. The exception to this rule is hotel taxes.
7. Gifts, refreshments, etc. for staff and volunteers are not eligible expenses.
8. If requesting reimbursement for salaries and benefits for employees that spend time on more than one program, the time sheets must show a breakdown of time spent on each program. Salaries and benefits must be prorated based on the actual time spent on the program. If an employee is salaried and works more or less than 40 hours per week, reimbursement should be calculated as a percentage of time spent on the program, based on the actual hours worked.
9. If requesting reimbursement for rent and more than one program is provided at the same location, the rent must be prorated based on the space used by the programs.
- 10. Invoices are public records. Please black out social security numbers and account numbers.**
- 11. We do not pay from statements.** The exceptions to this rule are:
 - a. If the statement is for a service such as pest control and the vendor does not provide an invoice. Please provide a copy of the work order along with the statement.
 - b. The statement has very detailed information showing a complete listing of all charges in sufficient detail.
12. Invoices must be submitted monthly along with the monitoring report.
13. The amount invoiced must be tied (when applicable) to the number served and per unit cost (copy of monthly monitoring report.)
- 14. ALL REIMBURSEMENT REQUESTS SHOULD BE SUBMITTED TO THE FRONT DESK FOR DATE STAMPING AND RECORDING IN THE INVOICE LOG PRIOR TO BEING GIVEN TO THE CDS.**

4) OMB Audit and Financial Statements:

Each year, DMD collects Year-End Financial Statements and OMB audits from its subrecipients. To provide better customer service we have changed the submission process.

Organizations that are required to submit an OMB Audit formerly A133 must send their financials to DMD.

Organizations that are not required to submit an OMB audit still must submit their financials.

OMB Audit Required:

Subrecipients that expend \$750,000 or more in federal funds (as a collective whole from all of their federal awards) in a fiscal year must be audited in accordance with the requirements of 2 CFR 200.501, and provide a copy of such audit to DMD and to the Federal Audit Clearinghouse. If this applies to your organization, please submit a copy of your financial statements and OMB Audit to DMD.

OMB Audit Not Required:

Subrecipients that do not spend over \$750,000 in federal funds (as a collective whole from all of their grants) will only need to submit their year-end financial statement or Form 990. If this applies to your agency, please send a copy of year-end financial statement or Form 990.

5) Mandatory Disclosure.

The subrecipient must disclose, in a timely manner, in writing to DMD all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the ESG funds. The subrecipient's failure to make these disclosures may subject to the subrecipient to remedies of non-compliance set forth in 2 CFR 200.338.

If the total value of the subrecipient's currently active grants, cooperative agreements, and procurement contracts from all Federal awarding agencies exceeds \$10,000,000 for any period of time during the period of performance of this Federal award, then the subrecipient must maintain the currency of information reported to the System for Award Management (SAM) that is made available in the designated integrity and performance system (currently the Federal Awardee Performance and Integrity Information System (FAPIIS)) about civil, criminal, or administrative proceedings described in paragraph 2 of this award term and condition. This is a statutory requirement under section 872 of Public Law 110-417, as amended (41 U.S.C. 2313). As required by section 3010 of Public Law 111-212, all information posted in the designated integrity and performance system on or after April 15, 2011, except past performance reviews required for Federal procurement contracts, will be publicly available.

SECTION XI: CONFLICT OF INTEREST

1) Requirements

A. The provision of any type or amount of ESG assistance may not be conditioned on an individual's or family's acceptance or occupancy of emergency shelter or housing owned by the subrecipient, or a parent or subsidiary of the subrecipient. No subrecipient may, with respect to individuals or families occupying housing owned by the subrecipient, or any parent or subsidiary of the subrecipient, carry out the initial evaluation required under 24CFR 576.401 or administer homelessness prevention assistance under 24 CFR 576.103.

(i) The subrecipient must maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of contracts. No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. The officers, employees, and agents of the subrecipient may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, the subrecipient may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value. The standards of conduct must provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the subrecipient.

B. If the subrecipient has a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe, the subrecipient must also maintain written standards of conduct covering organizational conflicts of interest. Organizational conflicts of interest means that because of relationships with a parent company, affiliate, or subsidiary organization, the subrecipient is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization.

2) HUD Procedure for Individual Conflicts of Interest

A) Conflicts Prohibited

No persons (as described in persons covered) who exercise or have exercised any functions or responsibilities with respect to ESG activities or who are in a position to participate in a decision making process or gain inside information with regard to such activities, may obtain a financial interest or benefit from the activity, or have an interest or benefit from the activity, or have an interest in any contract, subcontract or agreement with respect thereto, or the proceeds there under, either for themselves or those with whom they have family or business ties, during their tenure or for one year thereafter.

B) Persons Covered

The conflict of interest provisions apply to any person who is an employee, agent, consultant, officer, or elected official or appointed official of the state, or of a unit of general local government, or of any designated public agencies, subrecipients which are receiving ESG funds.

C) Exceptions

A request for an exception to this conflict of interest prohibition will be considered by DMD only after the subrecipient has provided the following:

- A copy of the minutes from a public meeting denoting that the affected person has publicly disclosed the conflict of interest and has stated that he/she has withdrawn from functions or responsibilities with respect to the assisted activity in question.
- An opinion from the subrecipient's attorney that the interest for which the exception is sought would not violate State or local law.

Once DMD receives minutes of the public meeting and an opinion from the subrecipient's attorney, DMD will respond in writing as to whether or not an exception to the conflict of interest prohibition has been granted.

Should DMD approve the subrecipient's request, a completed Uniform Conflict of Interest Disclosure Statement must be provided to DMD as well as filed with the State Board of Accounts and the Clerk of the Circuit Court of Vanderburgh county in which executed the contract or purchase within 15 days after the final action toward awarding ESG funds to the person in question. A copy of this form can be found at <http://www.in.gov/sboa/files/Form236.pdf>.

DMD will approve an exception to this conflict of interest prohibition only after it has been determined that such an exception will serve to further the purpose of the Act and the effective and efficient administration of the ESG program.

UNIFORM CONFLICT OF INTEREST DISCLOSURE STATEMENT

Indiana Code 35-44-1-3

A public servant who knowingly or intentionally has a pecuniary interest in or derives a profit from a contract or purchase connected with an action by the governmental entity served by the public servant commits conflict of interest, a Class D Felony. A public servant has a pecuniary interest in a contract or purchase if the contract or purchase will result or is intended to result in an ascertainable increase in the income or net worth of the public servant or a dependent of the public servant who is under the direct or indirect administrative control of the public servant; or receives a contract or purchase order that is reviewed, approved, or directly or indirectly administered by the public servant. "Dependent" means any of the following: the spouse of a public servant; a child, stepchild, or adoptee (as defined in I.C. 31-3-4-1) of a public servant who is unemancipated and less than eighteen (18) years of age; and any individual more than one-half (1/2) of whose support is provided during a year by the public servant.

The foregoing consists only of excerpts from I.C. 35-44-1-3. Care should be taken to review I.C. 35-44-1-3 in its entirety.

1. **Name and Address of Public Servant Submitting Statement:** _____

2. **Title or Position With Governmental Entity:** _____

3. a. **Governmental Entity:** _____

b. **County:** _____

4. **This statement is submitted (check one):**

a. _____ as a "single transaction" disclosure statement, as to my financial interest in a specific contract or purchase connected with the governmental entity which I serve, proposed to be made by the governmental entity with or from a particular contractor or vendor; or

b. _____ as an "annual" disclosure statement, as to my financial interest connected with any contracts or purchases of the governmental entity which I serve, which are made on an ongoing basis with or from particular contractors or vendors.

5. **Name(s) of Contractor(s) or Vendor(s):** _____

6. **Description(s) of Contract(s) or Purchase(s)** (Describe the kind of contract involved, and the effective date and term of the contract or purchase if reasonably determinable. Dates required if 4(a) is selected above. If "dependent" is involved, provide dependent's name and relationship):

7. **Description of My Financial Interest** (Describe in what manner the public servant or "dependent" expects to derive a profit or financial benefit from, or otherwise has a pecuniary interest in, the above contract(s) or purchase(s); if reasonably determinable, state the approximate dollar value of such profit or benefit.):

(Attach extra pages if additional space is needed)

8. **Approval of Appointing Officer or Body** (To be completed if the public servant was appointed by an elected public servant or the board of trustees of a state-supported college or university):

I (We) being the _____ of
(Title of Officer or Name of Governing Body)

_____ and having the power to appoint
(Name of Governmental Entity)

the above named public servant to the public position to which he or she holds, hereby approve the participation to the appointed disclosing public servant in the above described contract(s) or purchase(s) in which said public servant has a conflict of interest as defined in Indiana Code 35-44-1-3; however, this approval does not waive any objection to any conflict prohibited by statute, rule, or regulation and is not to be construed as a consent to any illegal act.

_____	_____
_____	_____
_____	_____
Elected Official	Office

9. **Effective Dates** (Conflict of interest statements must be submitted to the governmental entity prior to final action on the contract or purchase.):

_____	_____
Date Submitted	Date of Action on Contract or Purchase

10. **Affirmation of Public Servant:** This disclosure was submitted to the governmental entity and accepted by the governmental entity in a public meeting to the governmental entity prior to final action on the contract or purchase. I affirm, under penalty of perjury, the truth and completeness of the statements made above, and that I am the above named public servant.

Signed: _____
(Signature of Public Servant)

Date: _____

Within 15 days after final action on the contract or purchase, copies of this statement must be filed with the State Board of Accounts, Indiana Government Center South, 302 West Washington Street, Room E418, Indianapolis, Indiana, 46204-2765 and the Clerk of the Circuit Court of the county in which the governmental entity executed the contract or purchase. A copy of this disclosure will be forwarded to the Indiana State Ethics Commission.

SECTION XIII: PROCUREMENT

Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards set forth in 2 CFR 200 establishes standards and guidelines for the procurement of supplies, equipment, construction, and services to ensure that they are obtained as economically as possible through an open and competitive process, and that contracts are managed with good administrative practices and sound business judgment. The regulations include:

- Standards that prohibit conflicts of interest;
- Procedures for open competition with consistent technical solicitations;
- Affirmative efforts to hire minority- and women-owned enterprises;
- Maintenance of selection documentation;
- Contract administration system that provides sufficient monitoring.

The guidelines on procurement are summarized as follows:

- 1) Subrecipients are allowed to use their own procurement procedures as long as those procedures conform to the provisions of the regulations;
- 2) Subrecipients must maintain a system to handle disputes, protests, and other matters arising out of its contracts; maintain a code of conduct to prevent conflicts of interest (personal, financial, and organizational); and use solicitations which are clear and accurately describe the materials, products, or services being procured
- 3) Subrecipients must use some form of cost or price analysis in connection with each of its procurements. They must be able to justify procurements awarded on a non-competitive basis and justify the awarding of procurements by bid on the basis of other than the lowest bid.
- 4) Subrecipients must initiate positive efforts to use small and minority-owned businesses to the maximum extent possible; include all applicable contract provisions in contracts; and not use the cost-plus-percentage of cost contracts.
- 5) If the subrecipient has a parent, affiliate, or subsidiary organization that is not a state, local government, or Indian tribe, the subrecipient must also maintain written standards of conduct covering organizational conflicts of interest. Organizational conflicts of interest means that because of relationships with a parent company, affiliate, or subsidiary organization, the subrecipient is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization.
- 6) The subrecipient's procedures must avoid acquisition of unnecessary or duplicative items. Consideration should be given to consolidating or breaking out procurements to obtain a more economical purchase. Where appropriate, an analysis will be made of lease versus purchase alternatives, and any other appropriate analysis to determine the most economical approach.

SECTION XIV: STANDARDS OF CARE

(This is this the form used for Standard of Care monitoring.)

Standards of Care

Homeless Services Council of Southwestern Indiana

Agency: _____

Evaluation Scores:

4 = *Exceptional adherence to standards of care indicators; Standards of Care met*

3 = *Satisfactory adherence to standards of care indicators; Standards of Care met*

2 = *Most standards of care indicators met, but room for improvement; Standards of Care met with reservations from the Evaluation Committee*

1 = *Standards of Care not met*

Administration, Management and Coordination

All involved organizations follow standard and required administrative and management practices, and coordinate their activities in order to ensure the best outcomes for tenants.

_____ Organization has financial audit performed on a regular basis (usually, once per year)

_____ Organizational and program policies and procedures are reviewed and updated at least annually and include detailed job descriptions of program personnel

_____ Organization allows program audit narrative (conducted by HUD) to be reviewed by the Standards of Care Committee

_____ Overall section score

Physical Environment

The design, appearance, physical integrity and maintenance of the housing units provide an environment that is attractive, sustainable, functional, appropriate for the surrounding community and conducive to tenants' stability.

_____ Facility has a reasonable "home-like" appearance both physically and environmentally—residential appearance both internally and externally; scale, appearance, design and quality are consistent with the neighborhood and meet (or exceed) community standards

_____ Common spaces are clean and orderly, and adequate for the number of residents

_____ The building's safety and security features are up to code and adequate for the facilities needs

_____ Residences/rooms/sleeping quarters meet Housing Quality Standards

_____ Overall section score

Access to Housing Services

Initial and continued access to the housing opportunities and supportive services is not restricted by unnecessary criteria, rules, service requirements or other barriers.

_____ Organization is located near a bus route (within .5 miles of facility)

_____ Program has adopted the "Housing First" philosophy of care, thereby reducing barriers to program entry indicated by an average time from application to placement of 21 or less days

_____ Organization has adequate access to program service linkages (involvement on HSC and relevant committees)

_____ Overall section score

Supportive Services Design and Delivery

The design and delivery of supportive services facilitate access to a comprehensive array of

services, are tenant-focused, effectively address tenants' needs and foster tenants' housing stability and independence.

_____ Organization offers comprehensive services or provides referrals to wrap-around services for clientele

_____ Organization abides by tenant-driven services philosophy

_____ Organization has adequate staffing and receive appropriate supervision

_____ Staff and supervisors have access to service partners and linkages to care

_____ Overall section score

Property and Asset Management

Property management activities support the mission and goals of the housing, and foster tenants' housing stability and independence, and appropriate asset management strategies sustain the physical and financial viability of the housing asset.

_____ Property management staff has a collaborative relationship with supportive services (whether internal or external) and is aware of the policies and philosophy of the service staff

_____ Property management staff effectively communicates with tenants/clients

_____ Property management staff keeps residences in compliance with Fair Housing Standards

_____ Overall section score

Client/Tenant Rights, Input and Leadership

Tenant rights are protected within consistently-enforced policies and procedures, tenants are provided with meaningful input and leadership opportunities and staff-tenant relationships are characterized by respect and trust.

_____ Leases are current and kept in clients' confidential file; policies/rules are posted in a conspicuous place

_____ Organization has a grievance procedure and that procedure is posted in a conspicuous place; staff is aware of the policy

_____ Organization has a confidentiality procedure and that procedure is posted in a conspicuous place; staff is aware of the policy

_____ Organization's policies center around providing client-driven services, meaning that clients are provided opportunities for education, input and feedback regarding services rendered

_____ Client sensitivity training is available and implemented with all staff and volunteers

_____ Overall section score

Data, Documentation and Evaluation

All involved organizations reliably capture accurate and meaningful data regarding the effectiveness, efficiency and outcomes of their activities and use this data to facilitate and improve the performance of those activities on an ongoing basis.

_____ Organization provides monthly updates to Standards of Care Committee Co-Chairs on or prior to the due date (15th of the month)

_____ Organization allows for the development and training of program staff

_____ Organization has a representative involved in at least once HSC committee

_____ Client input is utilized in a useful way and feedback is provided to tenants in a timely manner

_____ Utilization of HMIS or equivalent database (grade based on intensity of use)

_____ Most recent Data Quality Report Card grade

_____ Overall section score

SWOT Analysis of Agency

Strengths: Weaknesses/Limitations:

Opportunities: Threats:

Comments:

Courtesy of Siebert Consultants:

SWOT Analysis

To move from where you are today to where you want to go, you have to determine your strategic position. The SWOT (Strengths, Weaknesses, Opportunities, and Threats) analysis helps you look critically at your organization. The four quadrants of the SWOT define your strategic position right now. Later we will use this information to guide the objectives and goals in your strategic plan.

SWOT Analysis is a powerful technique for understanding your Strengths and Weaknesses, and for looking at the Opportunities and Threats you face.

How to Use this Tool

To carry out the SWOT Analysis, see the attached worksheet, and write down answers to the following questions in each area.

INTERNAL ASSESMENT

Strengths: The internal assessment examines strengths that exist within your organization. Strengths encompass everything your organization does well. This includes capabilities, skills, and resources you can leverage and draw upon to execute plans and actions within your organization. Strengths are only meaningful when they assist an organization in meeting customer/constituent needs.

- What advantages does your Organization have?
- What assets or resources do we have?
- What would Clients say are our strengths?
- What do you do better than anyone else?
- What unique or lowest-cost resources do you have access to?
- What do people in your market see as your strengths?
- What factors mean that you "have clients seek your services?"

Consider this from an internal perspective, and from the point of view of your Clients in your market. And be realistic: It's far too easy to fall prey to "not invented here syndrome". Also, if you are having any difficulty with this, try writing down a list of your characteristics. Some of these will hopefully be strengths!

In looking at your strengths, think about them in relation to your competitors – for example, if all your competitors provide high quality services, then a high quality services is not strength in the market, it is a necessity.

Weaknesses: The internal assessment examines weaknesses that exist within your organization. A weakness is something your organization lacks or does poorly in comparison to others, or a condition that puts it at a disadvantage. Weaknesses encompass everything that is holding your organization back from achieving your goals or serving your Clients/Constituents.

- What could you improve?

- What should you avoid?
- What are people in your market likely to see as weaknesses?
- What factors cause potential clients to go elsewhere?

Again, consider this from an internal and external basis: Do other people seem to perceive weaknesses that you do not see? Are your competitors doing any better than you? It is best to be realistic now, and face any unpleasant truths as soon as possible.

Again use the worksheet, and write down answers to the above questions relating to Weaknesses.

EXTERNAL ASSESMENTS

Opportunities The external assessment examines opportunities that exist in your area. Opportunities are situations that exist but must be acted on if your organization is to benefit from them. Opportunities most relevant to your organization are those that offer important avenues for growth, have the most potential for competitive development, and those that match up well with the financial and resource capabilities that your organization already possesses or can acquire.

- Where are the good opportunities facing you?
- What are the interesting trends you are aware of?

Useful opportunities can come from such things as:

- Changes in technology and markets on both a broad and narrow scale
- Changes in government policy related to your field
- Changes in social patterns, population profiles, lifestyle changes, etc.
- Local Events

A useful approach to looking at opportunities is to look at your strengths and ask yourself whether these open up any opportunities. Alternatively, look at your weaknesses and ask yourself whether you could open up opportunities by eliminating them.

Again use the worksheet, and write down answers to the above questions relating to Opportunities.

Threats: The external assessment examines threats that exist in the marketplace. Threats exist independent from your organization. Threats refer to external conditions or barriers that may prevent your organization from reaching its objectives. Your organization should recognize these threats and try to minimize them.

- What obstacles do you face?
- What is your competition doing?
- Are the requirements for your services changing?
- Is changing technology threatening your position?
- Do you have bad debt or cash-flow problems?
- Could any of your weaknesses seriously threaten your organization?

Again use the worksheet, and write down answers to the above questions relating to Threats.

SWOT Analysis is a simple but powerful framework for analyzing your Organization's Strengths and Weaknesses, and the Opportunities and Threats you face. This helps you to focus on your strengths, minimize threats, and take the greatest possible advantage of opportunities available to you.

Carrying out this analysis will often be illuminating – both in terms of pointing out what needs to be done, and in putting problems into perspective.

SECTION XV: DEFINITIONS, REFERENCE RESOURCES

<http://www.in.gov/ihcda/>

Indiana Housing & Community Development Authority

<http://www.hudhre.info/index.cfm?do=viewResource&ResourceID=4517>

ESG Program Interim Regulations

<http://www.access.gpo.gov/nara/cfr/cfr-table-search.html>

Code of Federal Regulations

<http://www.indianahousingoptions.org/home.asp>

Indiana Housing Opportunity Planner & Evaluator

<http://www.endhomelessness.org>

National Alliance to End Homelessness

<http://www.hud.gov/offices/fheo/index.cfm>

HUD Fair Housing Equal Opportunity Link

<http://www.indianahousingnow.org>

Indiana Housing Now Search Engine

<http://www.hud.gov/offices/fheo/promotingfh/928-1.pdf>

Equal Housing Opportunity/ Fair Housing Poster

<http://www.huduser.org/portal/datasets/fmr.html>

HUD Fair Market Rents. *Published every October*

<http://www.gosection8.com/>

GoSection8 site for Rent Reasonable requirement

Emergency Solutions Grant's Code of Federal Domestic Assistance (CFDA) Number: 14.231