

Attachment #3

**Tampa/Hillsborough County Continuum of Care
Hillsborough County BOCC Emergency Solutions Grant Program
Policies and Procedures**

**Prepared by
Tampa Hillsborough Homeless Initiative February 27, 2015**

REVISE: February 9, 2017

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with effective date to be same as the revision date of February 9, 2017*

Revision Tracking

February 9, 2017 revisions:

- **Revises 3.4.2 Eligibility for Rapid Re-Housing**, changing the eligibility recertification timeframe for rapid rehousing to at least annually to align with the ESG Interim Rule (24 CFR_576).
- **Revises 5.1 Financial Assistance** to align with 24 576.105 (c) to allow ESG funded projects to “set maximum dollar amounts that the project participant may receive for each type of financial assistance under paragraph (a)” of 24 CFR 576.105. The project “may also set a maximum period for which a project participant may receive any of the type of assistance” under section 24 CFR 105” so long as it does not exceed limits set forth in 24 CFR.
- **Revises 5.1.5.5 Participant Share in the Cost and 6.2.6 Participant Share of Cost** to align 24 CFR 576.106 (4) (b) that allows for ESG projects the discretion to set caps and conditions to short- and medium-term rental assistance. “

**Tampa/Hillsborough County Continuum of Care
Emergency Solutions Grant Program
Policies and Procedures**

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Attachments

- Attachment A** At Risk of Homelessness and Homeless Definition

- Attachment B** Documentation Requirements of Homeless Prevention Eligibility

- Attachment C** Requirements for Documentation of Housing Status

- Attachment D** Income Inclusions & Exclusions

- Attachment E** Requirements for Documentation of Income Verification

- Attachment F** Housing Options/Resources Eligibility Documentation Standards

**Tampa/Hillsborough County Continuum of Care
Emergency Solutions Grant Program
Policies and Procedures**

1. Introduction

This is the second revision of the manual developed for the Tampa / Hillsborough County Continuum of Care (CoC) to assist in the implementation of the Emergency Solutions Grants Program as authorized by the Homeless Emergency and Rapid Transition to Housing Act of 2009 (HEARTH Act), hereafter referred to as “HESG”. It is to be used as a reference by the recipients of the HESG and other agencies providing services under a subrecipient agreement. This manual does not replace any federal regulations including the HESG Rule published by the Department of Housing and Urban Development (HUD) in the Federal Register on December 5, 2011.

This manual is designed to promote standardization and provide direction in regard to local policy. This manual further clarifies additional requirements of HESG recipients and subrecipients as authorized by HEARTH and developed by HUD including the Homeless Management Information System (HMIS) Requirements published December 9, 2011, the Continuum of Care Program Rule published in the Federal Register on July 31, 2012, and the Definition of Homelessness and Reporting published in the Federal Register on December 5, 2011. From time to time there may be amendments or policy clarifications as further guidance becomes available.

Questions and comments regarding the material contained in this manual may be referred to the Tampa Hillsborough Homeless Initiative by calling 813-223-6115, or by calling the City of Tampa Housing & Community Development Division at 813-274-7954, or Hillsborough County Affordable Housing Services at 813-612-5397.

2. Overview

Hillsborough County and the City of Tampa are recipients of HESG funds and each is responsible for consulting with the CoC in allocating funds for eligible activities, developing performance standards, evaluating outcomes of HESG-assisted projects, analyzing patterns of use, and developing funding, policies, and procedures for the administration of the HMIS.

The HESG provides funding that may be used to: (1) engage homeless individuals and families living on the street; (2) improve the number and quality of emergency shelters for homeless individuals and families; (3) provide support to operate shelters; (4) provide essential services to shelter residents, (5) rapidly re-house homeless individuals and families, and (6) prevent families and individuals from becoming homeless.

All programs are guided by a philosophy which values participant choice, and promotes respect between and among organizations’ staff and participants. There is an emphasis on diversion to keep persons from entering the homeless system, and rapidly rehousing individuals and families who are experiencing homelessness. The includes implementation of *Housing First*, an approach in which housing is offered to people experiencing homelessness without preconditions (such as sobriety, mental health treatment, or a minimum income threshold) or service participation requirements, and in which rapid placement and stabilization in permanent housing are primary goals. A variety of services delivered to promote housing stability and individual well-being are made available on an as-needed basis. Embracing the concepts of Housing First is a proven approach for ensuring the community is addressing the needs of our most chronic and vulnerable populations.

3. Program Components and Eligible Activities

HESG funds may be used for 5 program components: street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and HMIS; as well as administrative activities. Activities funded must be eligible and participants assisted must meet the appropriate housing status for the services received. (Refer to Attachment A At Risk of Homelessness and Homeless Definitions.)

3.1 Street Outreach includes reaching out to unsheltered homeless individuals and families, connecting them with emergency shelter, housing, or critical services, and providing them with urgent, non-facility-based care. Services must be provided for the period of time HESG funds are committed.

3.1.1 Essential Services for Street Outreach includes engagement, case management, emergency health and mental health services, and transportation. The eligible costs and requirements for essential services for street outreach are summarized below and detailed in §576.101.

3.1.1.1 Engagement. Allows for the costs of activities to locate, identify, and build relationships with unsheltered homeless people and engage them for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs. The cost of the initial assessment, crisis counseling, addressing urgent physical needs, linkage and referral for assistance, and cell phone costs of outreach workers during the performance of these activities are all eligible.

Due diligence should be exercised when conducting outreach to ensure persons identified by the CoC as a high priority are engaged and linked to assistance recognizing some persons—particularly those living on the streets or in places not meant for human habitation—might require significant engagement and contacts prior to their entering housing. Note: recipients are not required to keep units vacant where there are persons who meet a higher priority within the CoC and who have not yet accepted the opportunities offered to them. Street outreach providers should continue to make attempts with those persons using a Housing First approach to place as few conditions on a person's housing as possible.

3.1.1.2 Case Management. The cost of assessing housing and service needs, developing and individualized housing/service plan, verifying and documenting eligibility, arranging, coordinating, and monitoring access to benefits and other services. Eligible costs include using the centralized or coordinated assessment system.

3.1.1.3 Emergency Health Services. Allows for the cost of outpatient treatment of urgent medical conditions provided by licensed medical professionals operating in community-based settings, including streets, parks, and other places where unsheltered homeless people are living to the extent other appropriate health services are inaccessible or unavailable within the area. This includes those eligible participants unwilling or unable to access emergency shelter or appropriate healthcare facility. Eligible costs include assessment, development of treatment plan, assisting participants understand their health needs, providing or helping to obtain appropriate emergency medical treatment and providing medication and follow-up services.

3.1.1.4 Emergency Mental Health Services. Allows for the cost of direct outpatient treatment of urgent mental health conditions by licensed professionals operating in community-based settings, including streets, parks, and other places where unsheltered people are living to the extent other appropriate mental health services are inaccessible or unavailable within the community. This includes those eligible participants unwilling or unable to access emergency shelter or appropriate facility. Eligible costs include crisis intervention, prescription of psychotropic medications, the use and management of medications, and combination of therapeutic approaches to address multiple problems.

3.1.1.5 Transportation. Travel by outreach workers, social workers, medical professionals, or other service providers is eligible, provided travel takes place during the provision of essential services, including mileage reimbursement, cost of purchasing or leasing a vehicle used by staff to serve and/or transport program participants to emergency shelters or other service facilities, cost of gas, insurance, taxes and maintenance for the vehicle.) The costs of program participant’s travel on public transportation and the cost of staff accompanying the participant are also eligible.

3.1.1.6 Services for Special Populations. HESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under paragraphs 3.1.1.1 through 3.1.1.5 of this section.

3.1.2 Eligibility for Street Outreach. Eligible services provided to unsheltered individual or family. Income verification is not required except to the extent the individual or family have no other resources to access housing, shelter, or other essential services. The term “unsheltered homeless people” is defined as – (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, but not limited to, a car, park, abandoned building, bus or train station, airport, or camping ground. Further targeting of outreach will be addressed through the development and implementation of the coordinated assessment system.

3.2 Emergency Shelter. HESG revised the definition of emergency shelter to distinguish this type of shelter from transitional housing. An emergency shelter is any facility in which the primary purpose is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements. Subject to the expenditure limits 576.100(b), HESG funds may be used for costs of providing essential services to homeless families and individuals in emergency shelters, renovating buildings to be used as emergency shelter, and operating emergency shelters. Essential services or shelter operations must be provided for the period of time HESG funds are committed. In the case involving rehabilitation and renovation a recorded deed or use restriction will document the period of time services must be provided. The CoC will established written standards addressing admission, diversion, referral, and discharge by shelters assisted under the HESG, including length of stay, and safeguards to meet the safety and shelter needs of special populations and those individuals and families who have the greatest barriers to housing and likely to be homeless the longest.

3.2.1 Essential Services for Persons in Emergency Shelter includes case management, childcare, education services, employment assistance and job training, outpatient health and mental health services, legal services, life skills training, substance abuse treatment services, and transportation. The eligible costs and requirements for essential services for emergency shelter are summarized below and detailed in §576.102.

3.2.1.1 Case Management. The cost of assessing housing and service needs, developing an individualized housing/service plan, verifying and documenting eligibility, and arranging, coordinating, and monitoring access to benefits and other services. Ongoing risk assessment and safety planning are also eligible.

3.2.1.2 Child Care. The cost of child care is eligible for children under the age of 13, unless they are disabled. Disabled children must be under the age of 18. Costs include child care, meals and snacks, and comprehensive and coordinated sets of appropriate developmental activities. The facility must be licensed.

3.2.1.3 Education Services. The costs of improving knowledge and basic educational skills are eligible when necessary for the program participant to obtain and maintain housing including literacy, English literacy, GED, consumer education, health education, and substance abuse prevention. Costs for tutoring, books, supplies, and instruction are also eligible.

3.2.1.4 Employment and Job Training. The costs of employment assistance and job training programs are eligible, including classroom, online, and/or computer instruction; on-the-job instruction; and services assisting individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of providing reasonable stipends to program participants in employment assistance and job training programs, books and instructional materials, and tutoring are also eligible costs.

3.2.1.5 Outpatient Health Services. Eligible costs are for the direct outpatient treatment of medical conditions provided by licensed medical professionals. This includes the cost of assessment, assisting persons understand their health needs, coordinating access to medical treatment, providing medication and follow-up services, and providing preventive and non-cosmetic dental care. HESG funds may only be used for these services to the extent other appropriate health services are unavailable within the community.

3.2.1.6 Mental Health Services. Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions. The provision of crisis intervention, prescription of psychotropic medications, education on the use and management of medications, and combination of therapeutic approaches to address multiple problems are eligible costs. HESG funds may only be used for these services to the extent other appropriate mental health services are unavailable or inaccessible within the community.

3.2.1.7 Legal Services. Eligible costs are the hourly fees for legal advice and representation by attorneys licensed and in good standing with the Florida bar association, and by person(s) under the supervision of the licensed attorney, regarding matters interfering with the program participant's ability to obtain and retain housing, and certain other fees and court costs. Eligible subject matters are child support, guardianship, paternity, emancipation, legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking, appeal of veterans and public benefit claim denials, and resolution of outstanding criminal warrants. HESG funds may only be used to the extent other appropriate legal services are unavailable or inaccessible within the community. (Refer to 5.24 for additional information on Legal Services.)

3.2.1.8 Life Management Skills. The costs of teaching critical life management skills never learned or lost during the course of physical or mental illness, domestic violence, substance use, and homelessness. Services must be necessary to assist the program participant to function independently in the community and include budgeting, managing money, managing a household, resolving conflict, shopping, nutrition, using public transportation, and parenting.

3.2.1.9 Substance Abuse Treatment Services. Eligible substance abuse treatment services must be designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors and must be provided by licensed or certified professionals. This includes intake and assessment, up to 30 days of outpatient, group and individual counseling, and drug testing. HESG funds may only be used for these services to the extent other appropriate substance abuse treatment services are unavailable or inaccessible within the community.

3.2.1.10 Transportation. The public transportation costs of a program participant's travel to and from medical care, employment, child care, or other eligible essential services and the cost of staff accompanying program participant are eligible. Travel by service workers to visit or transport program participants, including mileage reimbursement, purchasing or leasing a vehicle, gas, insurance, taxes and maintenance for the vehicle are eligible.

3.2.2 Minor/Major Rehabilitation, Conversion, or Renovation. In general, an activity that adds materially to the value of the building, appreciably prolongs its useful life, or adapts it to new uses would be considered renovation

or conversion. Examples of renovation could include: replacing fixtures, such as the HVAC system or plumbing; replacing a roof; etc. Depending on the cost of the renovation and value of the building, it might be considered minor rehabilitation or major rehabilitation

3.2.2.1 Minimum Standards. Any assisted shelter must meet the minimum standards as provided by §576.403 and must serve homeless persons for at least 3 or 10 years, depending on the use of HESG funds provided and building valuation as confirmed by the recipient. (§576.102 (b)). ** A 10-year minimum period of use for major rehabilitation or conversion must be enforced by a recorded deed or use restriction. Note that for renovation and conversion activities, the minimum period of use starts on the date the building is first occupied by homeless individuals or families after the renovation or, if the building is occupied during the renovation, the period of use starts on the date the renovation is completed.

3.2.2.2 Eligible Costs. Eligible costs include labor, materials, tools, and other costs for renovation, including soft costs. Property acquisition and new construction are ineligible.

3.2.3 Emergency Shelter Operations includes the costs of maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for operation, and other emergency lodging when appropriate.

3.2.3.1 Hotel or Motel Voucher. A homeless family or individual may be eligible for a hotel or motel voucher when no other emergency shelter bed is available. A case manager or other authorized personnel must maintain daily contact with the participant while payment is being made for the room or rooms including seeing the participant at the motel when feasible.

3.2.3.2 Transitional Housing (TH) Facilities. The definition of TH has been expanded to distinguish it from emergency shelter. TH means housing, where all program participants have signed a lease or occupancy agreement, the purpose of which is to facilitate the movement of homeless individuals and families into permanent housing within 24 months or such longer period as HUD determines necessary.

TH is eligible to receive HESG funds it must meet both of the following criteria: (1) the primary purpose is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and (2) it does not require occupants to sign leases or occupancy agreements. An exception to this criteria is any facility that received funds under the FY 2010 Emergency Shelter Grants program and met the criteria under the former emergency shelter definition (“any facility, the primary purpose of which is to provide temporary or transitional shelter for the homeless in general or for specific populations of the homeless”). A transitional housing project funded as an emergency shelter under a Fiscal Year 2010 Emergency Shelter grant does not have to have been continuously funded since FY 2010 in order to receive HESG funding in a later fiscal year and may receive funds from more than one HESG recipient provided the subrecipient is not compensated for the same service to the same recipient by both HESG recipients.

3.2.3.3 Prohibition Against Involuntary Family Separation. The age, of a child under age 18 must not be used as a basis for denying any family’s admission to an emergency shelter using HESG funding or services and provides shelter to families with children under age 18.

3.2.3.4 Services to Special Populations. HESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs are eligible.

3.2.3.5 Maintenance. In general, maintenance activities do not materially add to the value of the building/property; do not appreciably prolong the useful life of the building/property; and do not adapt the building/property to new uses. Costs include: cleaning; minor or routine repairs of furnishings, equipment, and fixtures; and protective or preventative measures to keep a building, its systems, and its

grounds in working order. Examples of maintenance activities could include activities such as: replacing a few shingles on a leaky roof; patching leaking pipes or plumbing; replacing a broken window; fixing a crack in a sidewalk; filling potholes in a parking lot; and repairing portions of a fence.

- **Minimum period of use:** The minimum period of use for maintenance activities is the same as for other shelter operations and essential services activities—that is, the recipient/subrecipient must provide services or shelter to homeless individuals and families at least for the period during which the HESG funds are provided (for example, the contract period specified in a subrecipient agreement) (see § 576.102(c)(2)).
- **Level of environmental review required:** Maintenance activities are Categorically Excluded, Not Subject to §58.5 (CENST), meaning that maintenance is categorically excluded from National Environmental Policy Act (NEPA), and not subject to § 58.5, but still subject to § 58.6 (see § 58.35(b)(3)).

3.2.4 Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA). URA assistance under § 576.408 is eligible, including relocation payments and other assistance to persons displaced by a project assisted with HESG funds. Persons receiving URA assistance are not considered “program participants” for the purposes of this part, and relocation payments and other URA assistance are not considered “rental assistance” or “housing relocation and stabilization services” for the purposes of this part.

3.2.5 Day Shelter. HESG funds can be used for day shelters targeting people who are sleeping on the streets or in emergency shelter, and meet the criteria under the emergency shelter definition in section § 576.2.

3.2.5.1 Standards for a Day Shelter. To be considered an eligible day shelter, at a minimum, homeless people must be able to stay in the facility for as many hours as it is open, each person accessing the day shelter must receive a face-to-face evaluation consistent with HESG Policy and Procedures, client and activity data must be entered into the local HMIS, and the facility will comply with standards established by the CoC addressing admission, diversion, referral, discharge, and safeguards to meet the safety and shelter needs of special populations.

3.2.5.2 Other Services for Day Shelter Participants. The costs of services such as case management and mental health services provided to homeless persons in the day shelter would be eligible under essential services, and laundry facilities or meals in the day shelter would be eligible under shelter operations, as long as the costs comply with program requirements (24 CFR § 576.100(d) and § 576.102).

3.2.6 Eligibility for Emergency Shelter. To the extent practicable, projects will prioritize individuals and families who have an identified prior residence as living in places not designed for, or not ordinarily used as, a regular sleeping accommodation including a car, a park, an abandoned building, a bus or train station, an airport, or a campground. Income verification is not required for Emergency Shelter, except to the extent the individual or family have no other resources to access housing, shelter, or other essential services. Reasonable efforts must be made to divert households from entering emergency shelter. The intent is to catch people who are losing housing before they enter the homeless system. If homeless persons have contacted emergency shelters the subrecipient must consider alternative programs such as prevention assistance so that they remain in existing housing, move to other permanent housing, or are connected quickly to permanent housing.

3.2.7 Minimum Standards for Emergency Shelter. Any emergency shelter that receives HESG assistance for shelter operations must meet the following minimum safety, sanitation, and privacy standards. Grantees may also establish standards that exceed or add to these minimum standards.

3.2.7.1 Structure and materials. The shelter building must be structurally sound to protect residents from the elements and not pose any threat to health and safety of the residents.

3.2.7.2 Access. The shelter must be accessible in accordance with Section 504 of the Rehabilitation Act (29 U.S.C. 794) and implementing regulations at 24 CFR part 8; the Fair Housing Act (42 U.S.C. 3601 et seq.) and implementing regulations at 24 CFR part 100; and Title II of the Americans with Disabilities Act (42 U.S.C. 12131 et seq.) and 28 CFR part 35; where applicable.

3.2.7.3 Space and security. Except where the shelter is intended for day use only, the shelter must provide each program participant in the shelter with an acceptable place to sleep and adequate space and security for themselves and their belongings.

3.2.7.4 Interior air quality. Each room or space within the shelter must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.

3.2.7.5 Water supply. The shelter's water supply must be free of contamination.

3.2.7.6 Sanitary facilities. Each program participant in the shelter must have access to sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.

3.2.7.7 Thermal environment. The shelter must have any necessary heating/ cooling facilities in proper operating condition.

3.2.7.8 Illumination and electricity. The shelter must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the shelter.

3.2.7.9 Food preparation Food preparation areas, if any, must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.

3.2.7.10 Sanitary conditions. The shelter must be maintained in a sanitary condition.

3.2.7.11 Fire safety. There must be at least one working smoke detector in each occupied unit of the shelter. Where possible, smoke detectors must be located near sleeping areas. The fire alarm system must be designed for hearing impaired residents. All public areas of the shelter must have at least one working smoke detector. There must also be a second means of exiting the building in the event of fire or other emergency.

3.3 Homeless Prevention. The provision of housing relocation and stabilization services and rental assistance is used as part of diversion efforts to prevent the individual or family from moving into an emergency shelter or becoming literally homeless, as defined by HUD. The purpose of the HESG prevention assistance is to stabilize a housing crisis and not to provide long-term support. Prevention is most efficiently implemented when targeted to those at greatest risk of losing housing. Enrollment in a prevention program should typically last around 2-6 months, although enrollments can be longer, and rely heavily on a case management plan to ensure long term stability for program participants.

3.3.1 Eligible Costs for Homeless Prevention include financial assistance, services, and rental assistance.

3.3.1.1 Financial Assistance includes rental application fees, security deposits, last month's rent, utility deposits and payments, moving costs, and the expense incurred for completing required inspections of occupied housing units and housing selected when the household must relocate.

3.3.1.2 Service Costs includes housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, and credit repair. Use of HESG funds to support case management and other services may be provided independent of rental assistance and/or to support program participants accessing rental assistance through other resources. **Program participants are required to meet with a case manager not less than once per month and develop a housing stability plan to support housing retention after the HESG assistance ends.**

3.3.1.3 Rental Assistance includes short-term, up to 3 months, medium-term, more than 3 months up to 24 months, and a one-time payment of rental arrears, up to 6 months including late fees on the arrears. (Legal costs included in the arrears are eligible under Financial Assistance.) Access to rental assistance requires participation in case management.

3.3.2 Eligibility for Homelessness Prevention. Prevention assistance may be provided to individuals and families who are at imminent risk, or at risk of moving into an emergency shelter or place not meant for habitation and have an annual income below 30% Area Median Income (AMI) for the Tampa–St. Petersburg–Clearwater Metropolitan Statistical Area as determined by HUD for the most current year. (Categories 2 and 3 of the Homeless Definition, and 4 when not living in a place described in Category 1, or those who qualify as Category 1, 2 or 3 of the At Risk of Homelessness Definition as provided for under the HEARTH ACT.) Eligibility requires an initial face-to-face interview and recertification every three months assistance is to be provided.

3.3.2.1 Prioritizing Households for Prevention Assistance. The program will focus on helping individuals and families overcome their immediate housing obstacles and connect them with the resources they need to stay housed when the program ends. Eligible families and individuals will be prioritized for prevention assistance based on standards established by the CoC.

3.4 Rapid Re-Housing. The provision of housing relocation and stabilization services and rental assistance, as necessary and as quickly as possible, to help a homeless individual or family move into and achieve stability in permanent housing. The program focuses on helping individuals and families overcome their immediate housing obstacles by connecting them with the resources needed to remain stably housed when the program ends. Enrollment in a rapid re-housing program should rely heavily on a case management plan to ensure long term stability for program participants. Providers are expected to implement a case management plan that will increase household incomes and/or increase access to mainstream benefits for program participants. Linkages should also be made to applicable mainstream programs such as SOAR, food stamps, TANF, etc.

3.4.1 Eligible Costs for Rapid Re-Housing include financial assistance, services, and rental assistance.

3.4.1.1 Financial Assistance includes rental application fees, security deposits, last month's rent, utility deposits and payments, moving costs, and the expense incurred for completing required inspections of housing units.

3.4.1.2 Service Costs includes housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, and credit repair. Use of HESG funds to support case management and other services may be provided independent of rental assistance and/or to support program participants accessing rental assistance through other resources. Program participants are required to meet with a case manager not less than once per month and develop a housing stability plan to support housing retention after the HESG assistance ends.

3.4.1.3 Rental Assistance includes short-term, up to 3 months, medium-term, more than 3 months and up to 24 months, and a one-time payment of rental arrears, up to 6 months including late fees on the arrears. Access to rental assistance requires participation in case management.

3.4.2 Eligibility for Rapid Re-Housing is only available to individuals and families who meet the definition of being literally homeless (Category 1 or 4 under the Homeless Definition Final Rule). Eligibility requires an initial face-to-face interview and an eligibility recertification annually. At project entry, there is no income minimum or maximum. At annual recertification, household income may not exceed 30 percent of AMI.

3.4.2.1 Prioritizing Households for Rapid Re-Housing. Eligible families and individuals will be prioritized based on standards established by the CoC.

3.4.2.2 Eligibility for Other Housing Program. Program participants receiving rapid re-housing through HESG maintain their homeless status for the purpose of eligibility for other permanent housing programs, such as HUD-VASH and CoC-funded permanent supportive housing (so long as they meet any other additional eligibility criteria for these programs). Program participants only maintain their homeless status during the time period they are receiving HESG funded rapid re-housing.

3.5 Homeless Management Information System (HMIS) is an electronic data collection system administered by the HMIS Lead, which stores longitudinal client-level information about persons who access the homeless services system in a CoC. UNITY Information Network (UNITY) is the existing HMIS for the Tampa/Hillsborough County CoC, administered by the Homeless Coalition of Hillsborough County, Inc. UNITY utilizes Bowman's ServicePoint to collect client-level data, such as the number of persons served and their demographic information, as a tool to coordinate access to services, and to produce reports and monitor program outcomes. Participation in UNITY is required unless an organization qualifies for an exemption. Reasonable and appropriate costs associated with operating HMIS, or a comparable database, are allowable expenses.

3.5.1 Eligible HMIS Costs. The recipient or subrecipient may use HESG funds to pay the costs of contributing data to the HMIS designated by the CoC, including:

- a. Purchasing or leasing computer hardware
- b. Purchasing software or software licenses
- c. Purchasing or leasing equipment, including telephones, fax machines, and furniture
- d. Obtaining technical support
- e. Leasing office space
- f. Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS
- g. Paying salaries for operating HMIS, including completing data entry, monitoring and reviewing data quality, completing data analysis, reporting to the HMIS Lead, training staff on using the HMIS or comparable database, and implementing and complying with HMIS requirement
- h. Paying costs of staff to travel to and attend HUD-sponsored and HUD approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act
- i. Paying staff travel costs to conduct intake
- j. Paying participation fees charged by the HMIS Lead, if the recipient or subrecipient is not the HMIS Lead

3.5.2 Eligible HMIS Lead Agency Costs. Once the HMIS Rule and Requirements published by HUD are final, eligible costs that may be incurred by the HMIS Lead include:

- a. Hosting and maintaining HMIS software or data
- b. Backing up, recovering, or repairing HMIS software or data
- c. Upgrading, customizing, and enhancing the HMIS
- d. Integrating and warehousing data, including development of a data warehouse for use in aggregating data from subrecipients using multiple software systems
- e. Administering the system

- f. Reporting to providers, the CoC, and HUD
- g. Conducting training on using the system or comparable database, including travel to the training
- h. If the subrecipient is a victim services provider or a legal services provider, HESG funds may be used to establish and operate a comparable database to comply with 24 CFR part 580.

3.5.3 Responsibility for Data Collection. The recipient and any subrecipient are responsible for collecting and entering the required data elements for anyone receiving services as part of the HESG including those assisted with HESG funds and program participants served with funds used to match the program.

3.5.3.1 Frequency of Data Collection. All services provided must be recorded in HMIS within the time period established by the CoC to effectively coordinate assistance and prevent duplication of services.

3.5.3.2 Licensure. Each person required to enter data must be assigned a unique user license.

3.5.4 Required Agreements for HMIS. Recipients and subrecipients must enter into an Interagency Agreement with the HMIS Lead Agency and complete UNITY Release of Information forms to facilitate sharing of information within the CoC.

3.5.4.1 Exemptions. With the approval of the HMIS Lead Agency the following organizations may be permitted to utilize a comparable client-level database and would not be required to share identifying data but would still be required to provide aggregate data:

- Organizations who will integrate data periodically from a long-standing, client-level legacy data collection system meeting the requirements established in the HMIS Data and Technical Standards with HMIS.
- Domestic violence provider (e.g. organization's primary mission is serving victims of domestic violence/sexual assault/date rape/stalking) or legal services provider who require client-level information to remain confidential.

3.5.5 HMIS Training Requirements. Each person entering data into HMIS must participate in the required training and demonstrate knowledge of the UNITY Standard Operating Procedures and competence in using the system. Users are required to complete recertification annually. Training will be provided by the HMIS Lead Agency, in accordance with the HMIS Data and Technical Standards issued by HUD along with any other mandates.

3.5.5.1 UNITY Users Group. Persons using the system are encouraged but not required to participate in UNITY user group meetings.

3.5.5.2 UNITY Advisory Group. A representative of the recipient and any subrecipients are encouraged to participate in UNITY Advisory Group meetings.

3.5.6 HMIS Reporting. Monthly reports will be used to analyze the data quality and completeness of the information being entered into the system. The HMIS Lead Agency will produce reports of those assisted and the services received, and other reports as requested by HUD, the recipients, and the CoC.

3.6 HESG Administration. Up to 7.5 % of a recipient's allocation can be used for general management, oversight, coordination, and reporting on the program. Program administration assignments include the following:

- a. Preparing program budgets and schedules, and amendments to those budgets and schedules
- b. Developing systems for assuring compliance with program requirements
- c. Developing interagency agreements and agreements with subrecipients and contractors to carry out program activities
- d. Monitoring program activities for progress and compliance with program requirements

- e. Preparing reports and other documents directly related to the program for submission to HUD
- f. Coordinating the resolution of audit and monitoring findings
- g. Evaluating program results against stated objectives
- h. Managing or supervising persons engaged in the completion of administrative activities

3.6.1 Eligible Costs for HESG Administration. Those costs associated with overall program management, accounting for the use of grant funds, and preparing reports for submission to HUD. These costs include, but are not limited to, necessary expenditures for the following:

- a. Salaries, wages, and related costs of the recipient's staff, the staff of subrecipients, or other staff engaged in program administration.
- b. Travel costs incurred for monitoring of subrecipients and to attend HUD sponsored HESG trainings
- c. Administrative services performed under third-party contracts or agreements, including general legal services, accounting services, and audit services
- d. Other costs for goods and services required for administration of the program, including rental or purchase of equipment, insurance, utilities, office supplies, and rental and maintenance of office space
- e. Training for staff who will administer the program or case managers who will serve program participants, as long as this training is directly related to learning about HESG
- f. Costs of preparing and amending the HESG and homelessness-related sections of the consolidated plan in accordance with HESG requirements and 24 CFR part 91.
- g. Costs of carrying out the environmental review responsibilities under § 576.407.

3.6.1.1 Cost Allocation. In charging costs to Administration, the recipient or subrecipient may either include the entire salary, wages, and related costs allocable to the program of each person whose primary responsibilities with regard to the program involve program administration assignments, or the pro rata share of the salary, wages, and related costs of each person whose job includes any program administration assignments.

3.6.1.2 Sharing Requirement. The City of Tampa as a metropolitan city and Hillsborough County as an urban county, may share its funds for administrative costs with its subrecipients.

3.6.2 Ineligible Administrative Costs. Administrative costs do not include the costs of issuing financial assistance, providing housing relocation and stabilization services, or carrying out eligible data collection and evaluation activities. Costs incurred under these categories, such as staff salaries, conducting housing inspections, and other operating costs should be included under other eligible activity categories.

3.7 Indirect Costs. HESG grant funds may be used to pay indirect costs in accordance with OMB Circular A-87 (2 CFR part 225), or A-122 (2 CFR part 230), as applicable. Indirect costs may be allocated to each eligible activity under § 576.101 through § 576.108, so long as the allocation is consistent with an indirect cost rate proposal developed in accordance with OMB Circular A-87 (2 CFR part 225), or A-122 (2 CFR part 230), as applicable. The indirect costs charged to an activity subject to an expenditure limit under § 576.100 must be added to the direct costs charged for the activity when determining the total costs subject to the expenditure limit.

4.0 Evaluation of Program Participant Eligibility and Needs

4.1 Initial Evaluation. Every individual and family who seeks assistance must be evaluated face-to-face by a qualified case manager or other authorized staff. The information gathered during this interview is used to minimally assess housing status and the risk of homelessness, as well as the immediate barriers to stable housing for people who are homeless or at high risk of becoming homeless, verify eligibility for the HESG and other community resources, and help determine the projected amount, type, intensity and duration of assistance that the individual or family need to regain stability in permanent housing. These evaluations must be conducted in

accordance with the written standards established by the CoC.

4.1.1 Universal Intake. Persons authorized to complete the initial evaluation must complete the HMIS Universal Intake Assessment for each adult member of the household and the HMIS Universal Intake Assessment for Children for each child in the household. The assessment will be entered into UNITY within 1 business day of the interview. This includes an evaluation of the household's stability using at least the following dimensions of the Self Sufficiency Outcomes Matrix : Shelter/Housing, Employment and Income or Service Prioritization Decision Assistance Tool.

4.1.1.1 Collateral Contacts. Information for completion of the assessment is obtained through interview with the program participant, and with consent, other household members, the referral source, family and friends as appropriate, other agencies currently assisting the household or which have provided services in the past, employers and other entities. Contact with the school social worker is recommended for households with school-age children. Refusing permission to speak with other household members of families without cause may be reason for denial or termination of assistance.

4.1.2 Program Information. During the initial interview the household will be informed of the eligibility requirements, services available, and the household responsibilities, including required contact with program staff, active participation in a plan for housing stability, the recertification process, and of their right to due process if they believe they have been treated unfairly or adversely impacted by any decision. A Participation Agreement has been developed to meet this requirement.

4.1.3 Participant Eligibility. The household must demonstrate a lack of resources, including assets and support networks to maintain or acquire permanent housing. An individual or family's ability to sustain housing is not a threshold requirement.

4.1.3.1 Requirements Specific to Homeless Prevention - The household income, current and expected, of all persons residing at the address must be verified and the interviewer must explore any other resources, including assets and support networks available to prevent the household from moving into an emergency shelter or other places as described in Category 1 of the HUD's homeless definition. The CoC has the authority to establish additional prioritization for prevention assistance.

4.1.3.2 Requirements Specific to Rapid Re-Housing- There is no income threshold at initial evaluation; however the interviewer must explore any other resources, including assets and support networks available to assist the household in ending its homelessness. In addition, the individual or family must demonstrate the need for Rapid Re-Housing based on the VI-SPDAT Score. Individuals and families scoring out of range may be considered with justification in accordance with the standards for the Coordinated Intake and Assessment System. The CoC has the authority to establish additional prioritization for rapid re-housing.

4.1.4 Disposition of the Initial Interview. The case manager or authorized staff completing the face-to-face interview and his or her supervisor must certify eligibility. Households will be informed of the type and amount of assistance approved, and reminded of their responsibilities.

4.1.4.1 Ineligible Households. All households determined ineligible must be referred to alternative resources for assistance. Minimally there must be a log of all households screened including their disposition. HMIS will be used to record and report this information as appropriate.

4.1.4.2 Required Notice of Changes. Program participants receiving homelessness prevention or rapid re-housing assistance are required to notify the recipient or subrecipient in writing regarding changes in household composition but not changes in income. Increased income will be addressed when the

household is being re-evaluated. Households may notify the recipient or subrecipient of a decrease in the household income, which will be processed effective on the date of notice as long as adequate and complete documentation is provided. Changes in household composition will be addressed upon notice and household eligibility must be verified.

4.1.5 Coordinated Intake and Assessment System (CI&A). The CI&A System developed for the Tampa/Hillsborough County CoC is designed to create a single process that will match people experiencing a housing crisis to the appropriate level of assistance without unnecessary delay. This includes addressing the immediate crisis of where someone or family will sleep that night and what assistance is needed to regain stability in permanent housing. Access points are identified to assist the individual or family make the connection with the most appropriate resource.

4.1.5.1 Prevention/Diversion. The CI&A System places an emphasis on prevention and diversion, to keep persons from entering the homeless system. A Prevention/Diversion Assessment is documented to demonstrate the availability or lack of alternative housing options, including those options that would still require some level of assistance. For those who lack an alternative housing option, assistance is provided in accessing emergency/interim housing.

4.1.5.2 Common Assessment Tool. The VI-SPDAT will be used to match those households unable to resolve their own homelessness with an appropriate intervention including transitional housing, rapid rehousing, market housing or permanent supportive housing.

4.1.5.3 Homeless Prevention Assistance. Households who are at risk including imminent risk who are able to remain in their housing may be considered for prevention assistance based on the prioritization established by the CoC and adopted by the recipient.

4.1.5.4 Rapid Rehousing. Households assisted through rapid rehousing must be prioritized using the VI-SPDAT. Recipients and subrecipients will receive referrals or can access referrals from a centralized wait list.

4.1.5.5 Access to Permanent Supportive Housing. Households requiring ongoing supportive services, beyond the array of services and limitations of the HESG program may be eligible for PSH. Access to PSH is based on the community standards that address prioritization for this level of assistance.

4.2 Verification of Housing Status. The recipient or subrecipient must evaluate and document the housing status for each household screened to verify eligibility with the requirements for prevention assistance and rapid rehousing. Evidence relied upon to establish and verify homeless status must be maintained in the case file.

4.2.1 Homeless Prevention. Refer to Attachment B, Documentation Requirements of Homeless Prevention. A household that meets the criteria of Homeless Definition Category 4, Fleeing or Attempting to Flee Domestic Violence not residing in one of the locations defined by Category 1 of the Homeless Definition may be considered for Homeless Prevention.

4.2.2 Rapid Rehousing. Refer to Attachment C, Documentation Requirements of Homeless Status.

4.2.2.1 Certification of Homelessness - Living in a place not meant for human habitation. The certifying agency must be recognized by the Tampa Hillsborough County CoC as an agency that has a program designed to serve persons living on the street or other places not meant for human habitation. (Examples may be street outreach workers, day shelters, soup kitchens, Health Care for the Homeless sites, etc.)

4.2.2.2 Certification of Homelessness -Emergency Shelter and Transitional Housing. The emergency

shelter must appear on the CoC's Housing Inventory Chart submitted as part of the most recent CoC Homeless Assistance application to HUD or otherwise be recognized by the CoC as part of the CoC inventory (e.g. newly established Emergency Shelter).

4.3 Verification of Income Eligibility. During the initial interview and the re-evaluation process the case manager or authorized staff must document the annual income of all household members, and other supports available to the family. If 2 or more unrelated individuals are joint parties to a lease, a grantee must consider total household income to determine eligibility (i.e., either the whole household is eligible for assistance, or the whole household is not). Verification of the household income and assets must be maintained in the case file.

4.3.1 Annual Income. Income is money received by, or on behalf of, the family head or spouse (even if temporarily absent) or any other family member. Annual income includes the current gross income, the amount of income earned before any deductions, such as taxes, and health insurance premiums, other income received through other sources, and assets, such as the interest on a savings or checking account even if the household elects not to receive it. The interest for any asset is included in the income, and must be taken into account in determining if the household has access to resources to prevent or end their homelessness.

Only the income the household is currently receiving at the time of application for assistance or known income to be received during the period of assistance is considered. Income recently terminated should not be included. Refer to Attachment D, Income Inclusions & Exclusions for determining annual income.

4.3.2 Calculating Income. When calculating income based on hourly, weekly or monthly payment information, add the gross amount for each payment period documented and divide by the number of payment periods. This provides an average wage per payment period. The following calculations convert the average wage into annual income based on the pay period or the schedule of periodic payments:

- a. Hourly Wage multiplied by Hours Worked Per Week multiplied by 52 weeks
- b. Weekly Wage multiplied by 52 weeks
- c. Bi-Weekly (every other week) Wage multiplied by 26 bi-weekly periods
- d. Semi-Monthly Wage (twice a month) multiplied by 24 semi-monthly periods
- e. Monthly Wage multiplied by 12 months

4.3.3 Assets. Assets are cash or material items that can be converted to cash quickly. They include both real and/or personal property and investments that a household may possess, including assets that are owned by more than one person, but allow unrestricted access to the applicant. The maximum amount of liquid assets per household is \$1,000. All assets must be utilized before financial or rental assistance can be provided. This includes either spending the funds for housing or other necessary living expenses or demonstrating how the funds are to be utilized to support long-term housing stability. Any lump sum/one-time payments are treated as assets.

4.3.3.1 Examples of Assets. Assets include: 1. Amounts in checking and saving bank accounts. 2. Stocks, bonds, savings certificates, money market funds, and other investment accounts. 3. The cash value of trusts that may be withdrawn by the household. 4. IRA, Keogh and similar retirement savings accounts, even when early withdrawal will result in a penalty. 5. Lump sum receipts of cash received and accessible by household, such as inheritances, capital gains, lottery winnings, insurance settlements, and other claims.

4.4 Re-Evaluation for Prevention Assistance and Rapid Re-Housing. Reassessment of eligibility is required at least every 3 months to evaluate continued need for assistance. A face-to-face interview is required and includes verification of current income and demonstration that without the assistance the household would become homeless. In order to prevent any delay in assistance it is recommended this process be completed by the 15th of the third month of assistance.

4.4.1 Verification of Income and Other Resources. At re-evaluation, the case manager must recalculate and document household income the same as during the original assessment except that both prevention assistance and rapid re-housing must be below 30% AMI. The household must continue to demonstrate lack of sufficient resources and/or support networks to retain housing without HESG assistance. Income includes what the household is receiving at the time of recertification or expected during the period of assistance. Income recently terminated should not be included.

4.4.2 Progress Update. The case manager must evaluate a participant's progress from the initial case management consultation to determine (and document) ongoing barriers to stable housing. Re-evaluation will require a report of the household's progress toward the goals on the case plan, and an update in UNITY, including the following dimensions of the Arizona Self-Sufficiency Matrix: Shelter/Housing, Employment and Income.

4.4.3 Re-Evaluation Disposition. The case manager or authorized staff completing the re-evaluation and his or her supervisor must certify continued eligibility. Households will be informed of any changes in the type and amount of assistance approved, and reminded of their responsibilities. If the program participant is determined ineligible during the re-evaluation process, assistance must be stopped. There is no a grace period. At the time of disposition the household may be informed of alternative resources for assistance. The reason for exit from the program is recorded in HMIS.

4.5 Documentation Requirements. Documentation standards in order of preference are as follows: written third party, oral third party, and self-declaration. Whenever a lower standard of documentation is utilized, the case file will indicate all attempts to obtain the higher standard of documentation.

4.5.1 Minimum Documentation Standards. Acceptable types of documentation vary depending on the particular situation and circumstance being documented. In particular, while third party documentation should be obtained whenever possible, lack of third-party documentation must not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider (24 CFR § 576.500(b)).

4.5.1.1 Documentation of the Initial Interview. The case file must contain documentation of the initial face-to-face interview, including the barriers and challenges for achieving housing stability, and a summary of all attempts to verify the lack of resources, support networks and housing options available to the household demonstrating "but for" the HESG assistance the household would become or remain homeless. This includes the original signed application and/or intake forms, along with a certification of eligibility signed by the staff completing the face-to-face evaluation and the program supervisor or other staff authorized. Refer to Attachment F, Housing Options/Resources Eligibility Documentation Standards.

4.5.1.2 Documentation of Income. Documents and information collected to verify income must be recent. Documentation dated within 30 days prior to the time of application or recertification is acceptable unless it is not an accurate reflection of expected income. Benefit statements within the past year that can reasonably be expected to remain unchanged and/or copies of bank statements reflecting the deposited amount are acceptable. Attachment E, Requirements for Documentation of Income Verification, addresses how to verify different forms of income.

4.5.1.3 Documentation of Housing Status - Homeless Prevention. Recipients and subrecipients are responsible for verifying and documenting the risk of homelessness which qualifies the individual or family for assistance. To be eligible for HESG funded prevention assistance, there must be documentation the household would become homeless but for the assistance. In other words, a household would require emergency shelter or otherwise become literally homeless.

Documentation for a household at-risk of losing their present housing must demonstrate the loss of housing is imminent, they have no appropriate subsequent housing options, and they have no other financial resources and support networks to assist with maintaining current housing or obtaining other housing. Barriers and challenges to maintaining housing must be documented to demonstrate targeting those households at greatest risk. Housing status for prevention assistance must be documented and included in the case file.

Attachment B provides the written documentation requirements for determining eligibility for at risk of homelessness.

4.5.1.4 Documentation of Housing Status - Rapid Re-Housing. Household must be literally homeless and lack the resources and supports to obtain immediate housing without assistance. Housing status for rapid re-housing must be documented and included in the case file.

Attachment C provides the guidelines for documenting homelessness.

4.5.1.5 Self Declaration is allowable if written or verbal third party verification cannot be obtained. The case file must contain documentation of the reasons why third party written or oral verification could not be obtained timely. Such documentation should be reasonable and defensible generally indicating an urgency to provide assistance to either prevent homelessness or transition a homeless household from extremely harsh conditions. (Actions should be taken to ensure a higher standard of documentation by the time the household is being re-evaluated for eligibility.)

4.5.2 Documentation of Informed Consent to Participate. The case file will include documentation the household was informed of their responsibilities and the right to file an appeal if any decision made adversely affects their eligibility and/or the level of assistance provided. The Participation Agreement was developed to assist in documenting the household was informed about the program and the responsibilities of program participants.

5.0 Housing Relocation and Stabilization Services includes financial assistance and services and are limited to participants eligible for Homelessness Prevention or Rapid Re-Housing.

5.1 Financial Assistance. Eligible households may receive financial assistance to stabilize a current housing situation or to move into affordable housing. **ESG funded projects may “set maximum dollar amounts that the project participant may receive for each type of financial assistance under paragraph (a)” of 24 CFR 576.105. The project “may also set a maximum period for which a project participant may receive any of the type of assistance” under section 24 CFR 105” so long as it does not exceed limits set forth in 24 CFR 105. ESG projects must state these maximums in their project specific policies and procedures, including process to extend assistance if the maximum set is less than allowable by 24 CFR 576,.**

HESG funds may be used to pay housing owners, utility companies, and other third parties for the following costs:

5.1.1 Rental Application Fees. HESG funds may pay for the rental housing application fee if the expense is charged by the owner to all applicants.

5.1.2 Security Deposits. HESG funds may pay for a security deposit equal to no more than 2 month’s rent. Security 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. Pet fees or pet deposits are not an eligible HESG expense. The recipient or subrecipient will not attempt to recover security deposits.

Housing providers (e.g. landlords) may not charge fees for service animals, beyond a standard fee or security deposit that applies to all tenants who do not have pets. Therefore, HESG funds may not be used for this type of expense. If the service animal causes damage to a unit or a common area, the landlord or service provider may

charge the tenant a fee to cover the damages (for damage costs above the amount covered by the security deposit), as long as the landlord complies with their standard policies and fees, but HESG funds may not be used to pay for damage costs outside of the security deposit.

5.1.3 Last Month's Rent. If necessary to obtain housing for a program participant, the last month's rent may be paid to the owner at the time the owner is paid the security deposit and the first month's rent. This assistance must not exceed 1 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.

5.1.4 Utility Deposits. HESG funds may pay for a standard deposit required by utility companies for gas, electric, water and sewage for all customers provided the lease requires the tenant to pay utilities, the program participant is on the lease and the program participant or a member of his/her household has an account in his/her name with the utility company. The recipient or subrecipient will not attempt to recover utility deposits. 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.

5.1.5 Utility Payments. HESG funds may pay for up to 24 months of utility payments per program participant, per service, including any arrears within any 3-year period contingent on the household's eligibility and the reevaluation process required every 3 months. A partial payment of a utility bill counts as 1 month. Eligible utility services are gas, electric, water, and sewage. Telephone, internet, and cable services are not eligible. The CoC shall establish the percentage of utility costs each participant must pay while receiving homeless prevention and rapid re-housing.

5.1.5.1 Calculating Arrears for Utility Payments. Up to 6 months of utility payments in arrears may be paid for any period of time. If it cannot be determined how many months are represented by the past due amount, a minimum of \$100.00 will be considered the average monthly bill. Documentation will include all attempts to determine the number of actual months represented. A partial payment of a utility bill counts as 1 month.

5.1.5.2 Required Documentation. 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. In addition, the participant must have a lease with their name on it to prove residency, verify address of utility service, and document responsibility for utilities. Copies of the proof of responsibility should be obtained and maintained in the participant file.

5.1.5.3 Late Fees. HESG funds may only be used to pay for late fees associated with utility arrears, as long as the payment enables the program participant to remain housed or become re-housed. Case management should be proactive for households approved for utility payment assistance to ensure utility bills are submitted timely to avoid additional costs to the participant for late fees.

5.1.5.4 Utilities Only. Assistance for utilities only is eligible provided there are no other resources and/or law prohibiting the utility company from disconnecting service. If neither of these conditions exist, utility-only assistance may be justified if the household will have to abandon the housing due to a lack of utilities and can avoid moving to a shelter or if an applicant's lease includes a provision requiring utilities be maintained by the tenant (utility shut-off could constitute a lease violation, thus placing the household at risk for eviction.) In both cases, there must be documentation in the case file the utility company will shut-off the utility if the amount due is not paid.

5.1.5.5 Participant Share in the Cost – The participant will share in the cost of housing expenses to include rent

and utilities. ESG projects, as allowed by 24 CFR 576.106(4) (b) and subject to the requirements of 24 CFR 576.106, “may set a maximum amount or percentage of rental assistance that a project participant may receive, a maximum number of months that a project participating may receive rental assistance.” ESG projects must state these maximums in their project specific policies and procedures, including process to be utilized for determining participant’s share in cost as well as process to extend assistance if the maximum set is less than allowable by 24 CFR 576. Participant share in cost may be based upon a percent of household income (such as 30% of income) or as percent of housing cost; it may be a sustained amount or based on a graduated scheduled.

5.1.6 Moving Costs. HESG 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 the fees are accrued after the date the program participant begins receiving HESG services and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.

5.1.6.1 Relocation Out of State. Funds may not be used to assist a household relocate to a different state or another area of the state.

5.1.6.2 Evaluating Estimated Cost. A process must be used to determine costs are reasonable, such as, requiring 3 bids or qualifying eligible vendors.

5.1.7 Habitability Standards - A Habitability Assessment must be completed prior to payment of HESG funds for any eligible cost. A recipient or subrecipient must determine a process to ensure the housing where the participant resides or plans to move into meets the Habitability Standards before processing payment of financial or rental assistance. Documentation the unit meets the Habitability Standards must be included in participant files. Costs may be reimbursed as financial assistance.

5.2 Services Cost. Supportive services are eligible and focused on housing stabilization, linking program participants to community resources and mainstream benefits and helping them develop a plan for preventing future housing instability. Services for program participants must be coordinated with other community resources. Each program participant may receive housing relocation and stabilization services for up to 24 months, contingent on the household’s eligibility and the reevaluation process required every 3 months. HESG funds may be used to pay for the following costs:

5.2.1 Housing Search and Placement. Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing, include the following:

- a. Assessment of housing barriers, needs, and preferences;
- b. Development of an action plan for locating housing;
- c. Housing search;
- d. Outreach to and negotiation with owners;
- e. Assistance with submitting rental applications and understanding leases;
- f. Assessment of housing for compliance with HESG requirements for habitability, lead-based paint, and rent reasonableness;
- g. Assistance with obtaining utilities and making moving arrangements; and
- h. Tenant counseling

5.2.2 Housing Stability Case Management. Case management is a mandatory service regardless of the amount of assistance provided. Case managers or other qualified personnel are responsible for completion of the initial face-to-face interview and plan addressing how the household will achieve housing stability and retain stability after HESG assistance ends. This includes assisting a program participant in overcoming immediate barriers to obtaining and retaining housing, and connecting

program participants to mainstream and other resources.. While receiving HESG assistance the recipient or subrecipient is required to provide case management no less than once per month to assist the program participant in ensuring long-term housing stability.

5.2.2.1 Requirements of Case Management:

- a. Conducting the initial evaluation required under § 576.401(a), including verifying and documenting eligibility, for individuals and families applying for prevention assistance or rapid re-housing;
- b. Developing, securing, and coordinating services including assistance in obtaining permanent housing, medical health treatment, mental health treatment, counseling, supervision, health care, and other services essential for achieving independent living and obtaining Federal, State, and local benefits including Medicaid, Supplemental Nutrition Assistance Program, Women, Infants and Children (WIC), Federal-State Unemployment Insurance Program, Social Security Disability, Supplemental Security Income, and Child and Adult Care Food Program;
- c. Monitoring and evaluating program participant progress;
- d. Providing information and referrals to other providers;
- e. Developing an individualized housing and service plan, including planning a path to permanent housing stability; and
- f. Conducting re-evaluations required under § 576.401(b).

5.2.2.2 Housing Stability Plan. The housing stability plan shall take 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. The plan must indicate measurable goals and objectives derived from the evaluation of the household, the resources necessary to achieve the stated goals along with the name of the individual or agency responsible, and time frames for achievement. The plan must be signed and dated by the program participant and other members of the household as appropriate. The plan must be included in the case file and a copy must be given to the program participant. A periodic review of the plan is necessary for those participants receiving ongoing assistance to assess the progress and ensure services, goals, and objectives continue to be appropriate to address the household's needs. Documentation of the review must be recorded in the case file.

5.2.2.3 Maximum Case Management. Case management cannot exceed 30 days during the period participant is seeking permanent housing and 24 months during the period participant is living in permanent housing. If the program participant needs more than 30 days of housing stability case management while sleeping on the street, the cost must be charged to either essential services of Emergency Shelter or Street Outreach case management, as appropriate. These costs are subject to the cap on these components.

5.2.3 Mediation. HESG funds may pay for mediation between the program participant and the owner or person(s) with whom the program participant is living, provided the mediation is necessary to prevent the program participant from losing permanent housing in which the program participant currently resides.

5.2.4 Legal Services. HESG funds may pay for legal services, as set forth in § 576.102(a)(1)(vi), provided the eligible subject matters also include landlord/tenant matters, and the services must be necessary to resolve a legal problem prohibiting 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. This may include landlord/tenant matters; child support; guardianship, paternity, emancipation, and legal separation; orders of protection and other civil remedies for victims of DV; appeal of veterans and public benefit claim denials; and the resolution of outstanding criminal warrants.

5.2.4.1 Legal Fees Incurred by Landlords. HESG funds may be used to reimburse landlords for the legal costs and filing fees they incurred through eviction proceedings against an HESG program participant so long as the costs are necessary to resolve a legal problem that prohibits the participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which he/she currently resides. (See § 576.105(b)(4)) and § 576.102(a)(1)(vi)(E)). For the Homelessness Prevention and Rapid Re-Housing programs the legal fees described are part of housing relocation and stabilization services and must be separate from rental arrears.

5.2.5 Credit Repair. HESG 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.

6.0 Rental Assistance. This activity is limited to those participants who are eligible for homelessness prevention or rapid re-housing assistance. The purpose is to allow individuals and families to remain in their existing rental units and help those households who must relocate to more suitable housing or households who are literally homeless move into and retain a selected rental unit. The maximum amount of assistance may not exceed 24 months including rental assistance, rental arrears, and last's month's rent if required along with the security deposit, and may be less based on standards established by the CoC.

6.1 Type of Rental Assistance. HESG Funds may provide up to 24 months of assistance including any arrears contingent on the household's eligibility and the re-evaluation process required every 3 months.

6.1.1 Short-term Rental Assistance. Up to 3 months of rental assistance is considered short-term.

6.1.2 Medium-term Rental Assistance. More than 3 months of rental assistance and up to 24 months in any 3 year period is considered medium-term.

6.1.3 Rental Assistance Arrears. A one-time payment for up to 6 months of rent arrears, including late fees on arrears, may be paid if the payment enables the program participant to return to the housing unit for which the arrears are being paid or move to another unit. Payments for rental arrears must be included in determining the total period of the program participant's rental assistance, which may not exceed 24 months. Rental assistance for past due fees for a lot on which a trailer is located are eligible.

6.1.3.1 Calculating Rental Arrears. Arrears may be paid regardless of when they were incurred, provided the existence of the arrears prevents the eligible participant from obtaining housing. In cases where an eviction cannot be prevented, rental arrears may be paid if the existence of the arrears prevents the eligible participant from obtaining housing and it satisfies the grievance with the evicting landlord. Legal fees incurred by the landlord are eligible under financial assistance and should not be included with the arrears.

6.1.3.2 Arrears with Other Subsidy. Rental arrears can be paid on behalf of a person receiving a subsidy from another public program (e.g., Section 8, VASH, HOPWA) because it represents a different time period and cost type than the rental subsidy (i.e., the arrears represents a back payment of the tenant portion, and the current rental assistance is a forward payment).

6.2 Processing Rental Assistance. Prior to making payments to any landlord, the case manager must confirm the ownership of the property, the actual amount owed, that the rent is reasonable and does not exceed Fair Market Rent (FMR), and that the unit meets the habitability standards including no current code violations. A tenant lease and an assistance agreement between the recipient or subrecipient and the property owner or manager are also required before payment can be processed.

6.2.1 Ownership of the Property. Payment must be made to the owner of the property as recorded on the Hillsborough County Property Appraiser's website (<http://www.hcpafl.org/>) unless there is a property management agreement signed by the owner. The owner or authorized property manager shall be the same as recorded on the lease.

6.2.1.1 Confirmation of Amount Owed. The owner or property manager must provide proof of the amount owed or that the amount of rent to be charged is consistent with the amount charged for other unassisted units.

6.2.1.2 Conflict of Interest-Property Ownership. Properties owned by the recipient, subrecipient or the parent, subsidiary or affiliated organization of the recipient, subrecipient may not receive HESG payments. However, a waiver may be requested of HUD for good cause

6.2.2 Rent Reasonableness. Whether a household is seeking prevention assistance or rapid re-housing the process for determining acceptable rent amounts is the same. The gross rent must be reasonable in relation to the rents being charged for comparable units in the private (unassisted) market **and** cannot exceed HUD's published Fair Market Rent (FMR) for the area.

6.2.2.1 Determining Gross Rent. This is the sum of the rent paid to the owner plus, if the tenant pays separately for utilities, the monthly allowance for utilities established by Tampa Housing Authority or other public housing authority representing the area served, and any other required fees charged to all tenants not including late or pet fees. For these purposes, utilities include electricity, gas, water and sewer, and trash removal services but not cable or satellite television service, or internet service. If the owner pays for all utilities, then gross rent equals the rent paid to the owner.

6.2.2.2 Determining Fair Market Rent. FMRs for each fiscal year can be found by visiting HUD's website at www.huduser.org/portal/datasets/fmr.html and clicking on the current "Individual Area Final FY20__ FMR Documentation" link. This site allows recipients/subrecipients to search for FMRs by selecting their state and county from the provided list. If the unit's gross rent is at or below FMR, the recipient or subrecipient must determine if the rent is reasonable.

6.2.2.3 Assessing Rent Reasonableness. Recipients and subrecipients should determine rent reasonableness by considering the location, quality, size, type, and age of the unit, and any amenities, maintenance, and utilities to be provided by the owner. The basis for the determination must be supported by the evidence documented in the case file. Recipients and subrecipients shall select a method for determining rent reasonableness and apply it consistently. Methods for determining rent reasonableness include:

- a. Reviewing advertisements for comparable rental units.
- b. Using a market study of rents charged for units of different sizes in different locations (Before completing a market study a subrecipient must consult with the recipient of the contracted HESG funds.)
- c. Written verification signed by the property owner or management company, on letterhead, affirming that the rent for a unit assisted with HESG funds is comparable to current rents charged for similar unassisted units managed by the same owner.
- d. Use of an approved resource such as GoSection8.com, a rental listing service for Section 8 housing program tenants, landlords and public housing agencies in the United State
<http://www.gosection8.com/public-housing-authorities/>.

6.2.2.4 Final Determination of Rent Reasonableness. If the gross rent is at or below both the FMR **and** the

rent reasonableness standard for a unit of comparable size, type, location, amenities, etc., HESG funds may be used to pay the rent amount for the unit. If the gross rent for the unit exceeds either the rent reasonableness standard or FMR, HESG funds may not be used for rental assistance for any portion of the rent, even if the household is willing and/or able to pay the difference.

6.2.2.5 Occupancy Standards Guidelines. There are no federal occupancy standards. The appropriate housing and unit size must take into account the overall household configuration and general need most suitable for the household, as well as their projected income after HESG assistance ends. The following guideline should be used to avoid overcrowding conditions: maximum of 2 individuals per bedroom, and 2 individuals per living/sleeping room:

Unit Size Maximum	# in Household
0 Bedroom	1 person
1 Bedroom	4 persons
2 Bedroom	6 persons
3 Bedroom	8 persons
4 Bedroom	10 persons

6.2.2.6 Rent Reasonableness - Other Considerations. Rent reasonableness and FMR requirements do not apply when a program participant receives only financial assistance or services under Housing Stabilization and Relocation Services. HESG funds may be used: (1) to pay for financial assistance and services to help the eligible program participant stay in the unit, or (2) to pay for financial assistance and services to locate and move to a different unit that meets the rent reasonableness standard and is at or below FMR and pay rental assistance in that unit if all other requirements are met.

6.2.3 Habitability Standards. A Habitability Assessment must be completed prior to **any** payment using HESG funds to help a participant remain in or move into housing. This includes when HESG funds are used only for housing relocation and stabilization services.

6.2.3.1 Key Aspects of Habitability Assessment. Performance and acceptability criteria include the following key aspects of housing quality:

- a. Sanitary facilities;
- b. Food preparation and refuse disposal;
- c. Space and security;
- d. Thermal environment;
- e. Illumination and electricity;
- f. Structure and materials;
- g. Interior air quality;
- h. Water supply;
- i. Lead-based paint;
- j. Access;
- k. Site and neighborhood;
- l. Sanitary condition; and
- m. Smoke detectors.

6.2.3.2 Lead-Based Paint Requirements. The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4801 et seq.), as amended by the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851 et seq.) and implementing regulations at 24 CFR part 35, subparts A, B, M, and R shall apply to housing occupied by families receiving any type of assistance through HESG funds. This requires a lead-based paint visual inspection of any housing constructed before 1978 where children under the age of 6 reside or will

reside. The cost of conducting a Lead-Based Paint visual assessment is an eligible financial assistance expense. If peeling/deteriorated paint is detected during the visual assessment, costs associated with testing and repair/cleanup is not eligible; however, once the deteriorated paint has been repaired, the cost of a Clearance Exam is an eligible expense under the financial assistance category.

6.2.4 Lease Requirements. A legally binding lease between program participant and owner/property manager is required unless financial assistance is limited solely to payment of rental arrears. Oral leases are enforceable in Florida and acceptable when HESG assistance is solely for rental arrears. For rapid re-housing there must be some form of agreement to enter into a lease and a copy of the signed lease must be received by the case manager and maintained in the case file.

6.2.4.1 Lot Rent. Rental assistance may be used to pay for a lot on which manufactured homes/trailer is located provided there is a lease agreement in place.

6.2.4.2 Conflict of Interest. Assistance cannot be provided to an individual renting from a friend or relative if a legal lease is not in place. In cases where an individual is renting a unit from a friend or relative and a legal lease is in place, it must be demonstrated the arrangement is not in violation of the conflict of interest provisions (e.g., the rent charged and the terms of the lease must be the same for the participant as they are for other tenants renting comparable units).

6.2.4.3 Sublease. A sublease is considered a legal lease. However, before determining eligibility, the relationship between the participant and the landlord must be determined not to be in violation of the conflict of interest provisions

6.2.4.4 Rent-to-Own. Households in a rent-to-own or lease-in-place situation may be assisted as long as the individual would be homeless “but for” the assistance, the full amount of the financial assistance is going towards rent or utilities, and none of the HESG funds are being used for taxes or fees associated with homeownership.

6.2.5 Agreement to Participate. The recipient or subrecipient may make rental assistance payments only to an owner or property manager with whom the recipient or subrecipient has entered into a rental assistance agreement.

6.2.5.1 Terms of the Rental Assistance Agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided. The rental assistance agreement must provide that, during the term of the agreement, the owner or property manager must give the recipient or 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. The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant’s lease.

6.2.5.2 Termination of the Rental Assistance Agreement. The rental assistance agreement with the owner or property manager must terminate and no further rental assistance payments under that agreement may be made if: 1. The program participant moves out of the housing unit for which the program participant has a lease; 2. The lease terminates and is not renewed; or 3. The program participant becomes ineligible to receive HESG rental assistance.

6.2.6 Participant Share of Cost. The participant will share in the cost of housing expenses to include rent and utilities. ESG projects, as allowed by 24 CFR 576.106(4) (b) and subject to the requirements of 24 CFR 576.106, “may set a maximum amount or percentage of rental assistance that a project participant may receive, a maximum number of months that a project participating may receive rental assistance.” ESG projects must

state these maximums in their project specific policies and procedures, including process to be utilized for determining participant's share in cost as well as process to extend assistance if the maximum set is less than allowable by 24 CFR 576. Participant share in cost may be based upon a percent of household income (such as 30% of income) or as percent of housing cost; it may be a sustained amount or based on a graduated scheduled.

6.2.6.1 Request for Waiver. A case manager may request a waiver if the participant is unable to pay their portion in the first or subsequent months. Documentation in the case file and the request for waiver must justify the request as a part of the long-term stability plan for the household..

6.2.7 Late Payment Fees. Late fees are only allowed with one-time arrears assistance. HESG specifically prohibits late payment fees incurred by recipient or subrecipient. The recipient or subrecipient is solely responsible for paying late payment penalties that it incurs with non-HESG funds.

6.3 Rental Assistance with Other Subsidies. Except for one-time payment of arrears on tenant's portion of rent payment, rental assistance cannot be provided to participant who is receiving tenant-based assistance or living in a housing unit receiving project-based rental assistance or operating assistance through other public sources during same time period. 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. Tax credit projects could be eligible—the rental "subsidy" received from a tax credit property is not considered the same "cost type" as direct rental assistance. However, if a recipient or subrecipient has any financial interest, even 1% or less in the project, it invokes the conflict of interest provisions and requires a waiver from HUD before it could be utilized.

6.4 Ineligible and Prohibited Activities

6.4.1 Mortgage Costs - Financial assistance may not be used to pay for any mortgage costs or costs needed by homeowners to assist with any fees, taxes, or other costs of refinancing a mortgage to make it affordable. Legal costs associated with refinancing a mortgage are also excluded. Households may receive financial assistance in securing permanent rental housing if they are relocating due to foreclosure and meet all other eligibility requirements for the program.

6.4.2 Cooperative Housing Developments and/or mutual housing projects are generally recognized by state law as forms of homeownership. Since HESG funds may not be used for payments associated with homeownership, payments for charges included as part of homeownership in a cooperative development are not eligible. However, the household may be assisted with utilities if the participant meets all of the eligibility criteria, or they could be assisted to move to other housing if they are going to become homeless.

7.0 Termination of Assistance. If a program participant violates program requirements, the recipient or subrecipient may terminate after examining all extenuating circumstances to ensure a program participant's assistance is terminated only in the most severe cases.

7.1 Requirement of Due Process. Termination requires a formal due process that 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.

7.2 Documentation Requirements of Terminations. A record shall be maintained of all program participants terminated for violating program requirements. (This does not include participants who are terminated because

they no longer meet the eligibility criteria for the program.)

7.3 Ability to Provide Further Assistance. Termination does not bar the recipient or subrecipient from providing further assistance at a later date to the same family or individual.

8.0 Additional Requirements

8.1 Coordination with Other Targeted Homeless Services. The CoC will establish standards to coordinate and integrate, to the maximum extent practicable, HESG-funded activities with other programs targeted to homeless people in the area covered by the CoC. These programs include:

- a. Shelter Plus Care Program (24 CFR part 582);
- b. Supportive Housing Program (24 CFR part 583);
- c. Section 8 Moderate Rehabilitation Program for Single Room Occupancy Program for Homeless Individuals (24 CFR part 882);
- d. HUD—Veterans Affairs Supportive Housing (HUD—VASH) (division K, title II, Consolidated Appropriations Act, 2008, Pub. L. 110–161 (2007), 73 FR25026 (May 6, 2008));
- e. Education for Homeless Children and Youth Grants for State and Local Activities (title VII–B of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 et seq.));
- f. Grants for the Benefit of Homeless Individuals (section 506 of the Public Health Services Act (42 U.S.C. 290aa–5));
- g. Healthcare for the Homeless (42 CFR part 51c);
- h. Programs for Runaway and Homeless Youth (Runaway and Homeless Youth Act (42 U.S.C. 5701 et seq.));
- i. Projects for Assistance in Transition from Homelessness (part C of title V of the Public Health Service Act (42 U.S.C. 290cc–21 et seq.));
- j. Services in Supportive Housing Grants (section 520A of the Public Health Service Act);
- k. Emergency Food and Shelter Program (title III of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11331 et seq.));
- l. Transitional Housing Assistance Grants for Victims of Sexual Assault, Domestic Violence, Dating Violence, and Stalking Program (section 40299 of the Violent Crime Control and Law Enforcement Act (42 U.S.C. 13975));
- m. Homeless Veterans Reintegration Program (section 5(a)(1)) of the Homeless Veterans Comprehensive Assistance Act (38 U.S.C. 2021);
- n. Domiciliary Care for Homeless Veterans Program (38 U.S.C. 2043);
- o. VA Homeless Providers Grant and Per Diem Program (38 CFR part 61);
- p. Health Care for Homeless Veterans Program (38 U.S.C. 2031);
- q. Homeless Veterans Dental Program (38 U.S.C. 2062);
- r. Supportive Services for Veteran Families Program (38 CFR part 62); and
- s. Veteran Justice Outreach Initiative (38 U.S.C. 2031)

8.2 HESG Funds Used Outside the Recipient’s Jurisdiction. HESG funds are restricted for the use and benefit its own residents. Accordingly, any use of funds outside the jurisdiction must benefit the recipient’s residents. This includes, but is not limited to, funding a shelter or service provider located outside the recipient’s jurisdiction but accessed by residents of the recipient’s jurisdiction, or funding an activity serving the entire CoC, or funding a resident of the recipient’s jurisdiction who is eligible for rapid re-housing assistance but wants to live in an area outside the recipient’s boundaries. The recipient’s action plan must describe any intention to fund an activity outside the recipient’s boundaries (including the percentage of funds designated for the activity) and explain how the activity addresses the recipient’s priority needs and objectives.

8.2.1 City of Tampa will allow use of HESG funds outside of the City limit provided that the family became homeless or at risk of homelessness within the City limit.

8.2.2 Hillsborough County will allow use of HESG funds within Tampa City limits provided that the family became homeless or at risk of homelessness in the Unincorporated Area of Hillsborough county, Plant City or Temple Terrace.

8.2.3 Jurisdiction in Emergency Shelters. Emergency shelter programs providing services to both City and County homeless individuals, do we have to split up the costs between the residency status. The fact that this resource is provided within the geographic limits of another HESG recipient would not disqualify it from being a match for County HESG funds, assuming the County can use HESG funds outside of its jurisdiction.

8.3 Payment to Third Party. All payments will be paid directly to third parties, such as landlords or utility companies. No funds will be paid directly to a program participant.

8.4 Program Fees. Participants will not be charged program fees.

8.5 Temporary Absence. Once determined eligible, if a participant is temporarily away from their housing to receive inpatient care (e.g., detoxification, mental health stabilization, health care treatment), the rental assistance may continue for up to 90 days if the plan is for the person to return home to the same location and it would be more costly to allow the person to be evicted for non-payment of rent.

8.6 Eligibility of Youth. There are no age restrictions on who can be assisted; however, HESG funds may not be used to serve youth who are wards of the state. HESG funds can be used to prevent homelessness for youth aging out of foster care, as long as they meet the HESG requirements and the program participant's name is on the lease. Continued room and board costs in the youth's foster home would not be eligible, but moving the youth to a unit of his/her own would enable him/her to be eligible as long as he/she meets all of the eligibility criteria.

8.7 Performance Measures. Standards for the implementation of the HESG shall be completed as part of the consultation with the CoC. As part of this consultation with the Recipient, the CoC shall establish performance standards for implementation of the HESG and evaluation of its effectiveness to include, but is not limited to, compliance with program requirements, successful outcomes, duration of assistance, stabilization in permanent housing and recidivism.

8.8 Consultation with the CoC. The Recipient will consult with the CoC to determine how funds will be allocated, develop performance standards, evaluate outcomes of HESG-assisted projects, analyze patterns of use, and develop funding, policies and procedures for the administration of the HMIS.

8.8.1 Quarterly Reviews. Recipient, sub-recipient and/or other designated representative will report project status at the CoC Meetings, which are noticed on the Homeless Coalition's Website and open to the public. Data reported will be used to evaluate performance and make decisions adjustments in the program as appropriate.

8.8.2 Annual Review. An annual evaluation will be completed using HMIS data and input from recipients, subrecipients, participants, and other community organizations. Data reported will be used to evaluate performance and make decisions about future allocations.

9.0 Confidentiality. 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 HESG assistance will be kept secure and confidential. Unauthorized persons will not have access to files at any time. Recipients and subrecipients will develop written protocols for the safeguarding of the records and ensuring limited access.

9.1 Need to Know. Information obtained must be necessary in order to conduct assigned job duties and responsibilities. including, but not limited to, the following determining eligibility, providing training, providing

treatment for or contributing to the diagnosis of any medical or physiological illness, injury, or condition, assessing financial ability, paying any financial obligation, initiating or furthering any investigatory, regulatory, or enforcement purpose, providing any service

9.2 Address of Shelter or Housing. The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under the HESG will not be made public, except with written authorization of the person responsible for the operation of the shelter. 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.

9.3 Training. All staff and volunteers will be trained on procedures for maintaining client confidentiality. Only general program information will be released without written consent (i.e., number of children with disabilities, compiled data about a family, enrollment numbers etc.). General information DOES NOT pertain to a specific family. This includes use of verbal and written communication, email and faxing.

9.4 Right of Access for Program Monitoring. HUD, the HUD Office of the Inspector General, and the Comptroller General of the United States, or any of their authorized representatives, must have the right of access to all books, documents, papers, or other records of the recipient and its subrecipients that are pertinent to the HESG grant, in order to make audits, examinations, excerpts, and transcripts. These rights of access are not limited to the required retention period but last as long as the records are retained.

9.5 Public rights. The recipient must provide citizens, public agencies, and other interested parties with reasonable access (consistent with state and local laws regarding privacy and obligations of confidentiality and the confidentiality requirements in this part) to records regarding any uses of HESG funds the recipient received during the preceding 5 years.

10.0 Record Keeping Requirements

10.1 Housing Status. All program components are required to verify homeless status at intake. The type of documentation required will vary based on program component and homeless status. Refer to Attachments B and C for documentation requirements for At Risk of Homelessness (Homeless Prevention) and Homelessness (Rapid Rehousing).

10.2 Income. Recipient and subrecipients must maintain documentation of income eligibility for program participants including documentation that the program participant has insufficient financial resources and support networks; e.g., family, friends, faith-based or other social networks, immediately available to attain housing stability. For documentation requirements, refer to Attachment E.

10.3 Priority Order of Documentation. The highest standard of documentation is evidence in writing from a third party, followed by verification provided by the third party over the telephone or in-person directly to the organization's staff intake worker observations second, and certification from the person seeking assistance third.

10.3.1 Use of HMIS. Records contained in an HMIS or comparable database used by victim service or legal service providers are acceptable evidence of third-party documentation and intake worker observations as the HMIS used by the Tampa Hillsborough Homeless Initiative meets the required standards.

10.3.2 Self-certification. A recipient or subrecipient may ask a program participant to certify homeless status, income, lack of income or other eligibility criteria when it is not possible to obtain other documentation and/or the time required to obtain other documentation would adversely impact the households length of time living on the streets or other places not ordinarily used as sleeping accommodation.

10.3.2.1 Access to Shelter and Street Outreach. A lack of third-party documentation must not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider.

10.3.2.2 Case File. Documentation of due diligence to obtain verification must be documented in the case file along with a completed certification by the head of the household. It is not necessary for other members of the household to complete a certification.

10.4 Period of record retention. All records pertaining to each fiscal year of HESG funds must be retained for the greater of 5 years or the period specified below. Copies made by microfilming, photocopying, or similar methods may be substituted for the original records.

10.4.1 Eligibility. Documentation of each program participant's qualification as a family or individual at risk of homelessness or as a homeless family or individual and other program participant records must be retained for 5 years after the expenditure of all funds from the grant under which the program participant was served;

10.4.2 Renovation. Where HESG funds are used for the renovation of an emergency shelter involves costs charged to the HESG grant that exceed 75 percent of the value of the building before renovation, records must be retained until 10 years after the date that HESG funds are first obligated for the renovation; and

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

11.0 Match. Match is based on the total grant amount and does not have to be provided on a component-by-component basis.

11.1 Sources of HESG Eligible Match. As described in section 576.201 of the HESG Interim Rule, and the requirements for documenting matching contributions as described in section 576.500(o) federal (other than HESG), state, local, or private funds may be used to satisfy the requirement that the recipient provide matching contributions to HESG, so long as the following conditions are met:

- a. The matching funds are contributed to the HESG program and expended for the recipient or subrecipient's allowable HESG costs.
- b. If the matching funds are from another federal program, there is no specific statutory prohibition on using those funds as match;
- c. The matching funds are used in accordance with all requirements that apply to HESG grant funds, except for the expenditure limits in 24 CFR 576.100. This includes requirements such as documentation requirements, eligibility requirements, and eligible costs.
- d. The matching funds are expended (that is, the allowable cost is incurred) after the date HUD signs the grant agreement for the HESG funds being matched. (For in-kind match, it is the date the service (or other in-kind match source) is actually provided to the program or project.)
- e. The matching funds are expended by the expenditure deadline that applies to the HESG funds being matched;
- f. The matching funds have not been and will not be used to match any other Federal program's funds nor any other HESG grant;
- g. The recipient does not use HESG funds to meet the other program's matching requirements; and
- h. The recipient keeps records of the source and use of the matching funds, including the particular fiscal year

11.2 Sources Not Allowable as Match. HESG match must be contributed to the HESG program and expended for the recipient or subrecipient's. Funds covering program participant's expenses are not eligible, including, but not

limited to, SNAP benefits (food stamps), Housing Choice Vouchers, and the tenant's portion of rent, because this amount is the tenant's obligation.

11.2.1 HOME-TBRA funds generally cannot be used as match, because the requirements for rental assistance are significantly different between the two programs. HUD may approve use of HOME TBRA in rare instances.

11.2.2 SHP (CoC) funds generally cannot be used as match, because very few activity costs are allowable under both SHP and HESG. However, in some cases, HMIS or street outreach costs that are allowable under HESG may be allowable if with the conditions in 11.1 a-h are met.

11.2.2.1 HMIS costs are only eligible to be used as match under HESG if they are eligible under section 576.107 and allocable to the HESG program, whether charged as direct costs or indirect costs. If funds are being used to pay for SHP projects' data entry, those data entry costs are not allocable to the HESG program and the funds used cannot be counted as match.

11.3 Other Federal Funds. Community Services Block Grant (CSBG) funds may be used to meet the match requirements provided the activity is eligible under both programs, and as long as HUD's Appropriations Act language includes a provision authorizing recipients under HUD's McKinney-Vento Homeless Assistance Act programs to use other federal funds as match. (This provision was included for FY 2011, FY 2012, FY 2013, FY 2014, and FY 2015, so CSBG funds from those fiscal year allocations may be used to match HESG funds. However, if Congress does not include this provision in future Appropriations Act language, then using any federal funds as match for HESG funds will not be allowable.)

11.4 Non-cash Contributions are eligible provided the recipient or subrecipient would have had to pay for them with grant funds, the costs would have been allowable and the program participant meets HESG eligibility criteria. As a part of this, the recipient or subrecipient must be sure that the costs comply with all of the requirements in the HESG Interim Rule -- including documentation, HMIS, fair housing and other federal requirements, to name just a few.

11.5 Non HESG Assisted Program Match. Households receiving assistance that is an eligible cost under the HESG Rule but is funded through other resources may be considered match. A key aspect of the match requirement is that the match funds must be "contributed to" the recipient's or subrecipient's HESG program. This means that the recipient must document that the provision of non-HESG assistance to these program participants is part of the recipient's HESG program design and is going to be considered match for HESG, the recipient's Action Plan and reported on in the CAPER. In addition, any funds used to match HESG must be used for program participants that meet all of the HESG eligibility criteria. In addition, the program must meet all HESG requirements (including assessing and documenting client eligibility; in the case of emergency shelter, ensuring that the shelter meets minimum safety, sanitation, and privacy standards; and complying with all record-keeping and reporting requirements (including HMIS).



At Risk of Homelessness

CRITERIA FOR DEFINING AT RISK OF HOMELESSNESS	Category 1	Individuals and Families	<p>An individual or family who:</p> <ul style="list-style-type: none"> (i) Has an annual income below <u>30%</u> of median family income for the area; <u>AND</u> (ii) Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the “homeless” definition; <u>AND</u> (iii) Meets one of the following conditions: <ul style="list-style-type: none"> (A) Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; <u>OR</u> (B) Is living in the home of another because of economic hardship; <u>OR</u> (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; <u>OR</u> (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; <u>OR</u> (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; <u>OR</u> (F) Is exiting a publicly funded institution or system of care; <u>OR</u> (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
	Category 2	Unaccompanied Children and Youth	A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute
	Category 3	Families with Children and Youth	An unaccompanied youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) or that child or youth if living with him or her.

Emergency Solutions Grant Program
Tampa/Hillsborough County CoC
Policies and Procedures
Attachment A-1



Homeless Definition

CRITERIA FOR DEFINING HOMELESS	Category 1	Literally Homeless	(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: <ul style="list-style-type: none"> (i) Has a primary nighttime residence that is a public or private place not meant for human habitation; (ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); <u>or</u> (iii) Is exiting an institution where (s)he has resided for 90 days or less <u>and</u> who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution
	Category 2	Imminent Risk of Homelessness	(2) Individual or family who will imminently lose their primary nighttime residence, provided that: <ul style="list-style-type: none"> (i) Residence will be lost within 14 days of the date of application for homeless assistance; (ii) No subsequent residence has been identified; <u>and</u> (iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing
	Category 3	Homeless under other Federal statutes	(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who: <ul style="list-style-type: none"> (i) Are defined as homeless under the other listed federal statutes; (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; (iii) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; <u>and</u> (iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers
	Category 4	Fleeing/ Attempting to Flee DV	(4) Any individual or family who: <ul style="list-style-type: none"> (i) Is fleeing, or is attempting to flee, domestic violence; (ii) Has no other residence; <u>and</u> (iii) Lacks the resources or support networks to obtain other permanent housing

Attachment B
Emergency Solutions Grant Program
Tampa / Hillsborough County Continuum of Care
At Risk of Homelessness-Documentation Requirements (Homeless Prevention)

Category 1: Individuals & Families At Risk Documentation Requirements of Housing Status		
Risk Factor	Criteria	Source and Type
Risk 1: Persistent housing instability	Housing history must demonstrate 2 or more moves within 60 days immediately preceding the application for homelessness prevention assistance	<ul style="list-style-type: none"> •HMIS records •Referral from housing/service provider •Letter from tenant/owner <p>Intake observation is not appropriate</p>
	Economic reasons may include termination from employment, unexpected medical costs, inability to maintain housing including utilities, etc.	<ul style="list-style-type: none"> •Notice of termination •Health care bills indicating arrears •Utility bills indicating arrears <p>Intake observation is not appropriate</p>
Risk 2: Living in the home of another because of economic hardship	Housing must be in the home of another (i.e., doubled up)	<ul style="list-style-type: none"> •Letter from tenant/homeowner <p>Intake observation may be appropriate</p>
	Economic hardship may include termination from employment, unexpected medical costs, inability to maintain housing including utilities, etc.	<ul style="list-style-type: none"> •Notice of termination •Health care bills indicating arrears •Utility bills indicating arrears <p>Intake observation is not appropriate</p>
Risk 3: Housing loss within 21 days	Notification to leave within 21 days must be written	<ul style="list-style-type: none"> •If tenant/homeowner: eviction notice, court order to leave within 21 days •If living with another (doubled up): eviction letter from tenant/homeowner
	Only third party –source/written is appropriate	
Risk 4: Living in a rented hotel or motel	Housing must be in hotel/motel	<ul style="list-style-type: none"> •Letter from hotel/motel manager •Cancelled checks •Intake observation
	Costs have not be covered by charitable organization or government program	
Risk 5: Living in a severely over-crowded unit as defined by US Census Bureau	Census Bureau Definition: <ul style="list-style-type: none"> •SRO or efficiency apt: more than 2 persons •Larger housing: more than 1 ½ persons per room 	<ul style="list-style-type: none"> •Must document # of rooms in unit AND • # of individuals living in unit (Lease, Unit details from Tax Assessor’s Office, Intake observation)

**Category 1: Individuals & Families At Risk
Documentation Requirements of Housing Status**

Risk Factor	Criteria	Source and Type
Risk 6: Exiting publicly funded institution or system of care	Documenting discharge from health care facility, mental health facility, foster care or other youth facility or correction program	<ul style="list-style-type: none"> • Discharge paperwork • Referral letter
Risk 7: Living in housing associated with instability & an increased risk of homelessness as described in approved Consolidated Plan	Appropriate documentation depends on characteristics identified in Recipient's Approved Consolidated Plan	Policies and procedures must establish documentation requirements in line with HUD's required order

**Category 2: Unaccompanied Youth
Documentation Requirements of Housing Status**

Category Definition	Criteria	Source and Type
Defined under another Federal Statute	Verification of Homeless Status must be provided by agency administering applicable Federal program	<ul style="list-style-type: none"> • Third Party • Written ONLY • Certification of homeless status (letter or standardized form)

**Category 3: Children Eligible Under McKinney Vento
Documentation Requirements of Housing Status**

Defined under § 725(2) of McKinney-Vento	Third Party –Written ONLY	–Certification of homeless status –May be letter or referral (**recommend standardized Homeless Certification form) – Provided by agency administering Federal program –Must confirm that family/guardian is residing with children/youth
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**Tampa/Hillsborough County CoC HESG Program - Rapid Re-Housing Assistance
Requirements for Documentation of Homeless Status**

Living Situation	Acceptable Types of Documentation (in order of preference)	Documentation Requirements and Process*
<p>Staying at an emergency shelter</p> <p>This only includes Emergency Shelter programs identified in the Continuum of Care’s (CoC) most recent Housing Inventory Chart submitted to HUD or otherwise recognized by the CoC as part of the CoC inventory (e.g. newly established Emergency Shelters)</p>	HMIS Record of Shelter Stay	<ul style="list-style-type: none"> ❖ Obtain HMIS record showing shelter stay concurrent with HESG program entry date. ❖ Include HMIS record in HESG participant file
	Written authorized homeless certification form	<p style="text-align: center;">OR (if HMIS record cannot be obtained)</p> <ul style="list-style-type: none"> ❖ Obtain signed and dated original Homeless Certification from shelter provider. ❖ Include Homeless Certification in HESG participant file
	Letter provided by the emergency shelter	<p style="text-align: center;">OR (if HMIS record and HESG Homeless Certification cannot be obtained)</p> <ul style="list-style-type: none"> ❖ Obtain letter from emergency shelter provider. ❖ Letter Must: <ul style="list-style-type: none"> • Be on shelter provider letterhead • Identify shelter program • Include statement verifying current shelter occupancy of HESG participant, including most recent entry and exit (if applicable) dates. ❖ Be signed and dated by shelter provider ❖ Include emergency shelter provider letter in participant file
<p>Places not meant for human habitation, such as cars, parks, abandoned buildings, and streets/sidewalks.</p>	Written authorized homeless certification form	<ul style="list-style-type: none"> ❖ Obtain signed and dated original Homeless Certification from homeless street outreach provider. ❖ Include Homeless Certification in HESG participant file.
	Letter from homeless street outreach provider	<p style="text-align: center;">OR (if HESG Homeless Certification cannot be obtained)</p> <ul style="list-style-type: none"> ❖ Obtain letter from homeless street outreach provider (The letter may be from the HESG-funded rapid re-housing provider if the provider also provides street outreach to persons on the streets as part of engagement and admission activities.) ❖ Letter Must: <ul style="list-style-type: none"> • Be on outreach provider letterhead • Identify outreach program • Include statement verifying current homeless status of HESG recipient • Be signed and dated by outreach provider ❖ Include outreach provider letter in the participant file

Living Situation	Acceptable Types of Documentation (in order of preference)	Documentation Requirements and Process*
	<p style="text-align: center;">OR (if HESG Homeless Certification and provider letter cannot be obtained)</p> <p>Self-declaration of homelessness. (Refer to template provided by the Homeless Coalition.)</p>	<ul style="list-style-type: none"> ❖ Obtain signed and dated original self-declaration from applicant. ❖ HESG worker must document attempt to obtain written third party verification and sign self-declaration form. ❖ Include self-declaration in participant file.
<p>Staying in a hospital or other institution <u>for up to 90 days and was sleeping in an emergency shelter or other place not meant for human habitation (cars, parks, streets, etc.) immediately prior to entry into the hospital or institution;</u></p>	<p>Letter from hospital or other institution</p> <p style="text-align: center;">AND (to verify homeless status prior to hospital or other institution admission)</p> <p>HMIS record of shelter stay (if previously sleeping in emergency shelter).</p>	<ul style="list-style-type: none"> ❖ Obtain letter from hospital or other institution. ❖ Letter Must: <ul style="list-style-type: none"> • Be on hospital or other institution letterhead • Include statement verifying current hospital/institution stay of HESG participant • Include hospital/institution admission and discharge dates verifying that stay has been for 180 days or less • Be signed and dated by hospital/institution representative ❖ Include hospital/institution letter in participant file. <ul style="list-style-type: none"> ❖ Obtain HMIS record showing shelter stay concurrent with HESG program entry date. ❖ HMIS record must indicate shelter stay immediately prior to (i.e. the day before or same day as) hospital/institution admission date. ❖ Include HMIS record in HESG participant file. <p style="text-align: center;">OR (if HMIS record cannot be obtained)</p>

Living Situation	Acceptable Types of Documentation (in order of preference)	Documentation Requirements and Process*
	Written authorized homeless certification form if previously sleeping in emergency shelter or place not meant for human habitation).	<ul style="list-style-type: none"> ❖ Obtain signed and dated original Homeless Certification from shelter provider or homeless street outreach provider. ❖ Certification must verify homelessness (residing in shelter or place not meant for human habitation) immediately prior to (i.e. the day before or same day as) hospital/institution admission date. ❖ Include Homeless Certification in HESG participant file.
Or if HMIS record and HESG Homeless Certification cannot be obtained		
	Emergency shelter provider or homeless street outreach provider letter (if previously sleeping in emergency shelter or place not meant for human habitation).	<ul style="list-style-type: none"> ❖ Obtain emergency shelter provider letter. ❖ Letter Must: <ul style="list-style-type: none"> • Be on shelter provider letterhead • Identify shelter program • Include statement verifying shelter stay immediately prior to (i.e. the day before or same day as) hospital/institution admission date. • Be signed and dated by shelter provider ❖ Include documentation in HESG participant file.
OR (if HMIS record, HESG Homeless Certification, or provider letter cannot be obtained)		
	Self-declaration of homelessness. (Refer to template provided by Homeless Coalition.)	<ul style="list-style-type: none"> ❖ Obtain signed and dated original self-declaration from applicant. ❖ Self-declaration must verify homelessness (residing in shelter or place not meant for human habitation) immediately prior to (i.e. the day before or same day as) hospital/institution admission date. ❖ HESG worker must document attempt to obtain written third party verification and sign HESG Self-Declaration form. ❖ Include self-declaration in participant file.
Transitional Housing Note: This only includes	Written homeless certification. (Refer to template provided by Homeless Coalition.)	<ul style="list-style-type: none"> ❖ Obtain signed and dated original Homeless Certification from transitional housing provider. ❖ Include Homeless Certification in HESG participant file.

Living Situation	Acceptable Types of Documentation (in order of preference)	Documentation Requirements and Process*
<p>Transitional Housing programs serving homeless persons (per HUD’s definition) and listed in the Continuum of Care’s (CoC) most recent Housing Inventory Chart submitted to HUD or otherwise recognized by the CoC as part of the CoC inventory (e.g. newly established Transitional Housing programs).</p> <p>Persons do not need to be “graduating or timing out” but must be leaving the facility.</p>	<p style="text-align: center;">OR (if HESG Homeless Certification cannot be obtained)</p> <p>Transitional housing provider letter.</p>	<ul style="list-style-type: none"> ❖ Obtain letter from transitional housing provider. ❖ Letter Must: <ul style="list-style-type: none"> • Be on transitional housing provider letterhead. • Identify transitional housing program. • Include statement verifying current transitional housing occupancy and of HESG participant. • Include statement verifying that HESG applicant is graduating from or timing out of transitional housing program. • Include statement verifying HESG applicant was residing in emergency shelter or place not meant for human habitation immediately prior to transitional housing admission. • Be signed and dated by transitional housing provider. ❖ Include transitional housing provider letter in participant file.
<p>Domestic Violence (Eligible if assistance is needed to leave domestic violence situation)</p>	<p>Self-declaration of homelessness. (Refer to template provided by Homeless Coalition)</p>	<ul style="list-style-type: none"> ❖ Obtain signed and dated original self-declaration from applicant. (If the participant is unable to prepare the verification, assistance can be provided in preparing a written statement about the participant’s previous living situation as long as the participant signs and dates the statement.) ❖ HESG worker must document attempt to obtain written third party verification and sign self-declaration form. ❖ Copy of police report if available. ❖ Include self-declaration in participant file

* In all cases there must also be documentation the individual lacks resources, lacks a subsequent residence and lacks a support network.

Income Inclusions & Exclusions

Income Inclusions

This table presents the HESG income inclusions. The following types of income must be counted when calculating gross income:

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

Income Exclusions

This table presents the HESG income exclusions. The following types of income are not counted when calculating gross income:

General Category	Description
1. Income of Children	Income from employment of children (including foster children) under the age of 18 years.
2. Inheritance and Insurance Income	Lump-sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains and settlement for personal or property losses (except as provided in number 5 of Income Inclusions).
3. Medical Expense Reimbursements	Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member.

General Category	Description
4. Income of Live-in Aides	Income of a live-in aide (as defined in 24 CFR 5.403).
5. Disabled Persons	Certain increases in income of a disabled member of qualified families residing in HOME assisted housing or receiving HOME tenant-based rental assistance (24 CFR 5.671(a)).
6. Student Financial Aid	The full amount of student financial assistance paid directly to the student or to the educational institution.
7. Armed Forces Hostile Fire Pay	The special pay to a family member serving in the Armed Forces who is exposed to hostile fire.
8. Self-Sufficiency Program Income	<ul style="list-style-type: none"> a. Amounts received under training programs funded by HUD. b. Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set side for use under a Plan to Attain Self-Sufficiency (PASS). c. Amounts received by a participant in other publicly assisted programs that are specifically for, or in reimbursement of, out-of-pocket expenses incurred (special equipment, clothing, transportation, childcare, etc.) and which are made solely to allow participation in a specific program. d. Amounts received under a resident service stipend. A resident service stipend is a modest amount (not to exceed \$200 per month) received by a resident for performing a service for the PHA or owner, on a part-time basis, that enhances the quality of life in the development. e. Incremental earnings and benefits resulting to any family member from participation in qualifying state or local employment training programs (including training not affiliated with a local government) and training of a family member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives, and are excluded only for the period during which the family member participates in the employment training program.
9. Gifts	Temporary, nonrecurring, or sporadic income (including gifts).
10. Reparations	Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era.
11. Income from Full-time Students	Earnings in excess of \$480 for each full-time student 18 years old or older (excluding the head of household or spouse).
12. Adoption Assistance Payments	Adoption assistance payments in excess of \$480 per adopted child.
13. Social Security & SSI Income	Deferred periodic amounts from SSI and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts.
14. Property Tax Refunds	Amounts received by the family in the form of refunds or rebates under state or local law for property taxes paid on the dwelling unit.

General Category	Description
15. Home Care Assistance	Amounts paid by a state agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep this developmentally disabled family member at home.
15. Other Federal Exclusions	<p>Amounts specifically excluded by any other federal statute from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under any program to which the exclusions of 24 CFR 5.609(c) apply, including:</p> <ul style="list-style-type: none"> ❖ The value of the allotment made under the Food Stamp Act of 1977; ❖ Payments received under the Domestic Volunteer Service Act of 1973 (employment through VISTA, Retired Senior Volunteer Program, Foster Grandparents Program, youthful offender incarceration alternatives, senior companions); ❖ Payments received under the Alaskan Native Claims Settlement Act; ❖ Income derived from the disposition of funds to the Grand River Band of Ottawa Indians; ❖ Income derived from certain submarginal land of the United States that is held in trust for certain Indian tribes; ❖ Payments or allowances made under the Department of Health and Human Services' Low-Income Home Energy Assistance Program; ❖ Payments received under the Maine Indian Claims Settlement Act of 1980 (25 U.S.C. 1721); ❖ The first \$2,000 of per capita shares received from judgment funds awarded by the Indian Claims Commission or the U.S. Claims Court and the interests of individual Indians in trust or restricted lands, including the first \$2,000 per year of income received by individual Indians from funds derived from interests held in such trust or restricted lands; ❖ Amounts of scholarships funded under Title IV of the Higher Education Act of 1965, including awards under the Federal workstudy program or under the Bureau of Indian Affairs student assistance programs; ❖ Payments received from programs funded under Title V of the Older Americans Act of 1985 (Green Thumb, Senior Aides, Older American Community Service Employment Program); ❖ Payments received on or after January 1, 1989, from the Agent Orange Settlement Fund or any other fund established pursuant to the settlement in the In Re Agent Orange product liability litigation, M.D.L. No. 381 (E.D.N.Y.); ❖ Earned income tax credit refund payments received on or after January 1, 1991, including advanced earned income credit payments; ❖ The value of any child care provided or arranged (or any amount received as payment for such care or reimbursement for costs incurred for such care) under the Child Care and

General Category	Description
	<p>Development Block Grant Act of 1990;</p> <ul style="list-style-type: none"> ❖ Payments received under programs funded in whole or in part under the Job Training Partnership Act (employment and training programs for Native Americans and migrant and seasonal farm workers, Job Corps, state job training programs and career intern programs, AmeriCorps); ❖ Payments by the Indian Claims Commission to the Confederated Tribes and Bands of Yakima Indian Nation or the Apache Tribe of Mescalero Reservation; ❖ Allowances, earnings, and payments to AmeriCorps participants under the National and Community Service Act of 1990; ❖ Any allowance paid under the provisions of 38 U.S.C. 1805 to a child suffering from spina bifida who is the child of a Vietnam veteran; ❖ Any amount of crime victim compensation (under the Victims of Crime Act) received through crime victim assistance (or payment or reimbursement of the cost of such assistance) as determined under the Victims of Crime Act because of the commission of a crime against the applicant under the Victims of Crime Act; and ❖ Allowances, earnings, and payments to individuals participating in programs under the Workforce Investment Act of 1998.

**Tampa/Hillsborough County CoC HESG Program
Requirements for Documentation of Income Verification**

The chart below outlines standards and describes documentation requirements for the various types of income. In some instances, only applicant self-declaration may be possible. This method should be used only as a *last resort* when all other verification methods are not possible or reasonable. When using applicant self declaration, there must be documentation indicating why a higher verification standard was not used.

Type of Income	Acceptable Types of Documentation (in order of preference)	Documentation Requirements and Process
Wages and Salary	Copy of most recent paystub(s)	<ul style="list-style-type: none"> ❖ Obtain copy(ies) of most recent pay stub(s) from applicant. ❖ Include copy(ies) in participant file.
	Or	
	Written verification of income. (Refer to Income Verification template provided by Homeless Coalition.)	<ul style="list-style-type: none"> ❖ Mail, fax or email written verification of income request directly to the employer(s). ❖ Obtain signed and dated verification of income from employer(s). ❖ Include verification of income in participant file.
	OR (if written third party documentation cannot be obtained)	
	Oral verification of income. (Refer to Income Verification template provided by Homeless Coalition.)	<ul style="list-style-type: none"> ❖ Contact the employer(s) by phone or in person to obtain oral verification of income. ❖ Document oral verification of income. ❖ Include HESG Verification of Income in participant file.
	OR (if written documentation or oral third party verification cannot be obtained)	
Self-declaration of income. (Refer to Self-Declaration of Income template provided by Homeless Coalition.)	<ul style="list-style-type: none"> ❖ Obtain signed and dated original self-declaration of income from applicant. ❖ Must document attempt to obtain third party verification (written or oral) and sign self-declaration of income. ❖ Include self-declaration of income in participant file. 	
Self Employment/ Business Income	Copy of most recent federal or state tax return showing net business income	<ul style="list-style-type: none"> ❖ Obtain copy of most recent federal or state tax return from the applicant. ❖ Include copy in participant file

Type of Income	Acceptable Types of Documentation (in order of preference)	Documentation Requirements and Process
	OR (if written documentation cannot be obtained)	
	Self-declaration of income. (Refer to Self-Declaration of Income template provided by Homeless Coalition.)	<ul style="list-style-type: none"> ❖ Obtain signed and dated original self-declaration of income from applicant. ❖ Must document attempt to obtain third party verification (written or oral) and sign self-declaration of income. ❖ Include self-declaration of income in participant file.
Interest and dividend income	Copy of most recent interest or dividend income statement	<ul style="list-style-type: none"> ❖ Obtain copy(ies) of most recent interest or dividend income statement from applicant ❖ Include copy(ies) in participant file.
	Or	
	Copy of most recent federal or state tax return showing interest, dividend or other net income	<ul style="list-style-type: none"> ❖ Obtain copy of most recent federal or state tax return from the applicant. ❖ Include copy in participant file.
	OR (if written documentation cannot be obtained)	
Pension/Retirement income	Copy of most recent payment statement or benefit notice from Social Security Administration (SSA), pension provider, or other source	<ul style="list-style-type: none"> ❖ Obtain copy(ies) of most recent benefit notice, pension statement or other payment statement from applicant. ❖ Include copy(ies) in participant file.
	Or	
	Written verification of income. (Refer to Income Verification template provided by Homeless Coalition.)	<ul style="list-style-type: none"> ❖ Mail, fax or email verification of income request directly to the Social Security Administration, pension provider or other source. ❖ Obtain signed and dated verification of income from income source. ❖ Include HESG Verification of Income in participant file.

Type of Income	Acceptable Types of Documentation (in order of preference)	Documentation Requirements and Process
	OR (if written third party documentation cannot be obtained)	
	Oral verification of income. (Refer to Income Verification template provided by Homeless Coalition.)	<ul style="list-style-type: none"> ❖ Contact the source(s) by phone or in person to obtain oral verification of income. ❖ Document oral verification of income. ❖ Include HESG Verification of Income in participant file.
	OR (if written documentation or oral third party verification cannot be obtained)	
	Self-declaration of income. (Refer to Self-Declaration of Income template provided by Homeless Coalition.)	<ul style="list-style-type: none"> ❖ Obtain signed and dated original self-declaration of income from applicant. ❖ Must document attempt to obtain third party verification (written or oral) and sign self-declaration of income. ❖ Include self-declaration of income in participant file.
Unemployment and Disability Income	Copy of most recent unemployment, worker’s compensation, SSI, SSDI, or severance payment statement or benefit notice	<ul style="list-style-type: none"> ❖ Obtain copy(ies) of most recent payment statement(s) and/or benefit notice(s) from applicant. ❖ Include copy(ies) in participant file.
	Or	
	Written verification of income. (Refer to Income Verification template provided by Homeless Coalition.)	<ul style="list-style-type: none"> ❖ Mail, fax or email verification of income request directly to the unemployment administrator, worker’s compensation administrator, or former employer ❖ Obtain signed and dated verification of income from income source. ❖ Include verification of income in participant file.
	OR (if written third party documentation cannot be obtained)	
Oral verification of income. (Refer to Income Verification template provided by Homeless Coalition.)	<ul style="list-style-type: none"> ❖ Contact the source(s) by phone or in person to obtain oral verification of income. ❖ Document oral verification of income. ❖ Include HESG Verification of Income in participant file. 	

Type of Income	Acceptable Types of Documentation (in order of preference)	Documentation Requirements and Process
	<i>OR (if written documentation or oral third party verification cannot be obtained)</i>	
	Self-declaration of income. (Refer to Self-Declaration of Income template provided by Homeless Coalition.)	<ul style="list-style-type: none"> ❖ Obtain signed and dated original self-declaration of income from applicant. ❖ Must document attempt to obtain third party verification (written or oral) and sign self-declaration of income. ❖ Include self-declaration of income in participant file.
TANF/Public Assistance	Copy of most recent welfare payment statement or benefit notice	<ul style="list-style-type: none"> ❖ Obtain copy(ies) of most recent benefit notice(s) or payment statement(s) from applicant. ❖ Include copy(ies) in participant file.
	Or	
	Written verification of income. (Refer to Income Verification template provided by Homeless Coalition.)	<ul style="list-style-type: none"> ❖ Mail, fax or email verification of income request directly to the welfare administrator ❖ Obtain signed and dated verification of income from income source. ❖ Include verification of income in participant file.
	<i>OR (if written third party documentation cannot be obtained)</i>	
	Oral verification of income. (Refer to Income Verification template provided by Homeless Coalition.)	<ul style="list-style-type: none"> ❖ Contact the source(s) by phone or in person to obtain oral verification of income. ❖ Document oral verification of income. ❖ Include HESG Verification of Income in participant file.
	<i>OR (if written documentation or oral third party verification cannot be obtained)</i>	
	Self-declaration of income. (Refer to Self-Declaration of Income template provided by Homeless Coalition.)	<ul style="list-style-type: none"> ❖ Obtain signed and dated original self-declaration of income from applicant. ❖ Must document attempt to obtain third party verification (written or oral) and sign self-declaration of income. ❖ Include self-declaration of income in participant file.

Type of Income	Acceptable Types of Documentation (in order of preference)	Documentation Requirements and Process
Alimony, Child Support, Foster Care Payments	Copy of most recent alimony, foster care, child support or other contributions or gift payment statements, notice, or order	<ul style="list-style-type: none"> ❖ Obtain copy(ies) of most recent payment statement(s), notice(s) or order (e.g. court ordered child support) from applicant ❖ Include copy(ies) in participant file.
	Or	
	Written verification of income. (Refer to Income Verification template provided by Homeless Coalition.)	<ul style="list-style-type: none"> ❖ Mail, fax or email verification of income request directly to the child support enforcement agency, court liaison, or other source. ❖ Obtain signed and dated verification of income from income source. ❖ Include HESG Verification of Income in participant file.
	OR (if written third party documentation cannot be obtained)	
	Oral verification of income. (Refer to Income Verification template provided by Homeless Coalition.)	<ul style="list-style-type: none"> ❖ Contact the source(s) by phone or in person to obtain oral verification of income. ❖ Document oral verification of income. ❖ Include HESG Verification of Income in participant file.
	OR (if written documentation or oral third party verification cannot be obtained)	
Self-declaration of income. (Refer to Self-Declaration of Income template provided by Homeless Coalition.)	<ul style="list-style-type: none"> ❖ Obtain signed and dated original self-declaration of income from applicant. ❖ Must document attempt to obtain third party verification (written or oral) and sign self-declaration of income. ❖ Include self-declaration of income in participant file. 	
Armed Forces Income	Copy of pay stubs, payment statement, or other government issued statement indicating income amount	<ul style="list-style-type: none"> ❖ Obtain copy(ies) of most recent payment stub(s), statement(s), or other government issued statement from applicant. ❖ Include copy(ies) in participant file.

Type of Income	Acceptable Types of Documentation (in order of preference)	Documentation Requirements and Process
	Or	
	Written verification of income. (Refer to Income Verification template provided by Homeless Coalition.)	<ul style="list-style-type: none"> ❖ Mail, fax or email verification of income request directly to the appropriate armed services representative. ❖ Obtain signed and dated verification of income from income source. ❖ Include HESG Verification of Income in participant file.
	OR (if written third party documentation cannot be obtained)	
	Oral verification of income. (Refer to Income Verification template provided by Homeless Coalition.)	<ul style="list-style-type: none"> ❖ Contact the source(s) by phone or in person to obtain oral verification of income. ❖ Document oral verification of income. ❖ Include HESG Verification of Income in participant file.
	OR (if written documentation or oral third party verification cannot be obtained)	
Self-declaration of income. (Refer to Self-Declaration of Income template provided by Homeless Coalition.)	<ul style="list-style-type: none"> ❖ Obtain signed and dated original self-declaration of income from applicant. ❖ Must document attempt to obtain third party verification (written or oral) and sign self-declaration of income. ❖ Include self-declaration of income in participant file. 	
No Income Reported	Self-declaration of income. (Refer to Self-Declaration of Income template provided by Homeless Coalition.)	<ul style="list-style-type: none"> ❖ Obtain signed and dated original self-declaration of income from applicant. ❖ Must document attempt to obtain third party verification (written or oral) and sign self-declaration of income. ❖ Include self-declaration of income in participant file.

**Tampa/Hillsborough County CoC HESG Program
Housing Options/Resources Eligibility Documentation Standards**

Living Situation	Acceptable Types of Documentation (in order of preference)	Documentation Requirements and Process*
Other Subsequent Housing Options	Assessment form or other documentation (e.g. case notes) of housing options by HESG case manager or other authorized HESG staff	<ul style="list-style-type: none"> ❖ Assess with applicant all other appropriate (i.e. safe, affordable, available) subsequent housing options. ❖ Verify that no other appropriate subsequent housing options are available. ❖ Assessment Form or Other Documentation Must <ul style="list-style-type: none"> • Be documented by HESG case manager or other authorized staff. • Include assessment summary or other statement indicating that applicant has no other appropriate housing options. • Be signed and dated by HESG case manager or other authorized HESG staff. ❖ Include assessment indicating no other subsequent housing options in participant case file.
Financial Resources and Support Networks	Assessment form or other documentation (e.g. case notes) of financial resources and support networks by HESG case manager or other authorized HESG staff	<ul style="list-style-type: none"> ❖ Assess with applicant all financial resources and support networks (i.e. friends, family or other personal sources of financial or material support). ❖ Verify that applicant lacks financial resources and support networks to obtain appropriate subsequent housing options or remain in their housing. ❖ Assessment Form or Other Documentation Must <ul style="list-style-type: none"> • Be documented by HESG case manager or other authorized staff. • Include review of current account balances in checking and savings accounts held by applicant household. • Include assessment summary or other statement indicating that applicant lacks financial resources and support networks to obtain appropriate subsequent housing options or remain in their housing. • Be signed and dated by HESG case manager or other authorized HESG staff. ❖ Include assessment indicating insufficient financial resources and support networks in participant case file.

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