

**Employment and Housing Demonstration
Project for Low Income Individuals who are
Homeless or At-Risk of Homelessness and are
Living with HIV or AIDS**

Program Guide

May 2016



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I. Program Overview

A. Purpose of the Demonstration Project

The purpose of the demonstration project is to assist program participants in achieving economic and housing stability through housing counseling and employment services. The target population to be served by this demonstration project is adults who are living with HIV/AIDS, who are homeless or at-risk of homelessness, who are low income, and whose primary barrier to stability is economic. Due to the time-limited nature of services associated with this demonstration project, it is not intended to serve persons in need of long-term or permanent support services or rental assistance.

B. Background

The District of Columbia Department of Health, HIV/AIDS, Hepatitis, STD, and TB Administration (HAHSTA) recognizes that due to improved treatment options there has been a shift in health outcomes for persons living with HIV/AIDS since the start of the epidemic. This demonstration project is part of HAHSTA's effort to develop and implement new program models that more appropriately respond to the changing needs of the population it serves.

This demonstration project is intended to address the regional need among the target population. As such, grant funds awarded under this demonstration project may be used in the District of Columbia as well as the surrounding jurisdictions in the Washington, DC metropolitan region; indeed, grantees and subgrantees will be expected to make use of the regional housing market to help project participants find permanent housing placements that best meet their needs and financial circumstances. Additional information can be found in Section II, Target Population and Eligible Services.

C. Governing Legislation and Policies

Grantees and subgrantees are required to comply with The Community Partnership for the Prevention of Homelessness' (TCP) policy on serving transgender and gender nonconforming clients (Appendix I), the District of Columbia's Language Access Act of 2004 (Appendix J), and the Americans with Disabilities Act of 1990 (Appendix K). Additional guidance, policies, and regulations related to the demonstration project may be implemented at the discretion of TCP and/or HAHSTA.

II. Target Population, Eligible Services, Assistance Types, and Rent Reasonableness

A. Target Population

The population to be served by this demonstration project is unaccompanied, low income adults, age 18 years and older, who are homeless or at-risk of homelessness, and who are living with HIV/AIDS. Additional information pertaining to verification of homelessness status and income eligibility can be found in Section III, Participant Eligibility and Assessment.

B. Eligible Services

1. Support services: Support services provided to program participants are intended to assist them with securing units of permanent housing and sufficient income from employment to enable them to retain housing after assistance ends. Grantees and subgrantees are expected to develop a menu of support services that will best meet the needs of the target population; however, all program participants must receive employment services and housing counseling services. This demonstration project is not intended to provide medical case management or any other health care or medical services. Grantees and subgrantees are expected to connect program participants in need of such services (as well as any other services that are beyond the scope of the demonstration project) with the appropriate mainstream resources, community resources, medical case managers, and/or health care providers.

Program participants may receive support services for a period not to exceed 24 months. However grantees and subgrantees should not operate this demonstration project like 2-year transitional housing nor should they state to clients or prospective clients that they will receive 24 months of assistance. Rather, grantees and subgrantees are expected to continually engage and assess clients to determine their changing needs and the appropriate service level needed to address those needs; services should decrease as a client's stability in housing, income, and ability to be responsible for their housing increases. Clients who have achieved housing stability and secured sufficient income to retain their housing without further assistance in a period that is shorter than 24 months should be exited from the program. The following support services are eligible under this demonstration project:

- a. **Outreach:** Conducting outreach is a critical component of the work of grantees and subgrantees and must be customized to the target population being served by the demonstration project. An effective outreach plan will be informed by an understanding of the Washington, DC metropolitan regional housing market and available resources in the specific jurisdictions in which support services will be provided. There are two parts to the provision of outreach services: 1.) identifying individuals in the demonstration project target population; and 2.) screening them to determine eligibility for services.
- b. **Employment Services:** Structurally, employment services are central to this demonstration project. All clients served must receive employment services and be actively engaged in securing sufficient income from employment to retain housing after

assistance ends. Grantees and subgrantees must work with each program participant to develop an employment plan and hold participants accountable for meeting agreed upon milestones and deliverables.

- c. **Housing counseling:** Ongoing housing counseling services are necessary to effectively assist participants by creating individualized housing plans that address individual needs and barriers to stability. When a program participant needs to be placed in housing or relocated to more appropriate or affordable housing, housing navigation services must be incorporated into housing counseling services.
- d. **Service coordination:** service coordination provided in this demonstration project are dedicated to assessing and reassessing needs, educating participants on community resource opportunities, coordinating employment and housing plans, providing necessary follow up to ensure employment and housing plans are progressing on schedule and that clients' needs are adequately being addressed by the grantee or subgrantee.

2. Financial services: Financial services provided to program participants are time limited and should be used strategically to cover costs associated with the process of securing, moving into, and retaining housing units and/or gaining employment. Eligible financial services must be reasonable and must be a demonstrated part of the plan to address program participants' future ability to pay their own expenses. Financial assistance must always augment the grantee's or subgrantee's support services. Meaning grantees and subgrantees may only provide financial services to persons who are engaged in support services.

Program participants may receive financial services for up to 24 months. However grantees and subgrantees should not operate this demonstration project like 2-year transitional housing nor should they state to clients or prospective clients that they will receive 24 months of assistance. Rather, grantees and subgrantees are expected to continually engage and assess clients to determine their changing needs and the appropriate service level needed to address those needs; services should decrease as a client's stability in housing, income, and ability to be responsible for their housing increases. Clients who have achieved housing stability and secured sufficient income to retain their housing without further assistance in a period that is shorter than 24 months should be exited from the program. Payments should not be made to program participants rather they should be made to the appropriate third party (i.e. landlord, utility company, etc.)

The following financial services are eligible under this demonstration project:

- a. **Security deposits:** Security deposit assistance may only be provided if the provision of such assistance will directly allow the participant to obtain permanent housing. The grantee or subgrantee must work with the participant to develop and implement a reasonable plan to stabilize housing so that additional deposits are not needed. If the grantee or subgrantee cannot help the program participant to develop a reasonable plan to address the participant's future housing stability, demonstration project grant funds may not be used to provide deposit payment assistance. Grantees and subgrantees have discretion to determine how to handle security deposits if and when an assisted program participant moves from the assisted unit (assuming the landlord has not retained the deposit to pay for damages incurred by the tenant). The grantee may

recover the security deposit (in which case it must be treated as program income) or the grantee may allow the program participant to keep the deposit and use it towards their next unit.

- b. **Utility deposits:** Utility deposit assistance may only be provided if the provision of such assistance will directly allow the participant to obtain permanent housing. The grantee or subgrantee must work with the participant to develop and implement a reasonable plan to stabilize housing so that additional deposits are not needed. If the grantee or subgrantee cannot help the participant to develop a reasonable plan to address the participant's future housing stability, demonstration project grant funds may not be used to provide deposit payment assistance.
- c. **Moving costs:** Moving costs assistance includes costs necessary to help the participant obtain permanent housing. Moving costs may include reasonable costs such as truck rental, hiring a moving company, or short-term storage fees for a maximum of 3 months or until the participant is in permanent housing, whichever is shorter. Relocation transportation expenses such as bus, train or plane tickets are not allowable moving costs.
- d. **Rental assistance:** Rental assistance includes the payment of rent and penalties or fees to help a participant remain in or obtain permanent housing. (Note: Where a rental fee is inclusive of utilities, the entire amount will be considered "rental assistance" and will be subject to the applicable conditions). Rental assistance payments can be provided for amounts that are currently due (including first month or prorated rent paid prior to or at move in) or that are in arrears, and for the payment of penalties or fees that have been incurred by the participant and are required to be paid under an existing lease or court order. Such allowable fees are typically late rent fees that are paid directly to a landlord.
- e. **Utility assistance:** Utility assistance includes the payment of utility costs (i.e. heat, electricity, water, sewer and garbage collection) to help the participant obtain or retain permanent housing. Utility assistance may consist of payments for multiple types of utilities. Telephone or cell phone services are not eligible expenses. Utility assistance can be provided for amounts that are currently due or are in arrears. Amounts owed for telephone, cable, and other utilities not listed above are not eligible. Grantees and subgrantees should require program participants to share in the cost of utility payment to the maximum extent possible as a condition of receiving assistance; grantees and subgrantees.

Program participants will be required to contribute 30% of their income to rent and utilities as a condition of receiving assistance. Program participants are required to report income to grantees and subgrantees at the time of application for services; they will also be required to report changes income within 30 days of the change. Grantees

and subgrantees are required to document income in the Homeless Management Information System (HMIS). Grantees and subgrantees are also encouraged to negotiate with landlords and utility companies to waive fees, security deposits, and accept partial payments to satisfy arrearages whenever possible. In this way, grantees conserve demonstration project grant funds for future use and also empower participants to share in the responsibility. Grantees should determine the level of assistance provided on a case-by-case basis, based on the minimum amount needed to prevent the program participant from becoming homeless or returning to homelessness in the near term.

- f. **Employment assistance:** Demonstration project grant funds may be used to assist program participants with the purchase of expenses related to securing employment, such as the purchase of tools, equipment, clothing, licensures, certifications, background checks, or police clearances.

Table 1. Eligible Services

| Service/Activity | Documentation | Associated Restrictions |
|------------------------------------|--|---|
| Security deposits/Utility deposits | <ul style="list-style-type: none"> • Written statement, notice, invoice, or bill from the property landlord/manager or utility company that deposit is required. In cases where water and power are not included in rent and are billed separately, this is to be included in the statement or the property landlord/manager • Signed lease or utility agreement • Housing Quality Standards (HQS) inspection | <ul style="list-style-type: none"> • Security deposit assistance limited to one time during the 2-year (24 month) period • Utility deposit assistance limited to one time during the 2-year (24 month) period • Approved deposits do not count toward maximum rental assistance limitations • Security deposits must be paid to the property landlord/manager • Utility deposits must be paid to the appropriate utility company |
| Moving costs | <ul style="list-style-type: none"> • Invoice, bill, or written statement for: moving costs, short-term storage fees | <ul style="list-style-type: none"> • Maximum of one time during a 2-year (24 month) period • Short-term storage for a maximum of 3 months or until participant is in permanent housing, whichever is shorter • Payments for moving costs must be paid to the appropriate vendor |

| | | |
|--------------------------|--|---|
| <p>Rental assistance</p> | <ul style="list-style-type: none"> • HQS Inspection • Copy of payment demand from landlord/management company clearly identifying participant and unit • Document indicating participant's portion of rent • Signed lease • W9 from landlord required for payment • Writ of eviction | <ul style="list-style-type: none"> • Rental assistance may be provided for a period not to exceed 24 months however, grantees and subgrantees are required to assess clients on an ongoing basis to determine the appropriate duration of rental assistance • Eligible for payments currently due or in arrears (Number of months in arrears paid for with rental assistance counts toward the maximum allowable months of assistance) • Penalties or fees must be reasonable and must directly allow participant to obtain/remain in permanent housing • In compliance with rent reasonableness • Rental assistance must be paid to the property landlord/manager |
| <p>Shared Housing</p> | <ul style="list-style-type: none"> • Signed lease for each shared housing participant. The lease must indicate that the failure of one tenant to comply with the terms of his lease will not jeopardize the housing of other tenants. | <ul style="list-style-type: none"> • Participation in shared housing arrangement must be voluntary • Each participant in a shared housing arrangement must have a lease agreement in in his or her name so that one member of the arrangement is not unjustly affected by the actions of another person in the arrangement • Rent charged for a participant must be proportional to the size of the participant's private space in comparison to other private space in the unit • Rental assistance and or utility payment assistance may be provided for a period not to exceed 24 |

| | | |
|-------------------------------|--|---|
| | | <p>months; however, grantees and subgrantees are required to assess clients on an ongoing basis to determine the appropriate duration of rental assistance</p> <ul style="list-style-type: none"> • Rental assistance must be paid to the property landlord/manager |
| Utility payment assistance | <ul style="list-style-type: none"> • HQS Inspection • Copy of utility bill, itemized by month • Proof that participant is responsible for payment • Receipt of payment | <ul style="list-style-type: none"> • Utility payment assistance may be provided for a period not to exceed 24 months; however, grantees and subgrantees are required to assess clients on an ongoing basis to determine the appropriate duration of rental and utility assistance • Eligible for payments currently due or in arrears • Participant, legal representative or a member of the household must have an account in his/her name with a utility company or proof of responsibility to make payments • Utility assistance must be paid to the appropriate utility company |
| Employment related assistance | <ul style="list-style-type: none"> • Receipt, invoice, or bill for the employment items purchased | <ul style="list-style-type: none"> • Employment related assistance limited to one time during 2-year period or as otherwise determined reasonable by the grantee for the purposes of attaining or retaining employment • Employment assistance must be paid to the appropriate vendor |

3. Other required activities: Grantees and subgrantees will also be required to conduct the following service related activities:

- a. Develop and implement an outreach plan to locate and engage new clients;
- b. Assessment of prospective program participants for eligibility (Additional information provided in Section II);
- c. Secure housing units for homeless clients through outreach to community landlords;
- d. Document persons served, service plans, and services provided in the Homeless Management Information System (HMIS) (Additional information provided in Section IV).

C. Assistance Types

Program participants may be served in the demonstration project in one of two categories:

- **Category 1** - Homeless prevention: Prevent individuals at risk of homelessness from becoming homeless.
- **Category 2** - Housing placement assistance: Assist individuals experiencing homelessness to become housed and stabilized as quickly as possible.

All program participants served in either category are eligible for all of the supportive services and financial services offered through this demonstration project.

Additionally, given that this demonstration project is intended to serve the target population throughout the Washington, DC metropolitan region, grantees and subgrantees may provide assistance and services in the following ways:

1. Clients may sign leases for housing units in a jurisdiction outside of the District of Columbia, within the Washington, DC metropolitan region;
2. Grant funds may be used to pay clients' rents and utilities in a jurisdiction outside of the District of Columbia, within the Washington, DC metropolitan region;
3. Providers may serve multiple jurisdictions, so long as the catchment area includes the District of Columbia; and
4. Providers may operate offices in multiple jurisdictions.

D. Rent Reasonableness

Rent reasonableness in the context of this demonstration project is defined as meaning that the total rent charged for a unit must be reasonable in relation to the rents being charged during the same time period for comparable units in the private unassisted market and must not exceed rents charged by the property owner during the same time period. For the purposes of this demonstration project, rent reasonableness is defined according to the 2015 HUD Fair Market Rate (FMR); see Appendix G.

III. Participant Eligibility and Assessment

A. Eligibility Criteria

The following criteria are used to determine consumer eligibility for assistance and services in this demonstration project:

- a. Diagnosis of HIV or AIDS;
- b. Unaccompanied adult, age 18 years or older;
- c. Documented household income not to exceed 50% of the Area Median Income (AMI) adjusted per household size;
- d. The provider must be able to demonstrate a reasonable expectation that clients served will be able to retain their units of housing after assistance ends; and
- e. The provider must be able to demonstrate a reasonable expectation that potential clients are able and willing to seek and maintain employment.

B. Reasonable Expectation

For the purposes of this demonstration project, the term, “reasonable expectation,” is defined as the degree to which grantees and subgrantees can demonstrate a client’s ability and willingness to seek and maintain housing and employment and assumes that clients will be ready to develop and improve workforce skills immediately upon program entry. This determination is critical in assessing eligibility for this project. For instance, persons who meet the definition of chronic homelessness and/or qualify to receive permanent supportive housing are not included in the population eligible to receive services through this demonstration project due to the depth and number of barriers to housing stability and the intensity of service needed to adequately address their needs. Due to the time-limited nature of services associated with this demonstration project, it is not intended to serve persons in need of long-term support services and/or rental assistance beyond the 24 month assistance limit.

C. Homelessness Verification

Homeless under this demonstration project is defined according to the United States Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act as:

(1) Individual who lacks a fixed, regular, and adequate nighttime residence, meaning:

(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); or

(iii) Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitations immediately before entering that institution.

The process of determining a potential program participant's homeless status requires grantees and subgrantees to assess and document the criteria stated above. The following forms of documentation and recordkeeping are acceptable in determining client's homeless status:

- a. Written observation by the outreach worker; **or**
- b. Written referral by another housing or service provider; **or**
- c. Certification by the individual seeking assistance stating that (s)he was living on the streets or in shelter; **or**
- d. Verification by intake worker through HMIS, certifying history of homelessness and record of shelter stay;
- e. For individuals exiting an institution – one of the forms of evidence above **and**: discharge paperwork or written/oral referral, **or** written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited institution

D. At-Risk of Homelessness (“But For” Assistance)

For the purposes of this demonstration project, the term, “at-risk of homelessness,” is defined to be:

(1) Individual who will imminently lose their primary nighttime residence and of which

(i) No subsequent housing options have been identified;

(ii) The individual lacks the financial resources to remain in or obtain immediate and stable housing; and

(iii) The individual lacks the necessary support networks needed to remain in or obtain immediate and stable housing.

Grantees and subgrantees are thus required to work with program participants to assess and document their circumstances in order to determine that the individual would in fact become homeless “but for” the assistance provided through the demonstration project. This includes assessing and documenting a prospective client's support networks and financial resources and other housing options. To ensure program compliance, client case files and HMIS profiles should include case notes and other appropriate documentation that demonstrate the grantee or subgrantee has assessed the client's other financial resources, support networks, and subsequent housing options.

E. Income Eligibility

All participants served under this demonstration project must be low-income individuals with a documented gross annual income that is at or below 50 percent of the Area Media Income (AMI) as defined by HUDs FY2015 Income Limits Documentation System; see Appendix F.

Given the focus on employment and income development through this demonstration project, determination of income eligibility is required for all participants applying for assistance and must be documented in the client's case files and corresponding HMIS assessments and updates to ensure program compliance. Documentation of income for program participants includes the distinction between verifiable sources and sources of income not to be included in the calculation of gross annual income for the purposes of determining program eligibility.

Table 2. Source of Income

| Verifiable Sources of Income |
|--|
| • Earned Income |
| • Self-Employment/Business Income |
| • Interest & Dividend Income |
| • Pension/Retirement Income |
| • Unemployment & Disability Income |
| • TANF/Public Assistance |
| • Alimony, Child Support and Foster Care Income |
| • Armed Forces Income |
| Non-verifiable Sources of Income (excluded from income calculation) |
| • Income of Children |
| • Inheritance and Insurance Income |
| • Medical Expense Reimbursements |
| • Income of Live-in Aides |
| • Disabled Persons |
| • Student Financial Aid |
| • Armed Forces Hostile Fire Pay |
| • Self-Sufficiency Program Income |
| • Other Income (i.e. temporary, non-recurring or sporadic income) |
| • Reparations |
| • Income from full-time students |
| • Adoption Assistance Payments |
| • Deferred and Lump Sum Social Security & SSI Payments |
| • Income Tax and Property Tax refunds |
| • Home Care Assistance |
| • Other Federal Exclusions |

IV. Reporting Requirements

A. Homeless Management Information System (HMIS) Requirements

Grantees and subgrantees are required to use the web-based District of Columbia Homeless Management Information System (HMIS) to capture client level data on all persons served. HMIS use shall include the maintenance of sufficient computer hardware and internet access for all relevant staff persons to enter client level data into the HMIS. The provider will ensure that its client level data is entered into the HMIS in an accurate and timely manner. Grantees and subgrantees are required to comply with all Federal HMIS Data and Technical Standards as well as TCP's HMIS Standard Operating Procedures.

TCP uses HMIS data entered by grantees and subgrantees to conduct analysis of clients served to complete all reporting required by the District and Federal Governments. Grantees and subgrantees will ensure that its client level data is entered into the HMIS in a manner that is accurate, timely, and in accordance with the most recent HUD Data Standards and TCP direction on a regular and ongoing basis.

All computers used to access the HMIS must have the ability to connect to the internet and must be in view of the TCP's Privacy Policy. TCP will use HMIS data entered by the service provider to conduct analysis of program activities and outcomes as well as to complete all reporting required by the District and Federal Governments.

B. Monthly Performance Reports

Grantees and subgrantees will be required to complete a monthly HMIS-generated performance report and coversheet that will be submitted to TCP on the 5th business day of each month. This report will be used by TCP to produce a monthly report to HAHSTA that will be submitted by the 15th day of each month. A sample of the monthly performance report can be found as Appendix A of this document.

C. Client Satisfaction Surveys

Grantees and subgrantees must ensure that clients served in this demonstration project have the opportunity to provide input about their satisfaction with program services. Grantees and subgrantees must administer, twice annually, anonymous "Client Satisfaction Surveys" which allows program participants to provide comments and feedback on the program. Results from the first survey shall be submitted to TCP on or before February 11th. The second survey results shall be submitted on or before August 11th. Grantees and subgrantees are required to maintain copies of Client Satisfaction Surveys in a manner that protects the anonymity of clients and their responses. A sample of the Client Satisfaction Survey can be found in Appendix D of this document.

Grantees and subgrantees will be required to generate a report on findings from the client satisfaction surveys. This report must address areas of client dissatisfaction and the grantee's or subgrantee's plan to improve client experience and client outcomes. This report must be submitted to TCP on or before February 24 and on or before August 25.

D. Housing & Participant Assessment Reports

Housing and Participant Assessment Reports will be completed by grantees and subgrantees for each housing unit funded under this demonstration project and will be confirmed by signature of staff and client. Housing and Participant Assessment Reports must be submitted to TCP on the 15th day of the month of each month during the contract period as evidence of compliance with HUD Housing Quality Standards. The Housing and Participant Assessment Report can be found in Appendix H.

E. Point in Time

The Point in Time (PIT) is an annual census and survey of persons experiencing homelessness in the District of Columbia in accordance with the U.S. Department of Housing and Urban Development's (HUD) reporting standards.

Grantees and subgrantees providing services in jurisdictions outside of the District of Columbia will be responsible for submitting data for inclusion in those jurisdictions' PIT counts.

F. Homeless Youth Census

The Homeless Youth Census is an annual census and survey of unaccompanied minors and transition age youth (TAY) (persons under the age of 25) experiencing homelessness in the District of Columbia. The Homeless Youth Census is mandated through the End Youth Homelessness Act passed by the Council of the District of Columbia in 2014.

TCP uses HMIS data entered by grantees and subgrantees to conduct analysis of clients served to complete all reporting required by the District and Federal Governments. Grantees and subgrantees will ensure that its client level data is entered into the HMIS in a manner that is accurate, timely, and in accordance with the most recent HUD Data Standards and TCP direction on a regular and ongoing basis.

G. Annual Homeless Assessment Report to Congress

The Annual Homeless Assessment Report (AHAR) is a report submitted by the U.S. Department of Housing and Urban Development to the U.S. Congress. The AHAR provides nationwide estimates of homelessness, including information about the demographic characteristics of homeless persons,

service use trends, and the capacity of communities to house homeless persons. The report is based primarily on HMIS data for any persons who experience homelessness during a 12-month period.

TCP uses HMIS data entered by grantees and subgrantees to conduct analysis of clients served to complete all reporting required by the District and Federal Governments. Grantees and subgrantees will ensure that its client level data is entered into the HMIS in a manner that is accurate, timely, and in accordance with the most recent HUD Data Standards and TCP direction on a regular and ongoing basis.

TCP and/or HAHSTA may implement additional reporting requirements to better understand the population and effectiveness of service delivery.

V. Performance Measures and Evaluation

A. Client Outcomes

The purpose of this demonstration project, as indicated in Section I. Program Overview, is to assist program participants to achieve economic self-sufficiency and housing stability through housing counseling and employment services. Thus, the primary client outcomes, which will be used in measuring program effectiveness, are stability in permanent housing and attainment of sufficient income from employment to retain housing when assistance ends. The goals, performance indicators, services model, and proposed outcomes stated in the grantee's or subgrantee's scope of work will also be used to evaluate program outcomes.

B. Program Monitoring and Audits

1. Program Monitoring

a) Grantees and subgrantees under this demonstration project will be monitored and evaluated by TCP and/or HAHSTA according to the details of the scope of work and performance objectives outlined in the contract document in addition to the requirements included throughout this program guide. TCP and HAHSTA will have access to the work being performed under this demonstration project, wherever it may occur. Additionally, TCP and/or HAHSTA will review program data, observe program operations, interview staff and program participants, examine program and financial records regarding the contract, and review records regarding volunteer hours, in-kind contributions, or cash resources which the applicant has declared as part of their leveraged resources for accomplishing program objectives.

2. Financial Audits

a) Grantees and subgrantees are expected to maintain complete and accurate records substantiating all actual expenditures, leaving a clear audit trail to the point of origin. TCP, HAHSTA, and the Government of the District of Columbia may have the grantee's or subgrantee's financial and program records audited at any time during the period of the grant or for three years thereafter. Any contract payments found not to have been spent on eligible and allowable program purposes shall be returned to TCP.

b) Grantees and subgrantees are also required to have an annual independent audit conducted of the program of which the costs associated are expected to be included in the administrative or indirect cost portion of the contracted budget.

- c) Grantees and subgrantees shall maintain an accounting system that conforms to generally accepted accounting principles (GAAP) which will permit an audit of all income and expenditures received or disbursed by the grantee or subgrantee in the provision of services under contracts issued pursuant to this demonstration project. Accounting records shall be supported by source documentation such as canceled checks, original invoices, payroll records and the like.
- d) Grantees and subgrantees shall submit to TCP a Certified Audited Financial Statement within 10 days of receipt of that audit from a Certified Public Accounting Firm. Grantees and subgrantees shall complete the "Audit Information Request Form" and return it to TCP with the signed contract. If the audit has not been completed within 90 days of the end of the grantee's or subgrantee's fiscal year, a letter with a verifiable explanation indicating the estimated completion date of the audit is due to TCP 90 days after the end of the grantee's or subgrantee's fiscal year. If the audit is not completed within 9 months of the end of the fiscal year, the grantee or subgrantee may be subject to contract sanctions.
- e) Grantees and subgrantees are subject to external auditing by TCP or by the District of Columbia and its representatives and shall upon request make provisions for inspection of financial records, including audited and financial statements and tax returns
- f) Grantees and subgrantees that receive annually a combination of federal funds in excess of \$750,000.00), are required to have a Single Audit (Formerly A-133) audit conducted and submitted to TCP within 30 days of the completion of the fiscal year. If Single Audit has not been completed within 90 days of the end of the grantee's or subgrantee's fiscal year, a letter with an acceptable explanation indicating the estimated completion date of the Single Audit is due to TCP (an audit information request form can be found on TCP's website)
- g) At any time before final payment and three (3) years thereafter, TCP, HAHSTA, or the Government of the District of Columbia may initiate an audit of expenditures related to this demonstration project. Any expenditure disallowed by the audit, and/or other Partnership review, shall be subject to repayment by the grantee or subgrantee to TCP

Grantees and subgrantees are required to submit audited financial statements within 30 days of receipt of the final report from the auditors. More information on single audits can be found at: <http://www.federalregister.gov/articles/2013/12/26/2013-30465/uniform-administrative-requirements-cost-principles-audit-requirements-for-federal-awards>.

VI. Program Operations and Administration

A. Staff Requirements

Grantees and subgrantees are expected maintain a competent staff for the purposes of delivering services with special regard to the target population and all subpopulations served; including but not limited to limited- or non-English proficient persons, race and/or ethnicity, gender (including individuals who are transgender or gender nonconforming, and regardless of gender expression) or sexual orientation, and all other populations and subpopulations served. All personnel relevant to the services of this program are expected to possess the requisite training, qualifications and competence necessary to perform the duties to which they are assigned.

A staffing plan is required under this demonstration project to indicate how grantee and subgrantee staff will be deployed to conduct:

- Program management and oversight;
- Program reporting;
- Program monitoring and evaluation;
- New client outreach;
- Screening for eligibility of prospective clients;
- Ongoing case management service (including a client to staff ratio);
- Employment assistance (including a client to staff ratio); and
- Housing counseling and housing navigation services.

Additionally, grantees and subgrantees must designate at least one staff member as the HMIS Agency Administrator. The Agency Administrator(s) shall serve as TCP's primary contact person(s) for HMIS as well as all other data reporting issues with the expectation that this person(s) will disseminate information to all relevant staff persons. The Agency Administrator(s) is responsible for ensuring all agency HMIS-users are properly trained on all data entry requirements, client level data is updated on a regular and ongoing basis, any system issues are communicated to TCP.

Grantees and subgrantees shall maintain an individually locked personnel file for each staff person, that contain the application for employment, resumes, professional and personal references, background checks, applicable credentials and certifications, documentation of all training received, an annual evaluation for the current or preceding year, and notation of any allegations of professional misconduct including documentation of grantees and subgrantees' actions with respect to such misconduct, and documentation of a current tuberculosis test. In the event of staff termination, the date and cause(s) for termination of employment shall be placed in the file.

If a grantees or subgrantee chooses to maintain personnel files in an electronic system, the following conditions apply:

Grantees and subgrantees must ensure that the electronic filing system allows for ease of retrieval.

Grantees and subgrantees must establish security protocols that ensure only authorized individuals can access each electronically maintained file. This includes creating a secure and reliable electronic storage environment, including off-site backup, and complete and secure destruction protocols consistent with the retention policy for hard copies.

If the electronic storage technology does not have the capacity to self-audit or contain compliance monitoring, grantees and subgrantees must implement a quality assurance protocol which includes regular evaluations and checks of the electronic record-keeping system.

Grantees and subgrantees must retain paper copies of any records that cannot be clearly, accurately, or completely transferred to an electronic record-keeping system.

TCP and HAHSTA will have access to all staff records at all times.

B. Program Operations

Grantees and subgrantees under this demonstration project are permitted to conduct services in multiple jurisdictions within the Washington, DC metropolitan region as part of the regional effort to serve the target population. Grantees and subgrantees are required to indicate the anticipated locations of service delivery and the location of program administrative offices in the application for funding, in the scope of work narrative, and in the contract issued through this demonstration project. Allowable services for grantees and subgrantees across multiple jurisdictions are outlined in Section II. C. Assistance Types.

Further, grantees and subgrantees are expected to maintain a system of internal controls that provide for reasonable assurance that the entity is managing the contract in compliance with Federal statutes, regulations and the terms and conditions of the contract. At a minimum, grantees and subgrantees must:

- (a) Evaluate and monitor the non-Federal entity's compliance with statutes, regulations and the terms and conditions of Federal awards.
- (b) Take prompt action when instances of noncompliance are identified including noncompliance identified in audit findings.
- (c) Take reasonable measures to safeguard protected personally identifiable information and other information the Federal awarding agency or pass-through entity designates as sensitive or the non-Federal entity considers sensitive consistent with applicable Federal, state, local, and tribal laws regarding privacy and obligations of confidentiality. (OMB Uniform Guidance 2 CFR §200.303)

C. Recordkeeping Requirements

The provider must create and maintain confidential records regarding each person served by their program and must display TCP's standard Privacy Notice in a visible and clear place. Case management files are to be the primary form of record keeping, supplemented by the HMIS record keeping requirements as stated in the section above.

Grantees and subgrantees are expected to be in compliance with the Health Insurance Portability and Accountability Act (HIPAA) of 1996 and its privacy regulations governing individually identifiable health information.

VII. Appendices

- A. Monthly Performance Report (MPR)**
- B. Annual Performance Report (APR)**
- C. Budgeting and Invoicing Manual**
- D. Client Satisfaction Survey**
- E. Contract Deliverable Requirements**
- F. Income Limits (IL) by Jurisdiction**
- G. Fair Market Rate (FMR) by Jurisdiction**
- H. Housing & Participant Assessment Report**
- I. TCP Transgender & Gender Nonconforming Policy**
- J. District of Columbia Language Access Act of 2004**
- K. Americans with Disabilities Act of 1990**