

Housing First Program Desk Guide FY2016



Strength, Dignity, Quality of Life
MISSOURI HOUSING
DEVELOPMENT COMMISSION



**EQUAL HOUSING
OPPORTUNITY**

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Introduction

Purpose

The objective of the Housing First Program (HFP) is to provide funding for housing and service providers proposing permanent housing solutions to address the needs of homeless and chronically homeless persons. It is the purpose of the HFP to serve those with the greatest housing and housing service needs in the state of Missouri with attention given to the lowest-income residents.

History

In FY 2012, Missouri Housing Development Commission (MHDC) dedicated \$420,000.00 in Fund Balance monies to implement the HFP. The funding level remains at \$420,000.00 in FY 2016. It is the goal of MHDC to continue the HFP through the Fund Balance budget.

Eligibility Requirements

What is the Housing First model?

Housing First is a model that relieves homeless persons of stipulations and barriers and emphasizes immediate access to permanent housing. Once housed, case management and supportive services tailored to the needs of the individual or household should be offered. This model emphasizes that housing is and should remain the central focus and supportive services are more effective when individuals and families are stably housed. Housing is not reliant on involvement or compliance with services. Housing First recipients are not obligated to participate in case management, services, and/or treatment in order to receive housing assistance; instead, they simply need to abide by the requirements of their standard lease agreement. Housing is not a reward for completing a task or program. Housing should be provided first and services to maintain the housing second.

Agencies following a Housing First approach will have diverse program models depending on the client population, community needs, and availability of resources including funding, housing, and supportive services. While the approach varies among different programs, there are core components essential to the Housing First model, including:

- Quick access to housing that is not time-limited;
- Services that encourage housing stability;
- Voluntary participation of recipients in programs and services;
- Collaboration with recipients, service providers, landlords, and other community resources for efficient and effective service delivery;
- Ongoing support for recipients as requested; and,
- Recipient-directed assistance in accessing housing as well as agency and community resources and services.

Who can be served?

Any person, or persons (families) who are literally homeless or fleeing/attempting to flee domestic violence and who are at or below 50 percent of the area median income. The HFP provides a link between housing and services; however, the recipient is not obligated to receive case management or treatment in order to receive Housing First assistance. Please see [Homeless Status Definitions](#) for further information.

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Eligible Uses

The HFP does not have to be a standalone entity; it may be integrated into existing systems and programs. Eligible uses include rental assistance, rental deposits, rental arrears (up to six months), utility assistance, utility deposits, utility arrears (up to six months), and administrative expenses.

Funding Regions

HFP funds must be used in the region(s) specified in the agency's grant agreement. The HFP regions are defined by Missouri's Continuum of Care.

Funding Regions for the 2016 Grant Cycle

Allocation Areas
Balance of State Adair, Atchison, Audrain, Barry, Barton, Bates, Benton, Bollinger, Boone, Butler, Caldwell, Callaway, Camden, Cape Girardeau, Carroll, Carter, Cass, Cedar, Chariton, Clark, Clay, Clinton, Cole, Cooper, Crawford, Dade, Dallas, Daviess, Dent, Douglas, Dunklin, Gasconade, Gentry, Grundy, Franklin, Harrison, Henry, Hickory, Holt, Howard, Howell, Iron, Jefferson, Johnson, Knox, Laclede, Lafayette, Lawrence, Lewis, Linn, Livingston, Macon, Madison, Maries, Marion, McDonald, Mercer, Miller, Mississippi, Moniteau, Monroe, Montgomery, Morgan, New Madrid, Nodaway, Oregon, Osage, Ozark, Pemiscot, Perry, Pettis, Phelps, Pike, Platte, Polk, Pulaski, Putnam, Ralls, Randolph, Ray, Reynolds, Ripley, Saline, Schuyler, Scotland, Scott, Shannon, Shelby, St. Clair, St. Francois, Ste. Genevieve, Stoddard, Stone, Sullivan, Taney, Texas, Vernon, Washington, Wayne, Worth, and Wright Counties
Jasper/Newton County
Kansas City/Independence/Lee's Summit/Jackson County
Springfield/Greene, Christian, Webster Counties
St. Charles, Lincoln, and Warren Counties
St. Joseph/Andrew, Buchanan, DeKalb Counties
St. Louis City
St. Louis County

General Information

Website

All information and forms pertaining to the FY2016 Housing First grant can be found on MHDC's website at: <http://www.mhdc.com/ci/hfp/index.htm>

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Contacts

Please direct questions, concerns, updates, and miscellaneous submissions to:

Joselyn Pfliegier
Community Initiatives Coordinator
920 Main, Suite 1400
Kansas City, MO 64105
(816) 759-7228
jpfliegier@mhdc.com

Please submit electronic Payment Requests (HFP-102) and Back-Up (HFP-103) forms to*:

Community Initiatives Accountant
ci.accounting@mhdc.com

OR

Please submit hard-copy Payment Requests and Back-up forms to:

Missouri Housing Development Commission
Community Initiatives Department
920 Main, Suite 1400
Kansas City, MO 64105

*Agencies should not send both a hard copy and an electronic copy to avoid processing duplicates.

Timeline – FY2016

Proposal Deadline:	September 4, 2015
Commission Approval:	December 4, 2015
Funded Training:	March 2, 2016
Grant Year Begins:	April 1, 2016
Quarter 1 (Q1):	April 1, 2016-June 30, 2016
Q1 Payment Request Deadline (MHDC-KC office):	June 30, 2016
Quarter 2 (Q2):	July 1, 2016-September 30, 2016
Q2 Payment Request Deadline (MHDC-KC office):	September 30, 2016
Quarter 3 (Q3):	October 1, 2016-December 31, 2016
Q3 Payment Request Deadline (MHDC-KC office):	January 2, 2017
Quarter 4 (Q4):	January 1, 2017-March 31, 2017
Q4 Payment Request Deadline (MHDC-KC office):	March 31, 2017
Last Day to Expend Funds:	March 31, 2017
Final Payment Request Deadline (MHDC-KC office):	March 31, 2017, 5:00 p.m.
Final Back-up forms Deadline (MHDC-KC office):	April 30, 2017, 5:00 p.m.
Grant Close Out Deadline:	April 30, 2017

Financial Processes

Request for Payment

Before any funds can be released for FY2016 grants, the following criteria must be met:

1. All previous HFP grants must be completely closed out:

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- a. All previous HFP grant funds expended and fully backed up; and
- b. Close out documentation received.
2. All current year grant documents are completed and received.
3. All previous compliance issues are resolved (i.e., grantee is “in compliance”).

Once all of the above criteria are met, grantee may request FY2016 funds using the Request for Payment form (HFP-102). Receiving funds for your HFP grant is split into two processes: Request for Payment and Back-Up. This is split into two processes to allow grantees to advance up to 25 percent of their grant award throughout the year. The first Request for Payment may be processed without Back-Up for up to 25 percent of the grant. This amount must be backed-up before another Request for Payment can be submitted. The subsequent Requests for Payment may be advanced in an amount up to 25 percent, but the amount of the Request for Payment must be backed-up before another Request for Payment can be submitted. At no time can a grantee request more than 25 percent of the grant unless it is accompanied by Back-Up at the time of Request. Once any amount of funds is advanced, that amount must be backed-up before any further funds will be released.

Request for Payment Example

Grantee’s total grant award is \$25,000. Twenty-five percent of the total grant award is \$6,250; therefore, this is the maximum amount that MHDC will advance to grantee upon receipt of the Request for Payment. Once advanced these funds, grantee will need to submit back-up totaling \$6,250 before submitting any subsequent Requests for Payment. A grantee cannot submit a request for \$3,000 without back-up and then another request for \$3,250 without back-up totaling \$6,250. If the first Request for Payment is for \$3,000 then \$3,000 would need to be backed-up before the next release of funds.

Incomplete/Ineligible Requests for Payment

If the grantee submits a Request for Payment that is incomplete/ineligible/illegible, MHDC will notify both the program and financial contacts as stated on the site contact form via email that the submission is incomplete/ineligible/illegible and that it is being discarded. Grantee will need to submit a new and complete Request for Payment.

Common Reasons for Discarded Payment Requests

- Certificate of insurance has expired
- Previous request not fully backed up
- Missing signatures from authorized signatories
- Scanned electronic submission is illegible

Quarterly Draws Requirement

Grantees must have a minimum of one disbursement per quarter. Requests for Payment that result in discard do not fulfill the Quarterly Draw requirements. HFP quarters and submission deadlines are detailed in [Timeline – FY2016](#).

Back-Up

Grantee is required to submit Back-Up to provide a detailed account of all HFP spending during the FY2016 grant year. The Back-Up must be submitted after any advance of funds is made and before additional funds can be requested. MHDC requires grantees to use a Back-Up form (HFP-103) to account for all spending.

Supporting Documentation

Along with the back-up form, grantees are also required to submit supporting documentation for financial assistance provided to households (i.e., HMIS reports). Grantees will not be required to submit supporting documentation for administrative expenses billed to the HFP grant. Please see [Administrative Expenses](#) for a list of eligible activities and documentation required to be kept on-site.

Back-Up Example

Grantee's total grant award is \$25,000. Grantee requests its first advance of funds for \$6,250 which is 25 percent of grant award. Once the initial advance is fully expended, grantee can submit back-up totaling \$6,250. Once the back-up is received and processed by MHDC, grantee can submit another Request for Payment of up to 25 percent of the total grant award.

Incomplete/Ineligible Back-Up

If the grantee submits Back-Up that is incomplete/ineligible/illegible, MHDC will notify both the program and financial contacts as stated on the site contact form via email that the submission is incomplete/ineligible/illegible and that it is being discarded. Grantee will need to submit new and complete Back-Up.

Common Reasons for Discarded Back-Up

- Expenses paid outside of the reporting period listed on the Back-Up form
- Expenses paid outside of the funding period
- AMI of households served does not total 100 percent
- Expense totals do not match
- Expenses paid outside of designated region
- Ineligible activities
- HMIS reports were not included with the Back-Up or there is missing information on the report
- Electronic submission is illegible
- Missing signatures from authorized signatories

Funding Period

All HFP funding provided to grantees must be used for expenses that are incurred, paid, and submitted for payment to MHDC after April 1, 2016 and before March 31, 2017 with the exception of payroll taxes and/or insurance for administrative expenses. Grantees may request a prorated payment for payroll taxes and/or insurance which covers any portion of the funding period but which was paid outside of the funding period.

Submission Requirements

Funded agencies should submit Requests for Payment (HFP-102) and/or Back-Up forms (HFP-103) and supporting documentation electronically by emailing the documents to the Community Initiatives Accounting email address below. Funded agencies may choose to send in original paper copies if they prefer this method instead. Agencies should not submit both electronic and hard-copy documentation in order to avoid duplicate submissions. Should your agency submit duplicate submissions that are processed you will be responsible for submitting replacement back-up for eligible expenses or paying back the funds that were processed.

Please submit Payment Requests and Back-Up electronically to:

Community Initiatives Accounting: ci.accounting@mhdc.com

OR by mail to:

MHDC – Community Initiatives Department
920 Main, Suite 1400
Kansas City, MO 64105

Eligible Activities

Rental assistance

Rental assistance may be provided on behalf of eligible households. The rental assistance category does not include arrears, deposits or last month's rent.

Rental arrears

A one-time payment of up to six months of rental arrears may be provided on behalf of households in need. Arrears can include late fees accrued by the household. Late fees resulting from grantee's failure to pay rent on behalf of a household by the deadline is not considered an eligible use of the HFP grant. Grantees are encouraged to assist participants in establishing payment plans and negotiating reduced arrears if possible.

Security deposits

Funds may be used to pay for a security deposit that is less than or equal to two months' rent.

Last month's rent

If necessary to obtain housing for a program participant, the last month's rent may also be paid on behalf of the household at the time the first month's rent is paid. The last month's rental assistance cannot exceed one month's rent.

Utility assistance

Utility assistance for gas, electric, water, and sewage may be provided on behalf of eligible households.

Utility deposits

HFP funds may be used to pay for standard utility deposits for gas, electric, water, or sewage.

Utility arrears

Up to six months of arrears for each utility including unpaid gas, electric, water, and/or sewage may be provided to households in need. Arrears can include late fees accrued by the household. Late fees

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resulting from grantee's failure to pay utilities on behalf of a household by the deadline is not considered an eligible use of the Emergency Assistance grant. Grantees are encouraged assist participants establish payment plans and negotiate reduced arrears if possible.

Hotel/motel voucher

Where no appropriate emergency shelter is available for a homeless individual or family, grantee may provide hotel or motel voucher. It is the expectation that grantee work with household to create a housing stabilization plan as well as to ensure household's service and housing needs are addressed.

Administrative Expenses

Grantees may use up to ten percent of the total HFP grant for the payment of administrative costs related to the implementation of HFP activities. Please see [Administrative Expenses](#) for a list of eligible activities and records to maintain.

Ineligible Activities

Utility arrears in excess of six months

Rental arrears in excess of six months

Mortgage Assistance

Expenses that are non-necessities (e.g., telephone, cable television, internet, etc.)

Personal Property Taxes

Households with rental subsidies

Households that receive a tenant-based or project-based rental subsidy are eligible to be assisted with their portion of the monthly rent amount only if the HFP financial assistance will lead to the household obtaining permanent housing, the household has no other resources in order to pay their portion of the rent, and the HFP financial assistance for this use is non-recurring. Households with rental subsidies can be assisted with arrears, security deposits, and utility payments/deposits regardless of the aforementioned criteria.

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Client Recordkeeping Requirements

Record	Criteria	Acceptable Forms of Documentation
Consent Form (HFP-106)	<ul style="list-style-type: none"> This signed form gives MHDC the right to review files and verifies safe and decent housing 	<ul style="list-style-type: none"> HFP Consent Form (HFP-106) signed within 30 days of first instance of assistance Consent Form only needs to be signed once per household per grant year
Income Verification Worksheet (HFP-105)	<ul style="list-style-type: none"> Used to calculate household's income eligibility 	<ul style="list-style-type: none"> Income Verification Worksheet (HFP-105)
Verification of Sources of Income	<ul style="list-style-type: none"> Third-party verification of proof of gross income is needed for all members of the household age 18 and over Must be dated within 30 days of first instance of assistance 	<ul style="list-style-type: none"> Pay stubs, SSI/SSDI award letter/printout, child support statement, EBT statement for TANF No income (18 and older): Certification of Zero Income (HFP-104) If income source documents are unobtainable, third-party written verification (e.g., employer, benefits administrator) will be accepted
Photo Identification	<ul style="list-style-type: none"> Needed for all members of the household age 18 and over 	<ul style="list-style-type: none"> Driver's license, state ID, temporary ID/license, school ID with photo, passport-U.S. or foreign, U.S. passport card, permanent resident card, employment authorization document, U.S. citizen ID card, military ID, Native American tribal card
Social Security Identification	<ul style="list-style-type: none"> Card/number needed for all members of the household 	<ul style="list-style-type: none"> Social Security Card, printout from social security office
Services/Case Management Documentation	<ul style="list-style-type: none"> Assessing, arranging, coordinating, and monitoring delivery of services to facilitate housing stability 	<ul style="list-style-type: none"> Case notes or other documentation of services provided
Proof of Homelessness	<ul style="list-style-type: none"> Proof of household's current living situation 	<ul style="list-style-type: none"> Written certification by service provider, self-certification by head of household, or case notes
Proof of Need	<ul style="list-style-type: none"> Documentation of the amounts/types of assistance needed for the household to gain stability in permanent housing as well as lack of other supports/resources to assist 	<ul style="list-style-type: none"> Copy of bill, current lease agreement, letter from payee
Proof of Payment	<ul style="list-style-type: none"> Payment must be made on or before deadlines stated in the lease 	<ul style="list-style-type: none"> Copy of check; and Check register showing payment cleared highlighted and/or returned checks log

Recertification of Household Eligibility

The purpose of the HFP grant is to provide ongoing support to participants in order to achieve housing stability. The Income Verification Worksheet (HFP-105) and verification of sources of income should be completed at initial intake for households assisted and re-certified at six months if household receives ongoing assistance. At recertification, the sources of income should be current within 30 days. At recertification, grantees need to re-evaluate households assisted for both need and eligibility, including:

1. Determination of whether or not the household composition has changed; and
2. Verification that household's annual gross income does not exceed 50 percent of AMI; and
3. Verification that the household lacks sufficient resources and support networks to obtain or retain housing without HFP assistance.

Administrative Expenses

Grantees can use up to ten percent of the total grant awarded for expenses necessary to the administration of HFP. Grantees are not required to use the full amount allotted for administrative expenses if they would prefer to provide more direct financial assistance instead.

Eligible Activities

- Salaries and benefits associated with staff engaged in grant and program administration
- Administrative services contracted to outside parties, including maintenance activities, general legal, accounting and auditing services. Maintenance activities including routine, necessary, and minor measures to upkeep office space equipment and fixtures, and/or preventative measures to keep the building and its property functioning properly
- Office supplies and equipment
- Mileage costs associated with assisting clients with HFP (e.g., transporting clients, meeting clients at home to conduct intakes, home repair inspections, etc.)

Ineligible Activities

- Conference costs
- Training costs
- Food purchases
- Emergency shelter supplies
- Mileage costs when clients are not present and/or are not being assisted

Administrative Records to Maintain

Grantees requesting reimbursement for these types of expenses need to list them in the Administrative Detail section of the Back-Up form (HFP-103). The chart below details the documentation requirements for administrative costs billed to HFP. Supporting documentation of Administrative Expenses should be kept on-site for MHDC Compliance Officer to review at site visits.

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Activity	Acceptable Forms of Documentation (both Cost Incurred and Proof of Payment are required)	
	Cost Incurred	Proof of Payment
Bills paid Services performed Office supplies/ equipment	Invoice Receipt	Check register or credit card statement with payments made by HFP highlighted and/or returned checks log
Mileage costs	Travel request which includes date(s) of travel, from/to, purpose of travel, number of miles, and total mileage costs	Check register or credit card statement with payments made by HFP highlighted and/or returned checks log
Salary/Benefits	Pay stub listing pay periods, employee listed, last four digits of SSN	Copy of pay stub

Income Eligibility

All households assisted through the HFP are required to be at or below 50 percent of the Area Median Income (AMI). HFP grantees should use the HFP Area Median Income Limits form (HFP-109) in conjunction with the Income Verification Worksheet (HFP-105) to determine households' income eligibility. If the AMI for the county of service is lower than the Missouri state AMI, grantee shall use the AMI for the state to determine eligibility. If the specific county served is not listed on the Income Limits Form, grantee shall follow the state of Missouri income guidelines. The income limits are to be used throughout the entire FY2016 grant year unless otherwise notified by MHDC. Currently the HFP program bases its calculation method from HUD's Handbook 4350.3, Chapter 5, Section 5-5; grantees should refer to this guidance for the correct calculation of income.

Standard Forms of Income Grantees are expected to utilize the list below when calculating a household's income.

Inclusions:

- Income from all members of the household age 18 and over
- Gross wages from employment
- Full amount of periodic payments
- Unemployment Benefits, Worker's Compensation, Severance
- Entitlements (e.g., TANF, SSI, SSDI, etc.)
- Periodic and determinable allowances (alimony and child support)
- Net income from business operations
- Self-employment (e.g., child care, housekeeping, contracted work, etc.)
- Interest, dividends or other net income from personal property
- Unearned income from children under 18 years of age (i.e., benefits paid to adult member of household on behalf of a minor)

Exclusions:

- Earned income from children under 18 years of age
- Foster care payments

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- Lump sum payments
- Reimbursement or payment of medical expenses
- Income of live-in aide
- Financial Aid
- Resident service stipend (part-time work that enhances the quality of life – not to exceed \$200/month)
- Temporary, non-recurring income (gifts)
- Earnings over \$480 per year for full-time students 18 years and older (excluding Head of Household)
- Adoption assistance payments
- Amounts paid by state to household with a developmentally disabled child to keep them in the home
- Food Stamps, WIC Payments

Additional Forms of Income Grantees are expected to utilize the list below when calculating a household's assets. Income earned from the cash value of a household's assets should be included in the total income. If the net household's assets have a cash value of \$5,000 or over, annual income must include the greater of:

- The actual income from the assets; or
- Imputed income from the assets. (Impute income by multiplying total net household assets by the passbook rate specified by HUD. See HUD Handbook 4350.3: Chapter 5)

Inclusions:

- Cash held in savings and checking accounts, safe deposit boxes, home, etc.
- Cash value of revocable trusts
- Equity in rental property
- Cash value of stocks, bonds, treasury bills, CDs and money market accounts
- Individuals Retirement and Keogh Accounts
- Retirement and pension funds
- Cash value of life insurance policies
- Personal property held as an investment
- Lump sums not intended as periodic payments
- A mortgage or deed of trust held by an applicant

Exclusions

- Necessary personal property (e.g., clothing, furniture, antique cars, etc.)
- Interest in Indian Trust Lands
- Assets not effectively owned by applicant
- When assets are held in an individual's name, but the benefit is to someone that is not in the household
- Equity in co-operations in which the family lives
- Assets not accessible to and that provide no income
- Term life insurance policies
- Assets that are part of an active business

Homeless Status Definitions

Category	Definition
Literally Homeless	<p>Individual or family who lacks a fixed, regular, and adequate nighttime residence, such as:</p> <ul style="list-style-type: none"> • Primary nighttime residence that is a public or private place not meant for human habitation; • Living in a shelter designated to provide temporary living arrangements (i.e., congregate shelter, transitional housing, hotel/motel paid for by charitable organization, or government program); or • Exiting an institution where he/she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering the institution
Fleeing/Attempting to Flee Domestic Violence	<p>An individual or family who:</p> <ul style="list-style-type: none"> • Is fleeing or attempting to flee domestic violence; and • Has no other residence; and • Lacks the supports or resources to obtain other permanent housing

Direct Assistance Timeframe

It is MHDC's expectation that HFP grantees serve eligible households in a timely manner. A timely manner is considered financial assistance paid on behalf of the household within 30 days of the date of intake. In the event that grantee is unable to serve the household within the allotted timeframe, their file needs to be documented with an explanation of the factors that contributed towards not meeting this requirement.

Termination and Grievance Procedures

All HFP grantees must have written policies in place that address termination and grievance procedures for program participants that violate program requirements. The policies should detail the program requirements, the termination process, and the grievance procedure for all clients served with HFP. The policies must also detail the timeline and method for notifying clients of their termination, as well as the process to allow clients to appeal the decision. When determining whether program violations merit termination, grantees should consider all extenuating circumstances in order to ensure that assistance is only terminated in the most severe situations. Termination does not prohibit the program from providing further assistance at a later date to the same individual or family. Policies should be retained by grantee and made available upon request by MHDC.

Prioritizing Assistance

HFP grantees should develop or update current written prioritization standards in relation to administration of its HFP grant. Written standards should clearly detail policies and procedures for assessing eligibility for assistance and determining and prioritizing which eligible individuals and families will receive assistance. Written standards should address grantee’s unique eligibility requirements for assistance as well as the priority given to those most vulnerable or with the most severe housing needs. Where possible, grantees are encouraged to align itself with its Continuum of Care’s priorities and Coordinated Entry system. Procedures should be retained by grantee and made available upon request by MHDC.

Homeless Management Information System

Homeless Management Information System (HMIS) is a database that records and stores client-level data regarding the delivery of housing and services to households who are homeless. HFP grantees are required to enter data into the HMIS system of their Continuum of Care. The data must be entered into the HMIS system that represents the county of service. If the grantee serves persons with HFP monies in multiple Continua, HMIS data must be entered into the appropriate HMIS systems. Grantees serving victims of domestic violence are required to enter data into a comparable database. Grantees are responsible for ensuring that all data collection within HMIS and comparable databases are in compliance with HUD HMIS Minimum Data Standards, therefore grantees should work with HMIS lead agencies to ensure they are trained on proper data entry, etc. The table below details the HMIS lead contact information for each Continuum of Care.

Continuum of Care	HMIS Contact	Phone Number
Balance of State, Joplin, Springfield, and St. Louis City	Institute for Community Alliances	573-298-6068
St. Charles, Lincoln, Warren	Community Council of St. Charles County	636-978-2277
St. Louis County	Municipal Information Systems, Inc.	1-800-536-6474
Kansas City and St. Joseph	MAACLink	816-561-2727

Continuum of Care Meetings

In an effort to encourage collaboration and knowledge of services within areas of the state, HFP grantees are required to attend at least 75 percent of all Continuum of Care (CoC) meetings in the Continuum in which the majority of HFP grant funds is allocated. These meetings bring together many different agencies working toward the improvement of housing and ending homelessness in the state of Missouri. The HFP grantee will be required to submit a CoC Attendance Form (HFP-119) detailing the meetings attended at the close out of the grant. It is the grantee’s responsibility to provide the CoC representative with the CoC Attendance Form (HFP-119) within the requested timeframe to complete after each meeting that is attended. MHDC acquires feedback from each CoC chair regarding the agency’s level of participation which may be assessed on future HFP applications for funding. The list of

Missouri Continua is located on the Missouri Governor's Committee to End Homelessness website at: <http://www.endhomelessnessmo.org>

Monitoring

In order to track a grantee's program compliance, ensure accurate spending of HFP, prevent fraud and abuse, and identify technical assistance needs, MHDC staff will monitor grantees' by conducting on-site compliance reviews that include a review of all financial documentation submitted to MHDC.

On-Site Compliance Visits

On-site compliance visits will be conducted at location designated by the grantee. The MHDC Compliance Officer will review instances of assistance. Compliance Officer will review 50 percent of the instances of assistance with a minimum of ten and a maximum of twenty-five randomly chosen instances per visit from the back-up submitted to date. This information is gathered from the HMIS Client Detail Reports submitted with grantee's back-up. The Compliance Officer will not provide the grantee the names of the files to be checked prior to the visit; this is to ensure that all files will be reviewed in the state in which they are normally kept. For Administrative Expenses, the Compliance Officer will review 50 percent of the amount of costs that have been submitted to MHDC for payment.

The requested files are expected to be produced within fifteen (15) minutes of the Compliance Officer's arrival. Failure to produce requested files within fifteen (15) minutes will result in a compliance violation*. Therefore, it is vital that a grantee staff member is always available to assist the MHDC staff member as needed at the location and during the times provided by grantee.

* The only exception is if a staff member is assisting a client.

Scheduled (Announced) Visit

The announced site visit is scheduled by the Community Initiatives Administrative Assistant with the grantee. If MHDC staff is unsuccessful in scheduling a site visit after three attempts have been made via telephone and/or e-mail, MHDC staff will notify the grantee informing them that they have 15 days to schedule a site visit, otherwise their funding will be suspended and grantee will be considered out of compliance until the visit is scheduled.

Unscheduled (Unannounced) Visit

MHDC staff members have the right to conduct unannounced visits at the location(s) and times furnished by the grantee in the updated on the Site Contact Form or updated via email to Joselyn Pflieger (whichever is most recent). It is the grantee's responsibility to notify MHDC if business hours change or if the grantee will be closed for an extended amount of time. Unannounced site visits are conducted based on certain factors, including but not limited to, agency's prior history with HFP, outcome of announced visit, and fulfilling grant requirements such as timely and accurate submission of Requests for Payment and Back-Up. MHDC will not conduct site visits on state or federal holidays.

Electronic Files

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If the grantee elects to maintain electronic files in lieu of paper files, the grantee will be required to print off all required documentation for compliance visits. As with all files, the time limit to produce these files is fifteen (15) minutes during a site visit.

Exit Interview

At the conclusion of the site visit, the Compliance Officer will discuss the findings of the visit with the appropriate grantee staff member(s). The Grantee will be given the opportunity to discuss the findings as well as any other questions and concerns with the Compliance Officer. The Compliance Officer will conduct a written exit interview in order to ensure that grantee representative is in agreement with the outcome of the visit, as well to documents any follow-up actions required by MHDC and/or grantee. The final compliance status is determined at the discretion of CI Management.

Monitoring Letter

After completing an on-site visit, the Compliance Officer will prepare a letter detailing the results of the review, including any minor or major findings, areas for improvement, corrective actions that need to be taken and the deadline to complete these actions.

Compliance Violations

Out of Compliance

If the MHDC staff member finds that the grantee is out of compliance, the Compliance Officer will record that the grantee is out of compliance. Until the Compliance Officer has verified that the issue(s) has/have been resolved, funding will be suspended.

If the grantee is found out of compliance they will need to submit a Corrective Action Plan (CAP) detailing the reason(s) for out of compliance status and how the findings will be corrected. Depending on the reason(s) for out of compliance status, grantee may also be subject to a follow-up site visit conducted by the Compliance Officer in order to ensure that the issues have been resolved. It will not be until the next completed Back-Up Form is submitted that the Compliance Officer may conduct the follow-up site visit. The follow-up site visit will be based on the most recent back-up documentation.

If an agency is found out of compliance with the HFP grant, funding will be suspended for all other HFP grants that the agency has been awarded. Once the grantee is found back in compliance with the HFP grant in which they were found out of compliance, funding will be reinstated for all HFP grants that the agency administers.

If the issue(s) that caused the grantee to be out of compliance are resolved after the CAP and/or follow-up site visit review, the Compliance Officer will notify the grantee that their funding is no longer suspended. If the issue(s) that caused the grantee to be out of compliance are still not resolved after the CAP and/or follow-up site visit review, the Compliance Officer will notify the grantee of their findings and funding will be suspended for all grants that the agency has been awarded through the Community Initiatives department.

Consequences for Non-Compliance

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The following violations will be noted in grantee's records, and points may be assessed during future application cycles:

- Grant partially or fully recaptured (i.e., funds not fully expended by the end of the grant term)
- Less than half of files reviewed at an on-site visit had missing or incomplete information
- Funds not drawn quarterly
- Grant not fully closed out by deadline
- Grantee not within ten percent of Minority/Women-Owned business application projections at close out

The following violations will result in grantee being out of compliance, which will require MHDC to suspend funding for all HFP grants, assess points for future applications, and in most instances, a Corrective Action Plan will be required in order to reinstate compliance:

- More than one-half of files reviewed during on-site compliance visit contained findings
- Files were unable to be reviewed during the site visit
- Files were not produced within 15 minute time frame
- Grantee will not schedule visit; after three attempts and no response from request sent within 15 days of date of request
- Grantee accommodations deemed to be unsafe or unsanitary; allegations of clients being put in danger by grantee

Grant Close Out

Once all funds have been expended, grantee is required to "close out" their grant. The close out process consists of several components:

1. Close Out form (HFP-112)
2. Continuum of Care Meeting Attendance form (HFP-119)
3. Consolidated Annual Performance Evaluation Report (CAPER)
4. All funds backed up

All complete and final close out information needs to be submitted electronically to Joselyn Pfliegier (jpfliegier@mhdc.com) on or before 5:00 p.m. on April 30, 2017. Any funds that are not backed up by the deadline will be recaptured.

Appendix A – Initial Grant Documents

Before any funds can be released, all required initial grant documents must be completed and received by MHDC on or before 5:00 p.m. April 1, 2016. All documents must be submitted in hard-copy to MHDC's Kansas City office.

Authorized Signature Card (HFP-101)

Description: This form designates all authorized signatories for each grant. All documents that are required to be signed by grantee must be signed by authorized signatories only. If an unauthorized person signs a document, the document will be rejected.

Completion Instructions: Form must designate at least two authorized signatories. The form must include signatures from all designated signatories. Please note the Authorizing Official must sign in the Authorizing Official box as well as at the bottom of the form.

2016 Grant Agreement

Description: The grant agreement is required for all grantees. The grant agreement specifically details the requirements and expectations for the administration of the grant. It is the grantee's responsibility to know and adhere to all provisions set forth in the grant agreement.

Completion Instructions: There are three places where the grant agreement must be completed by grantee:

1. Signature page – requires signature and notary.
2. Workforce Eligibility Affidavit – requires signature and notary; and,
3. Rider B – requires signature.

All signatures must be original and by an authorized signatory as designated in the Authorized Signature Card. The entire original signed, notarized agreement must be returned to MHDC to be considered complete. If any pages of the grant agreement are missing, the grant agreement will be considered incomplete. Failure to submit a fully complete, properly executed grant agreement before April 30, 2016 will result in recapture of the grant.

Site Contact Form (HFP-110)

Description: This form ensures that MHDC has updated information for the upcoming grant year, including staff contact information, office location(s), hours of operation, and any other relevant information. Please note that the information provided will be used to conduct scheduled and unscheduled site visits.

Completion Instructions: Complete information pertaining to the grant indicated at top of form. If grant contact or hours of operation change, grantee is responsible for submitting an updated Site Contact Form or informing Joselyn Pflieger via email.

Direct Deposit Form (HFP-118) and Blank Check

Description: All disbursements from MHDC to grantee will occur using an Electronic Funds Transfer (EFT). This Direct Deposit Form provides MHDC with the grantee's banking information for the electronic transfer. A blank voided check from the indicated banking institution is also required to be submitted with the Direct Deposit form. If the agency does not have access to a blank voided check a letter from the bank confirming the account and routing number will be accepted. **Please note:** By default grantee's banking information will be updated for ALL MHDC accounts, unless otherwise indicated on the direct deposit form.

Completion Instructions: Form must be signed with original signatures by authorized signatory.

E-Verify Memorandum of Understanding (MOU)

Description: The E-Verify MOU is an agreement between the Department of Homeland Security (DHS) and Grantee stating that grantee agrees to participate in the Employment Eligibility Verification Program (E-Verify).

Completion Instructions: Grantees that were not funded in FY2015 through Housing First Program, Missouri Housing Trust Fund, and/or FY2016 Emergency Solutions Grant (ESG) shall submit a copy of the full and complete MOU generated from DHS' online E-Verify system.

Certificate of Liability Insurance

Description: The Certificate of Insurance is a one page summary of current Liability Insurance held by grantee. The insurance held by grantee may include: General Liability, Automobile Liability Umbrella Liability, Excess Liability, Worker's Compensation and Employers' Liability. The Certificate of Liability Insurance must be current. If coverage lapses during the grant year, grantee must provide MHDC with one updated Certificate for all Community Initiatives grants that the grantee administers (i.e., Housing First Program, Emergency Solutions Grant, Missouri Housing Trust Fund , and/or Homeless Management Information System Fund Balance.

United Way 2-1-1 Registration

Description: United Way 2-1-1 is a phone number that individuals can call in order to receive needed resources in their area. In order to be a reliable resource for households in need, organization's need to submit updated information as changes arise.

Completion Instructions: Grantees are required to register/update their organization's information on the United Way's website, and print the webpage showing the organization's information is available. Additional instructions are located on the United Way's website at: <http://www.211helps.org/agency/get-listed>

Appendix B – Client File Forms

Income Worksheet (HFP-105)

Due Date:	Income eligibility must be certified at first instance of assistance with HFP. If household is receiving ongoing HFP financial assistance, income needs to be re-certified at six months. At each income eligibility certification, proof of income must be current within 30 days.
Required:	Yes
Submission / Retention:	Retained in client file
Description:	This form is intended to be used to verify income eligibility.
Completion Instructions:	<ol style="list-style-type: none"> 1. Household Information: Complete Household information for all members of the household. The “Total Number of Members in Household” will automatically calculate depending on the number of persons listed in the Household Members section. The number of members in the household is used to automatically calculate the AMI for the household size; therefore, it is very important that all members of the household are included in that section. 2. Gross Annual Income: This section must be completed in order to calculate Area Median Income. Once all the members of the household are listed, gross income will need to be calculated for all adult members age 18 and older. There are ten lines in this section for income to be detailed. A separate line should be completed for each source of income received by household member. See HUD Handbook 4350.3 for complete instructions on calculating income. 3. Income from Assets: List the amounts of all assets received by each household member in the designated table. If one or more household members share assets, the respective asset only needs to be listed one time in this section. See HUD Handbook 4350.3 for complete instructions on calculating income from assets. 4. Area Median Income (AMI): Once the income and assets have been completed for all members of the household receiving income, the AMI can be calculated. Choose the county of service from the drop down. If the county of service is not listed then that county’s AMI is lower than the State AMI and the “MISSOURI - State” should be selected. If “MISSOURI – State” is selected, please also select the county of service from the drop down. Once the appropriate county is selected the AMI breakdown for that selection will populate. The total household income is automatically calculated from the individual income/asset calculation charts. The service provider can then compare the household income to the AMI breakdown for the county of service to determine if household meets income eligibility requirements.

Employer Verification Form (HFP-121)

Due Date:	Income eligibility must be certified at first instance of assistance with HFP. If household is receiving ongoing HFP financial assistance, income
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Required:	needs to be re-certified at six months. At each income eligibility certification, proof of income must be current within 30 days. Yes, if client is employed but cannot provide documentation of income from employment.
Description:	This form is intended to be completed by the employer to verify the individual's income.
Completion Instructions:	Grantee will complete the top section of the form detailing where the form should be returned. The individual seeking assistance will sign and date the form authorizing the employer to release the individual's employment information. The employer will then complete the bottom half of the form, listing the client's employment information, as well as the employer's contact information and signature.
Submission Instructions:	Retained in client file.

Certification of Zero Income (HFP-104)

Due Date:	Completed at first instance of assistance, and re-certified at six months for households receiving ongoing HFP financial assistance for each adult member of the household (age 18 and over) who does not have any form of income.
Required:	Yes – All members of household without income, age 18 and over
Description:	A Certification of Zero Income form must be completed and signed by all recipients of the household, age 18 and over, that does not have income. The HFP-203 form is the only acceptable form of certification of zero income and other versions or alterations of this form will not be accepted.
Completion Instructions:	All members of household without income, 18 and over must sign a Certification of Zero Income. The date of the form must be within 30 days of the instance of assistance. The original, signed form should be retained in the client file.

Consent Form (HFP-106)

Description:	The consent form must be completed and signed by head of household before HFP assistance can be provided. The HFP Consent Form is the only acceptable consent form and other versions or alterations of this form will not be accepted.
Completion Instructions:	The head of household must sign the Grant Recipient's Consent to Release Information once eligibility for HFP is determined. The date of the form must be within 30 days of the first instance of assistance. The head of the household only needs to sign the form one time during the grant year. The head of household must also check one of the boxes at the bottom of the consent form certifying whether or not housing is safe, decent, and sanitary. If a box is not checked then the form is not considered complete. If recipient checks the "IS NOT" box, please address agency's efforts to remedy the housing conditions in the client's file. The original signed form retained in client file.

Area Median Income Limits (HFP-109)

Description: The Area Median Income Limits designate the maximum income limits, by household size, allowable by HFP for the FY2016 grant year. These income calculations should be referred to when determining household's income eligibility. If specific county is not listed, grantee should refer to the "Missouri – State" section at the top of the document.