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HOME Investment Partnerships American
Rescue Plan Program
Supportive Services for Tenant-Based
Rental Assistance Participants

Supplemental Manual



30 South Meridian Street, Suite 900

Indianapolis, Indiana 46204

317.232.7777 (p)

317.232.7778 (f)

Website: <https://www.in.gov/ihcda>

An amended Administration Manual will be released periodically, and the newest edition overrides all previous editions. Except where otherwise noted, all amendments to the Administration Manual apply to all awards, regardless of year of funding.

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Section 1: Program Introduction

The information and requirements described in this section pertain only to subrecipients who have applied for and been awarded HOME-ARP Supportive Services for HOME Investment Partnerships Program Tenant Based Rental Assistance (“HOME TBRA”) participants through a competitive RFQ process.

IHCDA allocated HOME-ARP funds to be used with the HOME TBRA Program to provide supportive services to qualifying populations. HOME-ARP Supportive Services may only be provided to individuals and households who are enrolled in the HOME TBRA Program. HOME TBRA Program participants may not be required to accept supportive services as a condition of continued receipt of rental assistance.

Section 2: Program Activities

2.1 Eligible Activities

HOME-ARP Supportive Services funding may be used to reimburse eligible supportive services costs for HOME TBRA Program participants. In accordance with [HUD Notice CPD-21-10 Requirements for the Use of Funds in the HOME-American Rescue Plan Program](#), eligible supportive services for this program are listed below. To effectively serve HOME TBRA participants and meet the Cost Principles requirements outlined below, not all services outlined in HUD Notice CPD-21-10 are included in the list of eligible services.

1. *Oversight of Eligible Costs:* All supportive service costs paid for by HOME-ARP must comply with the requirements of HUD Notice CPD 21-10, including requirements in 2 CFR part 200, subpart E, Cost Principles that require costs be necessary and reasonable. If a qualifying household is already receiving the same eligible supportive service or has been approved to receive the same service through another program or provider, the program participant does not have a need for the HOME-ARP service. Subrecipients are responsible for ensuring participants do not receive duplicative assistance.
2. *Direct Provision of Services:* If services outlined in this section are being directly delivered by a subrecipient, the following costs are eligible project delivery costs for those services:
 - a. The costs of labor or supplies and materials incurred by the subrecipient in directly providing supportive services to program participants.
 - b. The salary and benefit packages of the subrecipient staff who directly deliver the services.

These project delivery costs must be attributable to the identifiable objective of the service delivered, otherwise they are administrative costs of the subrecipient.

3. *Eligible Costs for McKinney Vento Supportive Services and Homelessness Prevention Services:* Eligible costs for supportive services under either of these two categories include costs associated with the following services:
 - a. *Childcare:* The costs of childcare for program participants, including providing meals and snacks, and comprehensive and coordinated developmental activities, are eligible. The childcare center must be licensed by the jurisdiction in which it operated in order for its costs to be eligible. The following conditions also apply:
 - i. Children must be under the age of 13 unless the children have a disability.
 - ii. Children with a disability must be under the age of 18.
 - b. *Education services:* The costs of improving knowledge and basic educational skills are eligible costs including:
 - i. Instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED).
 - ii. Screening, assessment, and testing; individual or group instruction; tutoring; provision of books, supplies, and instructional material; counseling; and referral to community resources.
 - c. *Employment assistance and job training:* The costs of establishing and/or

operating employment assistance and job training programs are eligible, including classroom, online and/or computer instruction, on-the-job instruction, services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of providing reasonable stipends to program participants in employment assistance and job training programs is also an eligible cost.

- i. Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.
 - ii. Services that assist individuals in securing employment consist of:
 1. Employment screening, assessment, or testing;
 2. Structured job skills and job-seeking skills;
 3. Special training and tutoring, including literacy training and pre-vocational training;
 4. Books and instructional material;
 5. Counseling or job coaching; and
 6. Referral to community resources.
- d. *Food*: The cost of providing meals or groceries to program participants is eligible.
- e. *Housing search and counseling services*: Costs of assisting eligible program participants to locate, obtain, and retain suitable housing are eligible. Services are:
- i. Development of an action plan for locating housing;
 - ii. Housing search;
 - iii. Tenant counseling;
 - iv. Securing utilities;
 - v. Making moving arrangements;
 - vi. Outreach to and negotiation with owners;
 - vii. Assistance submitting rental applications and understanding leases;
 - viii. Assistance obtaining utilities; and
 - ix. Tenant counseling;
 - x. Mediation with property owners and landlords on behalf of eligible program participants;
 - xi. Credit counseling, accessing a free personal credit report, and resolving personal credit issues; and
 - xii. Payment of rental application fees;
- Please Note: When subrecipients provide housing services to eligible persons that are incidental to a larger set of holistic case management services, these services do not meet the definition of Housing counseling, as defined in 24 CFR 5.100, and therefore are not required to be carried out in accordance with the certification requirements of 24 CFR 5.111.*
- f. *Legal services*: Eligible costs are the fees charged by licensed attorneys and by person(s) under the supervision of licensed attorneys, for advice and representation in matters that interfere with a qualifying individual or family's ability to obtain and retain housing.
- i. Eligible subject matters are child support; guardianship; paternity; emancipation; legal separation; orders of protection and other legal remedies for victims of domestic violence, dating violence, sexual assault, human trafficking, and stalking; appeal of veterans and public benefit

- claim denials; landlord-tenant disputes; and the resolution of outstanding criminal warrants; landlord/tenant matters, provided that the services must be necessary to resolve a legal problem that prohibits the program participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which the program participant currently resides.
- ii. Legal services for immigration and citizenship matters and for issues related to mortgages and homeownership are ineligible. Retainer fee arrangements and contingency fee arrangements are prohibited.
 - iii. Services may include client intake, receiving and preparing cases for trial, provision of legal advice, representation at hearings, and counseling.
 - iv. Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the subrecipient's employees' salaries and other costs necessary to perform the services.
- g. *Life skills training*: The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, dating violence, sexual assault, stalking, human trafficking, substance abuse, and homelessness are eligible. These services must be necessary to assist the program participant to function independently in the community. Life skills training includes:
- i. The budgeting of resources and money management, household management, conflict management, shopping for food and other needed items, nutrition, the use of public transportation, and parent training.
- h. *Mental health services*: Eligible costs are the direct outpatient treatment of mental health conditions that are provided by licensed professionals.
- i. Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances. Problem areas may include family and marital relationships, parent-child problems, or symptom management.
 - ii. Services are crisis interventions; counseling; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.
- i. *Outpatient health services*: Eligible costs are the direct outpatient treatment of medical conditions when provided by licensed medical professionals including:
- i. Providing an analysis or assessment of program participant's health problems and the development of a treatment plan;
 - ii. Assisting program participants to understand their health needs;
 - iii. Providing directly or assisting program participants to obtain and utilize appropriate medical treatment;
 - iv. Preventive medical care and health maintenance services, including in-home health services and emergency medical services;

- v. Provision of appropriate medication;
 - vi. Providing follow-up services; and
 - vii. Preventative and non-cosmetic dental care.
- j. *Outreach services*: The costs of activities to engage qualified populations for the purpose of providing immediate support and intervention, as well as identifying potential program participants, are eligible.
- i. Eligible costs include the outreach worker's transportation costs and a cell phone to be used by the individual performing the outreach.
 - ii. Costs associated with the following services are eligible: initial assessment; crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; actively connecting and providing people with information and referrals to homeless and mainstream programs; and publicizing the availability of the housing and/or services provided within the subrecipient's geographic area.
- k. *Substance abuse treatment services*: Eligible substance abuse treatment services are designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors and are provided by licensed or certified professionals. The costs include:
- i. Program participant intake and assessment;
 - ii. Outpatient treatment;
 - iii. Group and individual counseling;
 - iv. Drug testing;
 - v. Inpatient detoxification and other inpatient drug or alcohol treatment are ineligible.
- l. *Transportation*: Eligible costs are:
- i. The costs of program participant's travel on public transportation or in a vehicle provided by the subrecipient to and from medical care, employment, childcare, or other services eligible under this Notice;
 - ii. Mileage allowance for service workers to visit program participants and to carry out housing inspections;
 - iii. The cost of purchasing or leasing a vehicle in which staff transports program participants and/or staff serving program participants with written IHCA approval;
 - iv. The cost of gas, insurance, taxes, and maintenance for the vehicle;
 - v. The costs of subrecipient staff to accompany or assist program participants to utilize public transportation; and
 - vi. If public transportation options are not sufficient within the area, the subrecipient may make a one-time payment on behalf of a program participant needing car repairs or maintenance required to operate a personal vehicle, subject to the following:
 - 1. Payments for car repairs or maintenance on behalf of the program participant may not exceed 10 percent of the Blue Book value of the vehicle (Blue Book refers to the guidebook that compiles and quotes prices for new and used automobiles and other vehicles of all makes, models, and types);
 - 2. Payments for car repairs or maintenance must be paid by the

subrecipient directly to the third party that repairs or maintains the car; and

3. Subrecipients may require program participants to share in the cost of car repairs or maintenance as a condition of receiving assistance with car repairs or maintenance.
- vii. Payments for the cost of gas, insurance, taxes, the one-time payment for car repairs or maintenance described above, and maintenance for vehicles of program participants must be limited to program participants with the inability to pay for such costs and who, without such assistance, would not be able to participate in eligible services under this Section. Subrecipients must maintain written justification for these expenses in the tenant file.
- m. *Case management*: The costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant(s) are eligible costs. Subrecipients providing these supportive services must have written standards for providing the assistance. Eligible costs are those associated with the following services and activities:
 - i. Conducting the initial evaluation, including verifying and documenting eligibility, for individuals and families applying for supportive services;
 - ii. Counseling;
 - iii. Developing, securing, and coordinating services;
 - iv. Using the Coordinated Entry System (CE);
 - v. Obtaining federal, State, and local benefits;
 - vi. Monitoring and evaluating program participant progress;
 - vii. Providing information and referrals to other providers;
 - viii. Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking;
 - ix. Developing an individualized housing and service plan, including planning a path to permanent housing stability; and
 - x. Conducting re-evaluations of the program participant's eligibility and the types and amounts of assistance the program participant needs.
- n. *Mediation*: HOME-ARP funds may pay for mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the program participant from losing permanent housing in which the program participant currently resides.
- o. *Credit repair*: HOME-ARP funds may pay for credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.
- p. *Landlord/Tenant Liaison*: Costs of liaison services between property managers/owners and program participants are eligible HOME-ARP costs and may include:
 - i. Landlord outreach;
 - ii. Rental application fees for clients, in accordance with the financial

- assistance costs requirements in (r);
- iii. Mediation services in (n) for housing issues that may arise between owner, property manager, or other residents and clients;
- iv. Coordination or assistance with the provision of other HOME-ARP eligible services to assist clients to maintain permanent housing.
- q. *Services for special populations:* HOME-ARP funds may be used to provide services for special populations, such as victim services, so long as the costs of providing these services are eligible under this section. The term victim services means services that assist program participants who are victims of domestic violence, dating violence, sexual assault, stalking, or human trafficking including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, stalking, or human trafficking.
- r. *Financial assistance costs:* HOME-ARP funds may be used to pay housing owners, utility companies, and other third parties for the following costs, as applicable:
 - i. Rental application fees: Rental housing application fee that is charged by the owner to all applicants.
 - ii. Utility payments: HOME-ARP funds may pay for up to 24 months of utility payments per program participant, per service, including up to 6 months of utility payments in arrears, per service. A partial payment of a utility bill counts as one month. This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments. Eligible utility services are gas, electric, water, and sewage. No program participant shall receive more than 24 months of utility assistance within any 3-year period.
 - iii. Moving costs: HOME-ARP funds may pay for moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance under this section of the Notice and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.
 - iv. Payment of rental arrears: HOME-ARP funds may be used for a one-time payment for up to 6 months of rent in arrears, including any late fees or charges on those arrears, if necessary for the household to maintain their existing housing or, for those without housing, if necessary to remove a demonstrated barrier to obtaining housing

2.2 Ineligible Activities

Financial assistance cannot be provided to a program participant who is receiving the same type of assistance through other public sources. Financial assistance also cannot be provided to a program participant who has been provided with replacement housing payments under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended

(42 USC 4601 et seq.) and its implementing regulations at [49 CFR part 24](#), or Section 104(d) of the Housing and Community Development Act of 1974 (42 USC 5304(d) and its implementing regulations at [24 CFR part 42](#), during the period of time covered by the replacement housing payments.

Section 3: Participant Selection

3.1 Eligible Participants

HOME TBRA participants who meet the following definitions of “formerly incarcerated individual”, as described in Section 4.1 of the 2022 IHCD HOME TBRA Administration Manual, **and** “qualifying population”, as defined in Section IV.A of HUD Notice CPD-21-10, will be eligible to receive supportive services. HOME TBRA subrecipients that were awarded funds in 2021 may provide services to participants who meet the expanded definition of “eligible participant” included in the 2021 IHCD HOME TBRA Administration Manual.

Eligible participants in the HOME TBRA program are households in which at least one member of the household was formerly incarcerated. “Formerly incarcerated” may be defined as 1.) individuals exited the corrections system within six months who are at risk of homelessness due to a lack of stable housing, or 2.) individuals currently experiencing homelessness who were formerly incarcerated.

The American Rescue Plan requires that funds be used to primarily benefit individuals and families in the following specified “qualifying populations”:

1. **Homeless**, as defined in [24 CFR 91.5](#) Homeless (1), (2), or (3):
 - a. An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - i. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
 - ii. An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
 - iii. An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;
 - b. An individual or family who will imminently lose their primary nighttime residence, provided that:
 - i. The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
 - ii. No subsequent residence has been identified; and
 - iii. The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks needed to obtain other permanent housing;
 - c. Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

- i. Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
 - ii. Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
 - iii. Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
 - iv. Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment;
2. **At risk of Homelessness**, as defined in [24 CFR 91.5](#) *At risk of homelessness*:
- a. An individual or family who:
 - i. Has an annual income below 30 percent of median family income for the area, as determined by HUD;
 - ii. Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “Homeless” definition in this section; and
 - iii. Meets one of the following conditions:
 - 1. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - 2. Is living in the home of another because of economic hardship;
 - 3. Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
 - 4. Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;
 - 5. Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;
 - 6. Is exiting a publicly funded institution, or system of care (such as a

health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

7. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;
 - b. A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(l) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(l)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or
 - c. A child or youth who does not qualify as “homeless” under this section but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.
3. **Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD.**

For HOME-ARP, this population includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. This population includes cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual’s or family’s primary nighttime residence or has made the individual or family afraid to return or remain within the same dwelling unit. In the case of sexual assault, this also includes cases where an individual reasonably believes there is a threat of imminent harm from further violence if the individual remains within the same dwelling unit that the individual is currently occupying, or the sexual assault occurred on the premises during the 90-day period preceding the date of the request for transfer.

Domestic violence, which is defined in [24 CFR 5.2003](#) includes felony or misdemeanor crimes of violence committed by:

- 1) A current or former spouse or intimate partner of the victim (the term “spouse or intimate partner of the victim” includes a person who is or has been in a social relationship of a romantic or intimate nature with the victim, as determined by the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship);
- 2) A person with whom the victim shares a child in common;
- 3) A person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner;
- 4) A person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving HOME-ARP funds; or
- 5) Any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

Dating violence which is defined in [24 CFR 5.2003](#) means violence committed by a person:

- 1) Who is or has been in a social relationship of a romantic or intimate nature with the victim; and
- 2) Where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - a. The length of the relationship;
 - b. The type of relationship; and
 - c. The frequency of interaction between the persons involved in the relationship.

Sexual assault which is defined in [24 CFR 5.2003](#) means any nonconsensual sexual act proscribed by Federal, Tribal, or State law, including when the victim lacks capacity to consent.

Stalking which is defined in [24 CFR 5.2003](#) means engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

- 1) Fear for the person's individual safety or the safety of others; or
- 2) Suffer substantial emotional distress.

Human Trafficking includes both sex and labor trafficking, as outlined in the Trafficking Victims Protection Act of 2000 (TVPA), as amended (22 U.S.C. 7102). These are defined as:

- 1) *Sex trafficking* means the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose of a commercial sex act, in which the commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or
- 2) *Labor trafficking means* the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

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

- a. **Other Families Requiring Services or Housing Assistance to Prevent Homelessness** is defined as households (i.e., individuals and families) who have previously been qualified as "homeless" as defined in [24 CFR 91.5](#), are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed, and who need additional housing assistance or supportive services to avoid a return to homelessness.

- b. **At Greatest Risk of Housing Instability** is defined as household who meets either paragraph (i) or (ii) below:
- i. has annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs);
 - ii. has annual income that is less than or equal to 50% of the area median income, as determined by HUD, AND meets one of the following conditions from paragraph (iii) of the “At risk of homelessness” definition established at [24 CFR 91.5](#):
 1. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 2. Is living in the home of another because of economic hardship;
 3. Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
 4. Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;
 5. Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;
 6. Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
 7. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan

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

3.2 Participant Selection Plan

Prior to enrolling participants in supportive services, each subrecipient must develop a participant selection plan which clearly describes the process by which HOME TBRA Program participants are screened for eligibility and offered HOME-ARP supportive services. Therefore, each subrecipient must review their HOME TBRA participant selection plan in its entirety and make modifications to ensure compliance with both the HOME TBRA and HOME-ARP programs.

All participant selection plans must:

- Incorporate all criteria described in Section 4.4 of the 2022 IHCD HOME TBRA

Administration Manual;

- In addition to the IHCDA HOME TBRA Program’s definition of “formerly incarcerated”, include the HOME-ARP definition of “qualifying populations” (Section 12.3),
- Identify the process by which HOME TBRA participants are identified and referred for HOME-ARP supportive services.

The plan must be approved by IHCDA prior to implementation. Additionally, any proposed changes or additions must be approved to IHCDA prior to implementation. Subrecipients must have written processes for verifying and documenting that a participant is eligible for HOME-ARP Supportive Services in accordance with the approved participant selection plan.

Section 4: Length and Termination of Assistance

Households enrolled in HOME TBRA who are also eligible for HOME-ARP Supportive Services may receive services throughout their term of assistance. Subrecipients must create written policies describing how the type and duration of assistance is determined.

Households determined ineligible for HOME TBRA at recertification or at any time during their period of assistance may continue to receive supportive services for an additional three months following the date of determination of ineligibility to support the household's transition to long-term stability.

The subrecipient must establish policies and procedures for termination of assistance to program participants. In terminating assistance to a program participant, the subrecipient must provide a formal process that recognizes the rights of individuals receiving assistance under the due process of law. This process, at a minimum, must consist of:

1. Providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance;
2. Written notice to the program participant containing a clear statement of the reasons for termination;
3. A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
4. Prompt written notice of the final decision to the program participant.

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

Section 5: Reporting and Claims Submission

5.1 IDIS Report Form

IHCDA is required to submit participant information directly to HUD through their Integrated Disbursement and Information System (IDIS), a HUD software system for HOME and other entitlement funds. Subrecipients must complete an IDIS Report Form entry for all HOME-ARP Supportive Service participants. The IDIS Report Form must be submitted with the monthly claim, as well as emailed to the Supportive Housing Analyst at the same time as the claim submission. IHCDA will enter this information into IDIS. If there are changes in the household information initially provided, these changes must be recorded on the appropriate tab of the IDIS Report Form with the adjustment noted.

The IDIS Report Form is available for download from the HOME TBRA webpage. Additional instructions are included within the form. Questions regarding IDIS Form completion and submission may be emailed to the Supportive Housing Analyst.

5.2 Claims Submission Process

Funds are disbursed on a reimbursement basis through claims submitted to IHCDAOnline at <https://online.ihcda.in.gov/>. Subrecipients must submit claims to IHCDA monthly. For information on how to use IHCDAOnline and submit a claim with the required documentation, please refer to the [Partner's Guide to IHCDAOnline](#). Questions regarding the claims process and access to the system should be submitted to claims@ihcda.in.gov. If the question is regarding eligible activities, please contact the Supportive Housing Analyst. Required claim documentation:

- Claim Summary Pages (generated from IHCDAOnline)
- Other supporting documentation including:
 - General Ledger
 - IDIS Report Form (see Section 5.1)
 - Supportive Services Financial Narrative Form, if applicable
 - Administrative invoices/receipts

5.3 Homeless Management Information System

The Homeless Management Information System (“HMIS”) is a secure, electronic data collection system used to determine the nature and extent of homelessness. Data regarding all homeless individuals assisted with the Program’s grant funds must be entered into either the Indiana Balance of State or the Indianapolis HMIS. IHCDA will determine the HMIS that the subrecipient must use based on the geographic location of the project.

The subrecipient is required to enter participant data at intake and upon discharge of the program, at a minimum, for all participants. The recipient is encouraged to utilize the other features of HMIS such as case notes, service tracking, and reporting functions. The data required for entry into HMIS includes at least the following data elements: Name, Social Security Number, Date of Birth, Race,

Ethnicity, Gender, Veteran Status, Disabling Condition, Residence Prior to Entry, Zip Code, Length of Stay at Previous Residence, Housing Move-in Date, and Exit Destination. The recipient agrees to collect any other data elements as IHCDA directs. For HMIS assistance or to get registered to use the system, please contact the HMIS Help Desk at: hmishelpdesk@ihcda.in.gov.

Section 6: Ongoing Monitoring and Compliance

6.1 Confidentiality Requirements

1. All entities assisted by HOME-ARP funds must develop, implement, and maintain written procedures to require that:
 - a. All records containing personally identifying information of any individual or family who applies for and/or receives HOME-ARP assistance will be kept secure and confidential;
 - b. The address or location of any program participant that is fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking will not be made public, except as provided under a privacy policy of the subrecipient consistent with state and local laws and any other grant conditions from other federal grant programs regarding privacy and obligations of confidentiality.
2. Documenting status of a qualifying population that is fleeing or attempting to flee domestic violence, dating violence, stalking, sexual assault, or human trafficking:
 - a. If an individual or family qualifies because the individual or family is fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking then acceptable evidence includes an oral or written statement by the qualifying individual or head of household seeking assistance that they are fleeing that situation. An oral statement may be documented by either –
 1. A written certification by the individual or head of household; or
 2. A written certification by a victim service provider, intake worker, social worker, legal assistance provider, health-care provider, law enforcement agency, pastoral counselor, or an intake worker in any other organization from whom the individual or family sought assistance.

6.2 Records and Document Retention

The following records must be retained for each household served by the HOME-ARP Supportive Services program for five years after the period of assistance terminates, in addition to the documentation enumerated in the HOME TBRA Administration Manual:

- Documentation supporting the household’s status as a “qualifying population”
- Confidentiality Policies, including the subrecipient’s written policies and procedures for maintaining confidentiality of qualifying households as individuals or families fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking

6.3 Re-allocation Policy

Unclaimed Funds: Funds that were allocated to a specific subrecipient or allocated to IHCDAs' administrative costs that were not claimed by the subrecipient during the grant year or were leftover in the administrative category and not used by IHCDAs.

At any point during a grant cycle IHCDAs may require subrecipients who are behind on the benchmarks defined in their award agreements to provide a spend-down plan for unclaimed funds remaining on their HOME-ARP Supportive Services award. Spend-down plans must be completed on a standard form provided by IHCDAs and must include information on anticipated monthly expenditures for rental assistance and administrative costs. IHCDAs will review all submitted spend-down plans to verify that planned expenditures are reasonable when compared to the subrecipient's claims history and proposed goals for number of households served.

If a subrecipient's spend down plan is determined by IHCDAs to be insufficient to expend the total award amount within the term of the award agreement, IHCDAs may offer the subrecipient a 3-month extension to their award period and/or may de-allocate the portion of the award that is not expected to be spent. If an organization fails to provide a spend-down plan when requested, IHCDAs will review the organization's claim history to determine if they are on track to expend their full award amount. Subrecipients who do not submit the required spend-down plan when requested are not eligible for an award extension and may have a portion of their award de-allocated. IHCDAs will notify subrecipients of any award de-allocation via email with a letter stating the amount by which the award has been reduced. If IHCDAs chooses to allow a grant extension, subrecipients will be notified via email with a letter stating the new grant end date and benchmarks that must be met during the extended period.

HOME-ARP Supportive Services funds de-allocated through this process may be added to the total available award amount under the next HOME-ARP Supportive Services Request for Qualifications or may be allocated to another subrecipient(s) with HOME-ARP Supportive Services awards who have met award benchmarks. Such allocations will follow this policy and will be approved by IHCDAs' Executive Team through delegated authority.

6.4 Award Monitoring

The Supportive Housing Analyst will perform program compliance checks throughout the program year by reviewing monthly reports, claims, and other information.

A more thorough monitoring of the program will also occur. The monitoring review may be done remotely or in person. At least three weeks of notice will be given to the recipient before monitoring begins so that the recipient can prepare using a monitoring checklist. The checklist contains a list of areas that will be reviewed and documents that will need to be made available at the time of monitoring. Upon completion of a monitoring review, IHCDAs will send a letter detailing all concerns and findings discovered during the review. The letter will be sent within 30 calendar days of the monitoring unless an investigation of findings requires more time. If there are findings or concerns discovered, the letter will request the recipient to submit a specific resolution or correction within a certain period of time. Significant deficiencies in program files or other

record keeping that are found during a monitoring will result in required Plans of Corrective Action with possible loss of funds or repayment to IHCDA.