

Housing Stabilization Program (HSP)

July 1, 2019



Housing Stabilization Program Operations Manual

Contacts

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Table of Contents

Contacts	1
1. Program Summary	4
2. Administrative Requirements	4
(A) MGA Operational Standards.....	4
(B) System Wide Performance Requirements.....	4
(C) Training	7
(D) Homeless Coordinated Entry Process.....	7
(E) Persons with Lived Experience Feedback.....	7
3. General Program Requirements	7
(A) Limited English Proficiency	7
(B) Release of Information	8
(C) Confidentiality.....	8
(D) Electronic Confidentiality.....	9
(E) Conflict of Interest	9
(F) Service Termination or Denial of Assistance	10
(G) Grievance and Appeals Process	11
(H) Nondiscrimination.....	11
4. Additional HSP Requirements	12
(A) TANF Collaboration	12
(B) Case Files & Housing Stability Plan	12
(C) Criminal Records Check	13
5. Applicant Eligibility	13
(A) Prioritization	13
(B) Household Composition.....	14
(C) Pregnancy.....	14
(D) Housing Status	14
(E) Income	15
(F) Citizenship and Residency.....	16
6. Eligibility Documentation	19
7. Allowable Client Expenditures	21
(A) General Requirements	21
(B) Ineligible Costs	22
(C) Assistance Payments.....	22
(D) Extensions	23
8. Maintenance of Effort (MOE)	23
9. Financial Management	24
(A) Administration	24
(B) Use of OPUS	24
(C) Request for Funds	25
(D) Budget Change Requests and Implementation Report Amendments	25
(E) Funds Spend Down	25

- (F) Purchasing..... 25
- 10. Data Requirements..... 26
 - (A) Data Entry 26
 - (B) Data Timeliness..... 26
 - (C) Required Data Elements 26
 - (D) Comparable Database..... 27
 - (E) Reporting Requirements..... 28
- 11. Records Requirements 28
 - (A) Records Access..... 28
 - (B) Records Retention..... 28
- 12. Monitoring 28
- 13. Subrecipient Monitoring..... 29
- 14. Appendix 1: Applicable Rules and Regulations 30
- 15. Appendix 2: Acronyms..... 32
- 16. Appendix 3: Definitions 33
- 17. Appendix 4: MOE FAQs..... 38
- 18. HSP CASE ALLOCATION FORM 42

1. Program Summary

The Housing Stabilization Program (HSP) provides temporary financial assistance and support services to stabilize housing for low income eligible families who are homeless or unstably housed and at risk of losing their housing. HSP funds are available for four program components: housing related costs, auxiliary services, case management and data collection.

U.S. Department of Health and Human Services, Temporary Assistance for Needy Families (TANF) federal funds are provided for the program through an interagency agreement with the Oregon Department of Human Services. As pursuant to 45 CFR 260.31, the program's purpose is to assist eligible needy families with non-recurrent, short-term benefits that:

- Deal with a specific crisis situation or episode of need; AND
- Are not intended to meet recurrent or ongoing needs; AND
- Will not extend beyond four months.

HSP requires subgrantees to identify and match TANF Maintenance of Effort (MOE) funds in an amount identified in the funding application TANF MOE funds must not originate with the federal government and are not expended as a condition of receiving federal funds under another program. See detailed information regarding MOE in this manual.

Appendices are included in this manual for common definitions and acronyms, as well as rules and regulations associated with the program.

2. Administrative Requirements

(A) *MGA Operational Standards*

Master Grant Agreement (MGA) Operational Standards are specific identified criteria used to set a foundation of administrative, fiscal and service delivery expectations for community action agencies. The purpose of standing the standards is to ensure that no matter where individuals and families enter the homeless system, Oregonians will be provided the same access to quality services.

Five service delivery components have been included in the MGA Operational Standards. They are:

- (1) The use of Housing First;
The Housing First Model encourages clients to create and implement their own goals while immediately housing or sheltering clients with no preconditions (except complying with a shelter code of conduct or standard lease agreement). Research has shown that Housing First programs increase housing stability for clients serve, are cost effective compared to traditional services that impose sobriety prerequisites to shelter or housing and increase client utilization of other services. More information can be found at:
<https://endhomelessness.org/resource/housing-first> or at
<https://www.usich.gov/solutions/housing/housing-first/>.

- (2) Maximizing participation in Coordinated Entry;
Coordinated entry is a process developed to ensure that all people experiencing a housing crisis have a single or coordinated point of entry and equal access to the homeless delivery system. This type of entry allows homeless persons and those at-risk of homelessness to be quickly identified, assessed, referred and connected to the appropriate shelter or housing, and assistance. It also facilitates the assessing agency's ability to prioritize the most vulnerable individuals and households for immediate assistance. More information can be found in the Homeless Coordinated Entry Process section of this manual and at <https://www.hudexchange.info/resources/documents/Coordinated-Entry-Policy-Brief.pdf>.
- (3) Ensuring availability of low-barrier shelters in the community;
Low and no barrier policies allow homeless individuals and households to access shelter, housing and services without preconditions such as sobriety, compliance with treatment plan, no pets, or agreement to participate in specific programs, activities or classes. These policies allow the most in need to have access to shelter and housing. More information can be found at https://www.usich.gov/resources/uploads/asset_library/emergency-shelter-key-considerations.pdf.
- (4) Incorporating the lived experiences of homelessness into program design and implementation; and
Incorporating the lived experience of homelessness into program design and implementation is a commitment and framework to include everyone, especially people with lived experience, in planning, implementation and evaluation. The Lived Experience Advisory Council in Canada developed seven principles for ensuring equitable participation for people with lived experiences that can further inform inclusion strategies. More information can be found at the Persons with Lived Experience Feedback section of this manual and at <https://www.usich.gov/news/people-with-lived-experience-must-be-meaningful-partners-in-ending-homelessness/> and <https://homelesshub.ca/sites/default/files/LEAC-7principles-final.pdf>.
- (5) Ensuring service provision has components for equity and racial justice.
OHCS is committed to advancing equity and racial justice in alignment with the Statewide Housing Plan and informed by national promising practices and lived experience of communities of color. OHCS and Community Action Agencies commit to an intentional, data-driven approach to reduce disparities in housing and social service provision. Use of the EPIC Outcomes Tool to establish and measure equity and racial justice performance goals will help CAAs to analyze their progress in meeting these goals. More information can be found at the Performance Measure Requirements section of this manual and at <https://www.centerforsocialinclusion.org/our-work/our-four-strategies/>, <http://center4si.com/sparc/>, and <https://www.usich.gov/news/racial-equity-an-essential-component-of-our-nations-homelessness-response/>.

(B) System Wide Performance Requirements

The Oregon Legislative Fiscal office adopted a set of criteria that agencies must meet when developing key performance measures. In alignment with the federal and state strategic plans to end homelessness, OHCS has established two performance measures:

- Increased housing stability as measured by the percentage of total program participants served who reside in permanent housing at time of exit from program; **and**
- Increased housing stability as measured by the percentage of program participants who at program exit reside in permanent housing and maintain permanent housing for six months from time of exit.

In addition to the current two required measures listed above, subgrantees will have the opportunity to choose additional performance measures from four categories – **E**nding Homelessness, **P**reventing Homelessness, **I**nclusion and Diversity, and **C**apacity of the Community (EPIC), as referenced in the Master Grant Agreement. The EPIC Outcomes Tool is a table listing a selection of performance measures and outcomes under each of the four headings.

All performance measures use HMIS as their primary data source, unless otherwise noted.

These outcome measurements will be in addition to reporting of required universal data elements that track client characteristic and service data.

Reporting of the performance measures are required in the year-end report and is client household-based, not funding source. Assistance with HMIS data entry and reporting may be found on our website at: <http://www.oregon.gov/ohcs/Pages/housing-assistance-providers-in-oregon.aspx>.

Locating and following up with clients can be challenging. Strategies that have shown the best results include the following:

- ✓ Follow-up is provided by the case manager or staff whom the client knows and has worked with;
- ✓ Informing the client at time of intake/assessment of the need and value of follow-up and requesting their permission to contact them and/or other identified contacts after they exit the program;
- ✓ Securing multiple points of contact for the client prior to their exit such as a friend, family member, employer, landlord or someone who the client is likely to stay in touch with during the six month period;
- ✓ Utilizing the subgrantee's LIHEAP or OEAP list of clients to verify permanent housing since LIHEAP and OEAP can only be delivered to those residing in permanent housing; and

- ✓ Development of MOUs with other agencies such as DHS, Housing Authorities, CDCs, etc. to determine the housing status of clients.

Regardless of the method of follow-up utilized, subgrantees must obtain client permission through a signed release of information to contact others.

(C) *Training*

Subgrantee and subrecipient staff that provide direct services and supervise staff who provide direct services and manage homeless grants must receive training and demonstrate competency, as documented through the CSBG Organization Standards #5.8 (Board) and #7.9(Staff). Training is an eligible expense of case management and may include:

- Trauma Informed Services
- Mental Health First Aid
- Harm Reduction
- Supporting Victims of Domestic Violence
- Local Coordinated Entry Policies and Procedures
- Fair Housing
- Best Practices in Serving Homeless and Chronically Homeless Families and Individuals

(D) *Homeless Coordinated Entry Process*

Subgrantees and subrecipients are required to actively participate in and promote the Continuum of Care (CoC) coordinated entry process for their service area

(E) *Persons with Lived Experience Feedback*

Subgrantees and subrecipients must develop a systematic approach for collecting, analyzing and reporting client satisfaction data. A person with lived experience feedback system must document the steps the subgrantee and subrecipient will use to review feedback and will include how the persons with lived experience feedback is used or not used. Feedback may be through surveys, participation on advisory boards and other formats and may be received by the subgrantee or subrecipient in person, on paper, by posting through a website or by email or other electronic means.

3. General Program Requirements

(A) *Limited English Proficiency*

The Federal government has issued a series of policy documents, guides and regulations describing how subgrantees and subrecipients should address the needs of citizens who have limited English proficiency (LEP). The abbreviated definition of persons with limited English proficiency is those who: have difficulty reading, writing, speaking, or understanding English, and do not use English as their primary language.

Subgrantees and subrecipients must have a LEP policy document that describes the actions subgrantees and subrecipients took to identify LEP populations in their service area and define actions they will take to provide language assistance and address language barriers. The policy must also state how and how often staff will receive training about assisting LEP persons, how the level of success of the policy will be identified and how changes will be made if needed.

Links to more information about Limited English Proficiency requirements are provided in the appendices “Applicable Rules and Regulations”.

Subgrantees and subrecipients should create a written Language Access Plan (LAP) to provide a framework to document how the agency’s programs will be accessible to all populations in their service area. Subgrantees and subrecipients who serve few persons needing LEP assistance may choose not to establish a LAP; however, the absence of a written LAP does not release subgrantee’s and subrecipient’s obligation to ensure LEP persons have access to programs or activities.

(B) Release of Information

Client information (including identifying the person as a client) should not be released without written authorization from the client. Subgrantees and subrecipients are required to have a signed agency Release of Information form for each adult member of the identified household authorizing the release of information pertinent to determining program eligibility, providing assistance/service, HMIS reporting and other relevant need for sharing information. Each adult member must complete and sign their own ROI privately and ROIs cannot be shared with other household members. Unaccompanied youth who are the head of household must also have a signed Release of Information form on file. Release forms must be time-limited and specific as to with whom and what information will be shared.

OHCS and the Department of Human Services are required to be listed as an entity with which client information will be shared as it pertains to data collection and monitoring (including third-party audits and reviews).

In addition, any Release of Information form must include the option of alternative formats including native languages, Braille, large print, computer disk and oral presentation. The MSC3010 form from DHS meets this obligation.

Client refusal to sign a Release of Information must be documented, dated and kept in the client file. Client refusal to sign such authorization **cannot** be the basis for denying program services to otherwise eligible clients.

(C) Confidentiality

DHS has determined that the HSP directly relates to the administration of the TANF public assistance programs. TANF confidentiality rules apply to clients who receive HSP services and TANF benefits (see Applicable Rules and Requirements appendix of this manual).

Subgrantee and subrecipient agencies must have policies and procedures that ensure all client information and records are secure and confidentially maintained. Subgrantee and subrecipient officers, employees and agents must be aware of and comply with the subgrantees' and subrecipients' confidentiality policies and procedures.

Confidential records includes all applications, records, files, and communications relating to applicants for, and clients of, HSP funded services.

The confidential policy standards maintained by the subgrantee and subrecipient agencies must comply with all applicable local, state and federal requirements. All records shall be open for review to federal, state, and subgrantee agency auditors and/or examiners in the course of their regular audits and monitoring functions of HSP funded programs.

Note to Domestic Violence Providers:

Subgrantee and subrecipient agencies must have procedures that ensure the safety and security of program participants who are victims of domestic violence including maintaining strict confidentiality of records. Additionally, the address and location of HSP funded domestic violence shelter facilities must be protected from public disclosure except as authorized by the director of the organization responsible for operations of the shelter.

(D) *Electronic Confidentiality*

Electronic collection of client information requires procedures for ensuring confidentiality including:

- Computer terminals must be located in a secure location, limiting access to only those persons who have a legitimate interest in and are responsible for client records;
- Computer monitors must be cleared (or a screen saver activated) immediately after accessing a client record;
- Computer terminals must be on a "locked" mode or turned off if the terminal is unattended; and
- Access to personally identifiable HMIS data shall be given to only authorized personnel as necessary for performing the work required for the HSP.

(E) *Conflict of Interest*

Subgrantee and subrecipient must keep records to show compliance with program conflict of interest requirements.

(1) Organizational

The provision of any type or amount of assistance may not be conditioned on an individual's or household's acceptance or occupancy of emergency shelter or housing owned by subgrantee, subrecipient or an affiliated organization. Conflict of interest waivers regarding rent assistance and rental agreement requirements

can only be approved by OHCS. If a subgrantee or subrecipient wishes to apply for a waiver, they should contact the OHCS homeless program analyst or manager for guidance in submission of a waiver request, which must be approved by OHCS.

A subgrantee and subrecipient may conduct a participant's intake assessment to determine program eligibility if the participant resides in housing where the subgrantee or subrecipient has ownership interest for the expediency of housing placement services and to create seamless service delivery while keeping the client engaged in services. A waiver of the conflict of interest policy for this purpose is not required for EHA/SHAP.

Subgrantees and subrecipients cannot steer potential renters to units owned or operated by the subgrantee or subrecipient, if the renters will be using a rent subsidy paid with any OHCS funds. Rent-subsidized tenants are free to enter into a rental contract with another landlord within the subgrantee or subrecipient's jurisdiction or they may choose to rent a unit owned or operated by the subgrantee or subrecipient. A waiver request is not required for this situation; however, subgrantees and subrecipients must comply with this provision of the conflict of interest policy.

(2) Individual

For the procurement of goods and services, subgrantee and subrecipient must comply with the codes of conduct and conflict of interest requirements under 24 CFR 85.36 (for governments) or 24 CFR 84.42 (for private nonprofit organizations).

Persons for whom the conflict of interest requirements apply include any person who is an employee, agent, consultant, officer or elected or appointed official of the subgrantee or subrecipient agency. No person who exercises or has exercised any functions or responsibilities with respect to activities assisted under the programs, or who is in a position to participate in decision-making processes or gain inside information with regard to activities assisted under the programs, may obtain a financial interest or benefit from an assisted activity; have a financial interest in any contract, subcontract or agreement with respect to an assisted activity; or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has a family or business tie, during his or her tenure or during the one-year period following his or her tenure.

(F) *Service Termination or Denial of Assistance*

Subgrantees and subrecipients must have written termination, denial, and grievance policies and procedures. The policies and procedures should be readily available to program participants either at intake or by posting the policy in a public place. It is important to effectively communicate these policies and procedures to applicants/clients and ensure they are fully understood.

Subgrantees and subrecipients are required to provide written notice to applicants/clients when denied program assistance or assistance is terminated. The notice must include the specific reason(s) for the denial/termination and identify the steps to appeal the subgrantee's and subrecipient's decision.

(G) *Grievance and Appeals Process*

Subgrantees and subrecipients are required to have an established, written process for addressing client grievances for decisions, including termination or reduction of benefits, denial of benefits or other grievance. At a minimum, the process must include the following components:

- Informs the participant/applicant of the policy and policy must be posted in general locations in which a client/applicant is expected to be;
- Informs the participant/applicant that they may contest any subgrantee's or subrecipient's decision that denies (for any reason) or limits eligibility of participant/applicant and/or terminates or modifies any benefits and identifies the steps to follow to contest the decision;
- Allows any aggrieved person a minimum of thirty days within which to request an administrative review;
- Informs the applicant/participant of their right to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the decision;
- Informs OHCS of the request for administrative review within 10 days of receiving the request;
- Informs the applicant/participant and OHCS in writing of the final determination and basis for the decision within ten days of the determination.

Any person or persons designated by subgrantee and subrecipient can complete the administrative review, other than the person who made or approved the decision under review or a subordinate of this person.

Subgrantees and subrecipients must make accommodations for clients who have language or disability barriers that would prevent them from participating in the appeals process.

OHCS retains the right to require modification of any review or appeals process that in its determination does not meet basic principles for notification, instruction, time allowance, impartiality, access and other necessary components.

(H) *Nondiscrimination*

Subgrantees and subrecipients are required to comply with all state and federal statutes relating to nondiscrimination. Subgrantee and subrecipients may not take any of the following actions based on race, color, national origin, religion, gender, familial status or disability (federal) or marital status, sexual orientation, gender identity or source of income (state):

- Refuse to accept an application for housing assistance or services
- Deny an application for housing assistance or services
- Set different terms, conditions or privileges for housing assistance or services
- Provide different or specific housing, facilities or services
- Falsely deny that housing is available for inspection or rental or that services are available
- Deny anyone access to a facility or service.

The Fair Housing Act prohibits discrimination based on protected classes in the housing activities of advertising, screening and unit rentals. Using a target population in screening is allowed; however, refusal to accept application or provide information on services or available housing to any protected class, even if these groups do not fit into your targeting strategy is prohibited.

For example, a provider might decide to give priority to clients who graduate from a rental rehabilitation program that is inclusive of all protected classes. If two applications come in at the same time and both meet the screening criteria, the applicant who also has the rental rehabilitation experience could receive priority over the applicant who does not; however, providers should always accept the first applicant meeting their criteria or prioritization policy.

Screening criteria cannot be discriminatory and must be consistently applied.

For more information, see the *Guide to Fair Housing for Nonprofit Housing and Shelter Providers* produced by the Fair Housing Council of Oregon, or contact them directly at www.fhco.org.

4. Additional HSP Requirements

(A) *TANF Collaboration*

Communication between DHS staff and local CAAs administering HSP is fundamental to maximizing housing-related assistance for families in a more holistic approach while avoiding duplication of benefits or services. Collaboration with DHS case managers is required. Subgrantees must coordinate with their local DHS offices to write and sign a collaboration plan that is submitted through the MGA Funding Application.

(B) *Case Files & Housing Stability Plan*

Case management is an expectation for the delivery of HSP funds.

Documentation of client eligibility and services received must be maintained in printed form or electronically-saved and with client case files. Files for applicants found to be ineligible for assistance or for clients who are no longer eligible to receive assistance documentation must include why they are ineligible and how that was determined.

File documentation will be the basis of OHCS monitoring to ensure subgrantee and subrecipient are in compliance with program requirements and regulations.

Case allocation plans **are required for all HSP clients** and identifies how funds are allocated to the client. When completed in their entirety and inclusive of this information, referral forms by DHS may take the place of the case allocation plan.

Development of a **housing stability plan is required** and should include an assessment related to housing barriers. The plan needs to identify how HSP funds/services provided will address such barriers to housing stability. Existing assessments and active case plans with other providers may be used and included in the client file. Subgrantees and subrecipients can request copies of assessment and case plans from DHS for those clients receiving TANF. A *Barriers to Housing Stability Assessment/Plan* is available in the sample forms located on the OHCS website.

Co-case planning with DHS is required as part of your collaboration plan to address client needs and to develop a housing plan. Co-case planning with DHS will further develop effective case management strategies for each client.

(C) Criminal Records Check

Subgrantee and subrecipient agencies must verify that any employee working with HSP households do not have a conviction of child abuse, offenses against persons, sexual offenses, child neglect, or other offense bearing a substantial relation to the qualifications, functions or duties of an employee scheduled to work with HSP households.

“Criminal records check” means obtaining and reviewing criminal records and includes any or all of the following for at least the state of Oregon:

- (1) Obtain an Oregon criminal records check from Oregon State Police (OSP) using the Law Enforcement Data System (LEDS). The Oregon criminal records check may also include a review of other criminal information [http://www.oregon.gov/OSP/ID/Pages/public_records.aspx];
- (2) Request a national criminal records check where criminal records are obtained from the Federal Bureau of Investigation (FBI) through the use of fingerprint cards and other identifying information sent to OSP; or
- (3) Obtain a state-specific criminal record check from law enforcement agencies, courts, or other criminal records information resources located in, or regarding, a state or jurisdiction inside and/or outside Oregon.

5. Applicant Eligibility

(A) Prioritization

Subgrantees and subrecipients shall ensure **priority** (see definitions section) of HSP services is given:

- (1) First to households applying for or receiving TANF; and
- (2) Second to households who are not applying or receiving TANF, but who meet HSP eligibility requirements.

(B) Household Composition

- (1) The Eligibility Group **must** include at least the following people:
 - A Dependent Child, **AND**
- (2) Parent or Caretaker Relative living with Dependent Child, and, if applicable, their spouse and children. Self-certification of caretaker relative status, either by a document signed by the caretaker relative or by appropriate case notes that self certification occurred, is sufficient, unless caretaker relative status is questionable and then third-party documentation is required.
- (3) Dependent Child: In order to receive HSP, at least one dependent child from the eligibility group **must** meet citizenship (or qualified non-citizenship status) and have a social security number or have applied for one. If the dependent child is an unborn child and the mother is ineligible due to not meeting citizenship requirements, the household is not eligible until the child is born (see Section 5C: Pregnancy). If the only eligible dependent child is in foster care and in the process of reunification, subgrantee and subrecipient shall confirm with DHS the plan, timeline and requirements for reunification. If subgrantee determines obtaining housing within 4 months from the date of receiving HSP services allows the eligible child to rejoin the household, the household will be eligible for HSP assistance. Subgrantee and subrecipient must retain appropriate documentation in the applicant file of their contact/s with DHS personnel. In cases where there is DHS documentation of TANF or a written DHS referral for HSP assistance of a TANF client, no additional dependent child documentation in the file is required.
- (4) Categorical Eligibility: In cases where there is DHS documentation that the eligibility group is receiving TANF (EBT cash benefits), then the eligibility group is **categorically eligible** to receive HSP, without meeting any other financial or non-financial eligibility criteria. Households must still meet the housing status requirements; however, in cases where there is a written referral from DHS indicating housing status, no further documentation is required.

(C) Pregnancy

A parent/caretaker relative whose only child is an unborn may be eligible when the mother's pregnancy has reached the calendar month before the month in which the due date falls. (For example, if the due date is June 20, the mother of an unborn may be eligible for HSP as early as May 1). The client's written statement that a medical practitioner, health department, clinic crisis pregnancy center or like facility verified the pregnancy is adequate for verification. This requirement may be waived in situations of domestic violence. A domestic violence client could be at any stage of pregnancy to qualify.

(D) Housing Status

The eligibility group **must** meet one of the following categorical definitions of homeless or at risk of becoming homeless. In cases where there is a written referral from DHS indicating housing status, no further documentation is required.

Category 1: Literally Homeless—household who lacks a fixed, regular, and adequate nighttime residence, meaning:

- Living in 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;
- Living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, or hotels and motels paid for by charitable organizations or by federal, state or local government programs); **OR**
- 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.

Category 2: Imminent Risk of Homelessness—household who will imminently lose their primary nighttime residence provided that:

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

Category 3: Homeless Under Other Federal Statutes—unaccompanied youth under 25 years of age, or family who do not otherwise qualify as literally homeless or imminent risk of homelessness, but who:

- Are defined as homeless under other listed federal statutes;
- Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the program assistance application; **AND**
- Have experienced persistent instability as measured by two moves or more during the preceding 60 days; and can be expected to continue in such status for an extended period of time due to special needs or barriers.

Category 4: Fleeing/Attempting to Flee Domestic Violence—household who:

- Is fleeing, or is attempting to flee, domestic violence;
- Has no other safe residence; **AND**
- Lacks the resources or support networks to obtain other permanent housing.

Category 5: Unstably Housed—household who:

- Is at risk of losing their housing, and does not otherwise qualify as homeless under the above listed (1-4) categories, provided that:
- They have been notified to vacate current residence or otherwise demonstrate high risk of losing current housing; **AND**
- Lack the resources or support networks to obtain other permanent housing.

(E) Income

Income includes the current gross income of all adult household members at the time of assessment. Income earned by household members who are minors or full-time students **and** are not considered heads of household is excluded. Documentation of

income for 30 days prior to the assessment must be kept in the applicant file. If income statements are not available for 30 days prior to the assessment, applicant must self-certify the previous 30 days of income.

Convert periodic wages to annual income by multiplying:

- 1. Hourly wages by the number of hours worked per year (2,080 hours for full-time employment with a 40-hour week and no overtime);*
- 2. Weekly wages by 52;*
- 3. Bi-weekly wages (paid every other week) by 26;*
- 4. Semi-monthly wages (paid twice each month) by 24; and*
- 5. Monthly wages by 12.*

To annualize other than full-time income, multiply the wages by the actual number of hours or weeks the person is expected to work.

- (1) **Income Limits:** Count the income of every person in the eligibility group, except SSI income, to determine financial eligibility for HSP. The countable income limit for HSP and MOE is at or below **250%** of the Federal Poverty Level. Find Federal Poverty Guidelines at <http://aspe.s.gov/poverty/>. In cases where there is DHS documentation of TANF or a written DHS referral for HSP assistance of a TANF client, no additional income documentation in the file is required.
- (2) **TANF Grant as Unearned Income:** TANF grants (EBT cash benefits) received in the month of application are unearned income for HSP applicants and are included in the income calculation.
- (3) **SSI Benefits as Unearned Income:** For the purpose of eligibility, during the month of application, exclude SSI monthly income when calculating income. However, if the household income is within the HSP income guidelines, any available income or resources regardless of their source (such as SSI), will be used to establish the amount of HSP benefits offered.
- (4) **Resource Limit:** The resource limit is \$2,500 for all eligibility groups. In cases where there is DHS documentation of TANF or a written DHS referral for HSP assistance of a TANF client, no additional resource limit documentation in the file is required. Resources can be verified through applicant self certification.

(F) *Citizenship and Residency*

- (1) **Citizen/Qualified Non-Citizen Status:** At a minimum, the eligible, dependent child must be a US citizen or Qualified Non-Citizen, except in situations of domestic violence, and documentation attesting to citizenship or qualified non-citizen status must be in the file. In cases where there is DHS documentation of TANF or a written DHS referral for HSP assistance of a TANF client, no additional citizenship documentation in the file is required. [See definitions of Citizen/Qualified Non-Citizen Status in this section for more information]; **AND**
- (2) **Social Security Number:** At a minimum, the eligible, dependent child must have, or be applying for, a SSN. In cases where there is DHS documentation of TANF or a

written DHS referral for HSP assistance of a TANF client, no additional SSN documentation in the file is required.

- (3) Non-Applicants: Members of the eligibility group who do not wish to provide their citizenship or immigration status or SSN may elect to be a non-applicant. Exclude non-applicants from the eligibility group as an ineligible household member and do not require them to disclose information about their citizenship or immigration status or SSN as a condition of HSP eligibility. His or her failure to disclose this information will not affect the potential eligibility of other family members; however, consider any income or resources provided by the non-applicant available to the eligibility group and include them in the financial eligibility calculation.

Family or household members who are not seeking benefits may designate themselves as non-applicants early in the eligibility process. Applications will not be delayed, discontinued or denied because non-applicant household members do not provide their citizenship, immigration status or SSN.

- (4) U.S. Citizen

A U.S. citizen includes the following people:

- (a) A person born in the U.S.;
- (b) A naturalized citizen;
- (c) A person born outside of the U.S., but whose parents (both mother and father) are U.S. citizens;
- (d) A person born outside of the U.S., who is over 18 years of age, but who has at least one parent who is a U.S. citizen. The person must either have a certificate of U.S. citizenship or meet one of the following criteria:
 - (i) Born on or after December 24, 1952, and prior to November 14, 1986, and their citizen parent was physically present in the U.S. or its outlying possessions for 10 years or more, at least five of which were after age 14;
 - (ii) Born on or after November 14, 1986, and their citizen parent was physically present in the U.S. or its outlying possessions five years or more, at least two of which were after age 14.
- (e) A child born outside of the U.S., who is under 18 years of age and has at least one parent who is a U.S. citizen. The child is residing in the U.S. in the legal and physical custody of the citizen parent pursuant to a lawful admission for permanent residence;
- (f) A person lawfully adopted by U.S. citizens;
- (g) A citizen of Puerto Rico, Guam, the Virgin Islands, the Northern Mariana Islands (Saipan, Tinian, Rota and Pagan), American Samoa and the Swains Islands.

- (5) Qualified Non-Citizen

Qualified non-citizens are individuals who are admitted to the United States with a lawful immigrant status. The person who is granted that status either enters the United States as a lawful permanent resident or will be eligible to become a lawful permanent resident in the future. A lawful permanent resident is eligible to be

naturalized as a U.S. citizen usually after five years of lawful permanent residency in the U.S.

A qualified non-citizen includes the following people:

- (a) A person who is lawfully admitted for permanent residence under the Immigration and Nationality Act (INA);
- (b) A person who is admitted to the United States as a refugee under section 207 of the INA;
- (c) A person admitted to the United States under the Trafficking Victims Protection Act of 2000;
- (d) A person who is granted political asylum under section 208 of the INA;
- (e) A person whose deportation is being withheld under section 243(h) of the INA;
- (f) A person who is paroled into the United States under section 212(d)(5) of the INA;
- (g) A person who is granted conditional entry pursuant to section 203(a)(7) of the INA as in effect prior to April 1, 1980
- (h) Battered immigrant spouse, battered immigrant child, immigrant parent of a battered child or an immigrant child of a battered parent, with a petition under 204(a)(1)(A) or (B) or 244(a)(3) of the INA;
- (i) Cuban/Haitian persons who are either public interest or humanitarian parolees; or
- (j) A person granted immigration status according to the Amerasian Homecoming Act, section 584(a) of the INA.

(6) Additional Qualified Non-Citizens

The following people also meet qualified non-citizen status requirements for HSP:

- (a) American Indians born in Canada; or
- (b) Non-citizens (regardless of INS status) who are currently victims of domestic violence or are at risk of victimization by domestic violence.

(7) Non-Qualified, Non-Citizen

Non-qualified non-citizens are:

Individuals who may be admitted lawfully into the United States but do not have immigrant status (i.e., they may stay here for a specific period, but cannot stay in the country for longer than their travel visa allows them). Foreign students, tourists, diplomats, performers, artists, entertainers, certain private company employers, etc., are included in this category.

If there any further questions on non-citizens, find the information at the following link of the DHS Family Services Manual:

<https://apps.state.or.us/cf1/EligManual/EMnIframe.htm?Page+ID=15-toc>

(8) Residency

Program applicants must be residents of Oregon and intend to remain in Oregon.

6. Eligibility Documentation

- (1) Documentation of all applicant eligibility information must be available in applicant files or if kept electronically, available upon request in the format requested. Documentation of all efforts to obtain higher preference of verification (3rd party and Intake Worker Observation) when lower forms of preference are used, must be in writing and kept in the applicant file.
- (2) Verification and related documentation must be maintained within the following specific areas:
 - Homeless/Housing status (or DHS Referral form for HSP services for a TANF client indicating housing status)
 - Citizenship/Qualified Non-Citizen Status (or DHS documentation of TANF status or DHS Referral form for HSP services of a TANF client).
 - Social Security Number (SSN) or application for a SSN (or DHS documentation of TANF status or DHS Referral form for HSP services of a TANF client).
 - Pregnancy status, if using pregnancy to meet eligibility requirements. The client's written statement that a medical practitioner, health department, clinic crisis pregnancy center or like facility verified the pregnancy is adequate for verification.
 - Reasonable return (typically, of less than 30 days) for a minor child from foster care, where applicable
 - Income, resources and/or TANF benefit (or DHS documentation of TANF status or DHS Referral form for HSP services of a TANF client).
 - Dependent child eligibility (birth/hospital certificate) (or DHS documentation of TANF status or DHS Referral form for HSP services of a TANF client).
 - Oregon residency status
 - Caretaker/relative status to Eligible Dependent Child (identity documents, or DHS documentation of TANF status, DHS Referral form for HSP services of a TANF client or self-certification either by caretaker relative or by case notes, unless questionable, then by 3rd party documentation).
- (3) OHCS requires program staff to comply with the following general documentation standards listed in order of preference:
 - **Third-party documentation**, where it is available, is the preferable form of documentation. Third party includes verification from an employer, landlord, public benefit worker, agency service provider, etc. Written verification directly to program staff or via the applicant is preferred.
 - **Intake Worker Observation** may include oral statements made by a social worker, case manager, or other appropriate official at an institution, shelter, or other facility and documented by the intake worker. When the Intake Worker is unable to obtain a written or oral statement from a shelter, institution or facility staff, the Intake Worker must document, in writing, their efforts to obtain eligibility documentation and must place their documentation in the client's file.

- **Applicant Self-Certification** requires a written and signed document by the individual or head of household seeking assistance attesting to the facts for which they are certifying.

(4) Simplified Documentation Option

When a subgrantee or subrecipient moves an active client from HSP to EHA, SHAP or Elderly Rental Assistance (ERA) programs or an active client moves between state funds (EHA, SHAP, ERA), they may choose to use a simplified documentation process for the client's homeless status and income; whereby the subgrantee or subrecipient case manager verifies that the client meets the homeless status and income of the funding source at the time of entry and that the client is eligible for the funding source to which they are moving, without requiring additional documentation. Documentation from the original source of funding must be readily accessible for monitoring purposes. To use the Simplified Documentation Option, there can be no lapse in service from one program to the other.

Subgrantee and subrecipient may use the sample form provided on the OHCS website to document the client file using this simplified documentation option.

Emergency Solution Grant (ESG) and HOME Tenant Based Assistance (HTBA) funds still require separate documentation and are not subject to a simplified documentation option.

(5) Domestic Violence Waiver of Eligibility Requirements:

Pursuant to a determination of good cause, some non-financial and financial eligibility requirements may be waived in cases where compliance with such requirements would make it more difficult for the household receiving assistance under this part to escape domestic violence or unfairly penalize such household who are or have been victimized by such violence, or households who are at risk of domestic violence, with the following exceptions:

- (a) The household must still include a dependent child; AND
- (b) The household must still be income eligible; however, you may waive income eligibility if attempting to use the resources would subject the applicant to risk of domestic violence or if the applicant is using the resource to avoid the abusive situation. Income of the eligibility group may include only the income that is immediately available for the group to meet the need. The eligibility group includes only the members who are fleeing from the domestic violence situation.

If client is at any stage of pregnancy and is using pregnancy as a means of eligibility, use the effective date for when you provide the services and you may waive the time limit used for pregnancy eligibility. (see section 2.B. of this manual for using pregnancy as eligibility)

Documentation that applicant meets requirements for use of a domestic violence eligibility waiver must be included in applicant file.

7. Allowable Client Expenditures

(A) General Requirements

Issue HSP payments to meet household needs, which other programs or other resources immediately available do not meet and that are necessary to stabilize the client's ability to obtain/retain housing, as documented in the client case plan.

HSP funds shall be provided only for reimbursement of allowable costs incurred by subgrantee. HSP assistance cannot be paid directly to clients, but must be paid to the vendor (e.g., landlord, utility company, etc.). Documentation of client expenditures must be included in the client case file.

As pursuant to 45 CFR 260.31, allowable expenses are to be Non-Recurrent, Short-Term Benefits that:

- Deal with a specific crisis situation or episode of need; **AND**
- Are not intended to meet recurrent or ongoing needs; **AND**
- Will not extend beyond four months.

Eligible applicants may receive HSP assistance for one or more of the following expenditures/services:

(1) Housing Costs including, but not exclusive to:

- (a) rent and rent arrears
- (b) mortgage
- (c) costs for room and board at a domestic violence shelter, emergency shelter, or “safe home”
- (d) property taxes, for up to one year, if necessary to avoid foreclosure
- (e) late fees
- (f) move-in fees
- (g) security deposit (last month rent is also allowable)
- (h) application fee
- (i) utility payments/deposits/arrearages
- (j) moving costs
- (k) motel voucher until rental unit available
- (l) costs of home repairs necessary to make the applicant’s housing habitable and if less costly than moving to other shelter

(2) Auxiliary Services include but are not exclusive to:

- (a) Employment related
 - (i) job readiness classes
 - (ii) fees for identification/birth certificate/transcripts
 - (iii) clothing-related expenses
 - (iv) supplies (i.e. tool belt), and
 - (v) child care
- (b) Transportation
 - (i) bus passes
 - (ii) other public transportation costs

- (iii) fuel
 - (iv) car repairs
 - (v) insurance
 - (vi) licensing fees
- (c) Self-Sufficiency
 - (i) energy education
 - (ii) budgeting education
 - (iii) tenant readiness
 - (iv) health and safety
 - (v) Other expenses as approved by OHCS (includes basic home furnishing).
- (3) **Case Management Costs** (see definitions section)
- (4) **Data Collection Costs**: include, but not exclusive to:
 - (a) HMIS licenses;
 - (b) Data entry;
 - (c) Equipment upgrade; and
 - (d) Staff training.

(B) Ineligible Costs

HSP cannot be used to purchase gift cards for participants for any purpose, with the exception of transportation (see definition of transportation payments).

(C) Assistance Payments

Households may receive up to \$8,000 of assistance during a (4) four-month period. If a household has a housing stability plan, they must comply with their plan during the four months. Housing Stability Plans are required only for those households receiving more than one-time only assistance.

The four-month period begins on the date of the first payment, regardless of what service is provided, including case management paid with HSP. There is no limit to the number of payments a household may receive during the four month period as long as all payments are equal to or less than the maximum amount of \$8,000 and as long as all payments are for eligible costs. Include all payments in the Case Allocation Plan and amend the plan as needed.

If any member in the eligibility group received HSP benefits in the past 12 months in Oregon, consider the entire eligibility group as having received benefits and they do not meet eligibility requirements. (This does not include the four-month period of current benefits). When possible, verify previous payments with ServicePoint or subgrantee agency case records.

Use of other OHCS resources (such as EHA) is encouraged to continue assisting HSP clients past the four month limitation of HSP funds. Many client barriers to housing stability cannot be fully addressed in four months. Continued case management and

collaboration with DHS can help to ensure long-term housing stability and produce more effective client outcomes.

(D) Extensions

If the household exits HSP, but returns for additional assistance before their four-month period of assistance has ended, the case manager can issue additional payments up to the assistance limit. The eligibility group must continue to meet all program eligibility requirements. The case manager must amend the case allocation plan to reflect the additional payment(s).

Extensions beyond a four-month period are not allowed.

8. Maintenance of Effort (MOE)

Allowable MOE expenditures that are made on behalf of an eligible needy household, must comply with HSP allowable client expenditures within the four (4) month time HSP expenditure limitation as detailed in this manual.

MOE funds can serve families whose income is at or below 250% of the Federal Poverty Level (FPL), as long as the allowable MOE requirements are met. MOE requirements are:

- (1) Eligible families with income up to 250% of FPL, must also have a
- (2) Qualifying child, be a
- (3) Citizen or have Qualified Non-Citizen Status (see Section 2 for eligibility); be a
- (4) Resident of Oregon, and have a
- (5) SSN (see Section 2 for eligibility); and
- (6) Meet one of the four purposes of TANF:
 - (a) assisting needy families, so that children can be cared for in their own homes;
 - (b) reducing the dependency of needy parents by promoting job preparation, work and marriage;
 - (c) preventing out-of-wedlock pregnancies; and
 - (d) encouraging the formation and maintenance of two-parent families.

Countable TANF MOE funds are other state, county, local governments, and other such public or private funds. MOE must be “matched”, both for program and administrative funds, at a rate determined by OHCS during the funding application process. MOE can be:

- (1) Cash, or
- (2) Third party in-kind contributions, such as volunteer services, or professional services. In-kind services must be identified through a MOU with partner organizations. **OHCS must approve the methodology used for valuation prior to including the value on the quarterly report.**

MOE funds must not be otherwise counted towards a federal cost-sharing or matching requirement. Examples of cash and in-kind MOE funds can be found on the OHCS website for providers.

Expenditures counted towards MOE cannot exceed the limitation of assistance as identified for HSP

9. Financial Management

(A) **Administration**

Subgrantee agencies are allowed to use up to ten percent (10%) of their total allocation for administrative costs, including costs allowed for subrecipient organizations with whom the subgrantee agency contracts.

Allowable administrative costs benefit the organization as a whole and cannot be attributed specifically to a particular program. All amounts billed to administration must be supported by actual costs.

Allowable costs include but are not limited to:

- (1) Senior executive management personnel salaries and benefits (unless they are directly involved in program operations), administrative staff travel costs;
- (2) General services such as accounting, budget development, personnel, contracting, marketing, agency audit, agency insurance;
- (3) Board expenses;
- (4) Organization-wide membership fees and dues specific to homeless systems and programs;
- (5) General agency facilities cost (including those associates with executive positions), such as rent, depreciation expenses, and operation and maintenance (as part of the organization's direct or indirect cost allocation plan); **and/or**
- (6) Equipment rental/purchase, insurance, utilities and IT costs, that are not program specific, but relate to the administration of the agency as a whole.

Expenditures counted toward MOE for administrative funds cannot exceed ten percent (10%) of the total allocation.

(B) **Use of OPUS**

The OPUS System is a web-based centralized data system designed to meet business-processing needs. Subgrantee staff must complete training before being authorized to use the fiscal operations program of OPUS. Training is provided by the Fiscal Grant Specialist at OHCS.

OHCS maintains an OPUS Manual and OPUS Help Desk. Staff can be reached at:

Email: opushelp@oregon.gov

Ph: (503) 986-2099

Toll Free: (800) 453-5511 Option 6

(C) Request for Funds

Subgrantees must retain supporting documentation of all costs charged to the applicable grant and be able to provide evidence that grant funds were spent on allowable costs. When subgrantee submits a Request for Funds (RFF) on OPUS, they are required to download documentation of the costs for which they are requesting payment. Any RFF submitted without accompanying documentation or with insufficient documentation will be returned to the subgrantee with instructions to provide additional information. Timely submission of RFFs are crucial for HSP. Submit RFFs frequently and ensure that **ALL RFFs are submitted for each fiscal year by July 30th of each fiscal year.**

(D) Budget Change Requests and Implementation Report Amendments

Changes in a subgrantee's scope of work may necessitate the submission of a budget change request. All budget changes require OHCS approval by submitting a Budget Change Request form electronically to: mga.fiscal@oregon.gov.

At the discretion of OHCS, additional information or an Implementation Report Amendment Request form may be required for a budget change request.

Implementation Report Amendments are required when there is a shift in program delivery and/or scope of work. All Implementation Report Amendments require OHCS approval by submitting an Implementation Report Amendment Request form electronically to: crd.reports@oregon.gov.

Subgrantees must notify, within 30 days, and receive approval from OHCS when adding subrecipients. Notification and approval normally occurs during the Master Grant Agreement funding application process; however, if changes are made outside of the funding application, subgrantees must notify OHCS and obtain approval by submitting an Implementation Report Amendment Request form electronically to crd.reports@oregon.gov.

(E) Funds Spend Down

Subgrantees are expected to fully obligate or expend grant funds during each funding cycle and after expending funds from a previous funding cycle. OHCS will review subgrantee's grant spending in accordance with subgrantee's Master Grant Agreement and OHCS policy. Contact your OHCS Program Analyst for any questions regarding your expenditure of funds.

(F) Purchasing

Purchases of equipment or property are subject to additional provisions and requirements as stated in the Master Grant Agreement Standard Terms and Conditions and Special Provisions exhibits. Fixed assets with a value greater than \$5,000, includes computer equipment, electronic equipment, photography equipment, hand tools and other items. Title to all equipment purchased in whole or part with OHCS funds must be in the name and possession of the subgrantee. Subgrantee shall prohibit its

subrecipients from using OHCS funds to purchase equipment. Disposal of any item having an original cost of more than \$5,000, and which is currently valued above \$5,000, requires prior OHCS consent. Property and equipment purchased with OHCS grants shall not be used for collateral or to secure financing.

Purchasing contracted services should only occur when the skills, knowledge and resources are not available within subgrantee's organization or the subgrantee is unable to complete the work within require time limitations. A contractor must be registered to do business in Oregon and have necessary credentials of expertise. Subgrantee is expected to obtain multiple bids or pricing. If using a sole source contract, subgrantee must have written documentation to explain why they were not able to obtain more options.

10. Data Requirements

(A) Data Entry

Subgrantee and subrecipient agencies are required to enter HSP related client and service data into the ServicePoint Homeless Management Information System (HMIS), except for data of victim services providers, which must be entered into a comparable database system that meets HMIS standards. Projects serving survivors of domestic violence where the operator is not a victim services provider are required to enter data in their HMIS. Subgrantees and subrecipients are responsible for acquiring and documenting informed written consent from program participants, and protecting program participants' confidentiality.

Additional guides and assistance with HMIS data entry, data quality and reporting may be found on our website at: <http://www.oregon.gov/ohcs/Pages/housing-assistance-providers-in-oregon.aspx>.

(B) Data Timeliness

Timely and accurate data entry is critical to ensuring meaningful data analysis and reporting. Therefore, it is recommended that subgrantees and subrecipients enter data within three business days.

(C) Required Data Elements

HMIS Universal and OHCS-required Data Elements that must be collected include, but are not limited to:

- (1) Name
- (2) Social Security Number
- (3) Date of Birth
- (4) Race
- (5) Ethnicity
- (6) Gender
- (7) Veteran Status

- (8) Disabling Condition (inclusive of type)
- (9) Income and Sources
- (10) Non-Cash Benefits
- (11) Health Insurance
- (12) Living Situation
- (13) Project Start Date
- (14) Project Exit Date
- (15) Housing Move-In Date
- (16) Destination
- (17) Relationship to Head of Household
- (18) Client Location

(D) Comparable Database

Victim service providers are prohibited from entering data in HMIS; however, they are required to maintain comparable databases which provide aggregate information and data consistent with HMIS data collection requirements.

Comparable Databases must have the following characteristics:

- The victim service provider controls who can access and see client information.
- Access to the database is carefully controlled by the victim service provider.
- Meets the standards for security, data quality, and privacy of the HMIS within the Continuum of Care. The Comparable Database may use more stringent standards than the Continuum of Care's HMIS.
- Complies with all HUD-required technical specifications and data fields listed in HMIS.
- Be programmed to collect data with the most up-to-date HMIS Data Standards.
- Have the functionality necessary to de-duplicate client records within each system in order to provide an aggregate and unduplicated count of clients by project type.
- Be able to generate all reports required by federal partners, for example, the HUD-CoC APR and the HUD-ESG CAPER.
- Data fields that can be modified and customized by the victim service provider to benefit clients.

Additionally, individual survivor data must be routinely destroyed as soon as the program no longer needs it to provide client services or to satisfy grant/legal requirements. Victim service providers may suppress aggregate data on specific client characteristics if the characteristics would be personally identifying. Finally, the program's contract with the database vendor should include binding agreements to ensure security of and program control over client data.

A Comparable Database 101 document is available on our website at:

<https://www.oregon.gov/ohcs/Pages/best-practices-hmis.aspx>

(E) Reporting Requirements

Subgrantee agencies are required to submit quarterly program reports by the 20th of the month following the end of each quarter in accordance with OHCS Master Grant Agreement directives for content and format. Subgrantees are required to submit an annual report within the timeframe set by OHCS. At the discretion of OHCS, other reports may be required when deemed necessary to provide adequate program utilization and performance information. Subrecipient reporting to subgrantee must occur timely, so that subgrantees can meet the required deadline for reports to OHCS. Assistance with HMIS data entry, data quality and reporting may be found on our website at: <http://www.oregon.gov/ohcs/Pages/housing-assistance-providers-in-oregon.aspx>.

11. Records Requirements

(A) Records Access

Subgrantee agencies and their subrecipients are required to permit OHCS, the Oregon Secretary of State's Office, the federal government, and the duly authorized representatives of such entities access to, and the right to copy, all program client and fiscal records for such purposes as research, data collection, evaluations, monitoring, and auditing. At the sole discretion of OHCS, access to records shall include the removing of records from the subgrantee and subrecipient agency's office.

(B) Records Retention

Subgrantee and subrecipient agencies shall retain all program records pertinent to client services and expenditures incurred under HSP in a manner consistent with the requirements of state and federal law. This includes, but is not limited to, those requirements listed in Administrative Rule, Operations Manual and Special Schedules. Find these at the Oregon State Archives:

(<http://arcweb.sos.state.or.us/pages/recmgmt/sched/state.html>);

and State Agency General Records Retention Schedules, found at the Oregon State Archives:

(http://arcweb.sos.state.or.us/pages/rules/oars_100/oar_166/166_300.html).

Subgrantee and subrecipient agencies shall retain and keep accessible all such **fiscal and program records**, client records, digital and electronic records, books, documents, papers, plans, and writings for a minimum of **(6) six years**, or such longer period as may be required by applicable law, whichever date is later. Applicable law includes the following final payment and termination of HSP funding, or until the conclusion of any audit, controversy or litigation arising out of, or relating to, HSP.

12. Monitoring

OHCS will conduct a program monitoring of subgrantees once every three years or more frequently at OHCS' discretion. Fiscal monitoring will be conducted annually unless

circumstances require sooner. Subgrantees will be notified thirty (30) days in advance of the monitoring visit and informed of what documents and records will be reviewed and any required staff or Board interviews. OHCS will provide subgrantees with a written monitoring report inclusive of any findings, concerns or comments. Subgrantees are required to submit timely corrective action to findings and failure to do so may result in the withholding and/or return of HSP funds to OHCS.

Subgrantees must notify and receive approval from OHCS when adding subrecipients and/or renewing subrecipients. Notification and approval normally occurs during the Master Grant Agreement funding application process. However, if changes are made outside of the funding application, subgrantees must submit a Implementation Report Amendment Request form.

13. Subrecipient Monitoring

Subgrantees must monitor their subrecipient organizations at least once during a biennium or the term of the Master Grant Agreement, as determined by OHCS. Subrecipient organization monitoring procedures must be in place and adequately ensure compliance with HSP program requirements. Monitoring reports will be retained by the subgrantee and available for review by OHCS or other authorized entity.

All subrecipients must comply with all program rules and regulations as noted in this manual, the Master Grant Agreement, Program Element: Scope of Work.

Implementation Report.

14. Appendix 1: Applicable Rules and Regulations

All the following as may be amended from time to time:

1. TANF Rules and Regulations: See <https://www.acf.hhs.gov/ofa/programs/tanf/laws-regulations>.
2. Food Stamp Act: 7 USC §2020(e)(8), 7 CFR § 272.1(c); ORS 411.320 and 411.990; OAR 461-105-0010 through OAR 461-105-0140.
3. Temporary Assistance to Needy Families (TANF): 42 USC § 602(a)(1)(A)(iv); ORS 418.130 and 418.990; OAR 461-105-0010 through 461-105-0140.
4. Health Insurance Portability and Accountability Act of 1996, as amended: Public Law 104–191—Aug. 21, 1996
5. Medicaid: Medicaid Services under the Medicaid Act, Title XIX, 42 USC § 1396 et. seq; including § 1396a(a)(27); 42 CFR § 431.107(b)(1) & (2); 42 CFR Part 1002.3(a); 42 CFR Part 455 Subpart (B); 42 USC § 1396(a)(57) and (w); 42 CFR Part 431.107(b)(4); 42 CFR Part 489 Subpart I; Section 6032 of the Deficit Reduction Act of 2005, 42 USC § 1396a(a)(68).; ORS 411.320 and 411.990; OAR 461-105-0010 through 461-105-0140.
6. Income Eligibility Verification System (IEVS): 5.3.1.4.1 42 USC § 1320b-7, 20 CFR § 603; ORS 411.320, 411.990, ORS 418.130, 418.990; OAR 461-105-0010 through 461-105-0140.
7. Social Security Numbers: 5 USC § 552a, 42 USC §405 and § 408, and individual programmatic confidentiality provisions; ORS 411.320, 411.990, ORS 418.130, 418.990; OAR 461-105-0010 through 461-105-0140.
8. Tax Information: 26 USC § 6103, 26 USC § 7213(a) (2); ORS 314.835, ORS 314.840 and ORS 314.991.
9. Unemployment Insurance Information: ORS 657.670; ORS 411.320, 411.990, ORS 418.130, 418.990; OAR 461-105-0010 through 461-105-0140.
10. Alcohol and Drug Information: 42 USC § 290dd-2; 42 CFR § 2.1; ORS 411.320, 411.990, ORS 418.130, 418.990; OAR 461-105-0010 through 461-105-0140.
11. Mental Health Information: 42 USC § 6041, 42 USC § 10841(1) (H); ORS 179.505 and ORS 192.515 through ORS 192.525.
12. Child Abuse Information: ORS 419B.035.
13. Support Enforcement Information: 42 USC § 654(26), ORS 25.260 and 25.990; OAR 461-200-1140.
14. Criminal Background Check Information: ORS 181.536, 181.537 and ORS 181.540; OAR 461-165-0400.; OAR 407-007-0000 through 407-007-0640.
15. School Records: ORS 192.496(4) and ORS 326.565; OAR 581-021-0330 and OAR 581-021-0350.
16. Disclosure: 42 CFR Part 455.104 and 455.434.
17. Public Records In General: ORS 192.496 through 192.530.

18. Misuse of Confidential Information: ORS 162.425.
19. Refugee Program: 45 CFR 400.27, OAR 461-105-0010 through 461-105-0140.
20. Faith-Based Organizations: 45 CFR Part 87; Federal Register, July 16, 2004, Vol. 69, #136.
21. Federal Intellectual Property Rights Notice: 37 CFR Part 401
22. Federal Whistleblower Protection: 41 USC 4712, Pilot Program for Enhancement of Employee Whistleblower Protection; Attachment 4, "Information Required by 2 CFR Subtitle B and 2 CFR 200.331(a)(1)".
23. ORS 456.515 through 456.725: [Housing and Community Services Department](#)
24. ORS 458.505 through 458.545: [Community Services Program](#)
25. OAR 166-300: [State Agency General Records Retention Schedules](#)
26. OAR 813-051: [Housing Stabilization Program](#)
27. Inter-Agency Agreement between DHS and OHCS
28. **This manual** as guidelines for HSP, and all other references made within this manual.
29. HMIS Data Standards Manual: <https://www.hudexchange.info/resource/3824/hmis-data-dictionary/>
30. **CFRs** cited are amended from time to time and can be found at: <http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&tpl=%2Findex.tpl>
31. **ORS** cited are amended from time to time and can be found at: https://www.oregonlegislature.gov/bills_laws/Pages/ORS.aspx
32. **OARs** cited are amended from time to time and can be found at: <http://arcweb.sos.state.or.us/pages/rules/access/numerically.html>
33. The DHS Family Service Manual can be found at: http://www.dhs.state.or.us/policy/selfsufficiency/em_firstpage.htm
34. **Limited English Proficiency** federal interagency website can be found at: <http://www.lep.gov/> and guidance can be found at: <https://www.hud.gov/offices/fheo/promotingfh/FederalRegistepublishedguidance.pdf> and FAQs can be found at: https://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/promotingfh/lep-faq.

15. Appendix 2: Acronyms

Acronyms commonly used in this program are:

CFR	Code of Federal Regulations
DHS	Department of Human Services, Oregon
FPL	Federal Poverty Level
HMIS	Homeless Management Information System
HSP	Housing Stabilization Program
HUD	United States Department of Housing and Urban Development
MOE	Maintenance of Effort
OAR	Oregon Administrative Rule
OHCS	Oregon Housing and Community Services
ORS	Oregon Revised Statute
OSP	Oregon State Police
SNAP	Supplemental Nutrition Assistance Program (formerly food stamps)
SSI	Social Security Income
SSN	Social Security Number
TANF	Temporary Assistance for Needy Families

16. Appendix 3: Definitions

Barriers to Employment: include lack of childcare, education, transportation, or work experience, lack of a high school degree or GED (General Educational Development) Certificate, illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, or a history of unstable employment.

Caretaker Relative:

The Dependent Child must live with a Caretaker Relative:

Any blood relative of the dependent child's, stepfather, stepmother, stepbrother, stepsister or an individual who has legally adopted the dependent child..

Case Management Expense is inclusive of

- Intake and assessment, including time spent assessing a household, whether or not the household is determined eligible;
- Direct client services includes developing an individualized housing and service plan, monitoring and evaluating household progress, identifying creative and immediate housing solutions outside of the traditional homeless service system (diversion), and ensuring that households' right are protected;
- Services that increase access to the income supports of disability benefits programs administered by the Social Security Administration for eligible adults who are experiencing or at risk of homelessness and have a serious mental illness, medical impairment, and/or a co-occurring substance use disorder (i.e., SOAR or similar style services);
- Services for clients entering into or are in permanent supportive housing and need assistance to stabilize;
- Placement services includes services or activities designed to assist households in locating, obtaining, and retaining suitable housing, tenant counseling, assisting households to understand leases, inspections, securing utilities, making moving arrangements, and representative payee services concerning rent and utilities;
- Mediation and outreach to property owners/landlords related to locating or retaining housing;
- Outreach services;
- Connecting clients to resources;
- General liability insurance and automobile insurance;
- Training;
- Salary, benefits of staff performing case management services.

Dependent Child: *A dependent child must be one of the following:*

- (1) An individual who is living with the caretaker relative and is under the age of 18, **OR** is under 19 and a full-time student in high school or the equivalent level of vocational or technical training; **OR**
- (2) A minor parent whose parents have chosen to apply for benefits for the minor parent (this does not apply to a minor parent who is married and living with his or her spouse); **OR**
- (3) An unborn child (see client eligibility requirement for pregnancies)

Domestic Violence: This definition includes domestic violence, dating violence, sexual assault, stalking, attempting to cause, or intentionally, knowingly or recklessly causing or placing another in fear of imminent serious physical injury or emotional, mental or verbal abuse, and using coercive or controlling behavior. This does not include other criminal acts such as violence perpetrated by a stranger, neighbor, acquaintance or friend, unless those persons are family members, intimate partners or household members. (Note: This definitional aligns with TANF rules and regulations)

EPIC Outcomes Tool is a table listing a selection of performance measures and outcomes under each of the four headings of Ending Homelessness, Preventing Homelessness, Inclusion and Diversity; and Capacity of the Community. CAAs will have the opportunity to choose additional performance measures from this listing.

Essential Components of Service Delivery are included in the MGA Operational Standards. They are the use of Housing First, maximizing participation in Coordinated Entry, ensuring availability of Low-Barrier Shelters in the community, incorporating the Lived Experiences of Homelessness into program design and implements and ensuring service provision has components for Equity and Racial Justice.

HMIS: Means Homeless Management Information System. OHCS uses ServicePoint as their HMIS; however, for Domestic Violence Shelters use a comparable database (see “Data Entry” section of this manual).

Housing First is an approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment or service participation requirements.

Housing Instability: Means a household who meets at least one of the following conditions:

- (1) Has moved because of economic reasons (2) two or more times during the 60 days immediately preceding the application for assistance
- (2) Living in the home of another because of economic hardship on a short-term/temporary basis (provide the date that this housing will end)
- (3) Living in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals
- (4) Living in a Single Room Occupancy or efficiency apartment unit in which there resides more than (2) two persons
- (5) Is exiting a publicly funded institution or system of care
- (6) Is currently living in unsafe housing
- (7) Has some other condition which rises to the level of “housing instability” as described above

Marriage: Means the union of two individuals who are legally married. Legally married means a marriage uniting two individuals according to the provision of:

- (1) The statutes of the state where the marriage occurred;
- (2) The common law of the state in which the two individuals previously resided while meeting the requirements of common law marriage in that state; or

- (3) The laws of a country in which the two individuals previously resided while meeting the requirements for legal or cultural marriage in that country.

MGA Operational Standards are specific identified criteria used to set a foundation of administrative, fiscal and service delivery expectations for CAAs. The purpose of establishing the standards is to ensure that no matter where individuals and families enter the homeless system, Oregonians will be provided the same access to quality services.

Other Federal Statutes: Other Federal Statutes include:

- (1) Runaway and Homeless Youth Act (42 U.S.C. 5701 et seq.),
- (2) Head Start Act (42 U.S.C. 9831 et seq.),
- (3) Subtitle N of the Violence against Women Act of 1994 (42 U.S.C. 14043e et seq.) (VAWA),
- (4) Section 330 of the Public Health Service Act (42 U.S.C. 254b),
- (5) Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.),
- (6) Section 17 of the Child Nutrition Act of 1966 (42 U.S.C. 1786), and
- (7) Subtitle B of title VII of the McKinney-Vento Act (42 U.S.C. 11431 et seq.)

Parent: Means the biological mother or father of an unborn child or the biological, step, or adoptive mother or father of a child.

Priority Population means persons that the subgrantee/subrecipient, the funding source or OHCS has determined as having the greatest need and will receive services first (such as veterans and homeless families with children). Directives by the funding source or OHCS shall take precedence.

Rent arrearage is past due rent owed (and other rental-related expenses incurred such as filing fees, court fees or lease break fees required by prospective landlord) to a current, prospective or previous landlord. If arrears are owed to a previous landlord or to a collection agency, these arrears may be paid, but only when there is **documented evidence** that payment of the arrears is necessary for the participant to obtain permanent housing and maintain stability in that housing. Payment of arrears is restricted to a one-time payment for up to 6 month's past due rent. Subgrantees and subrecipients have the discretion to limit payments for rent arrearage.

Shelter: "Emergency shelter," means any facility whose purpose is to provide temporary shelter for the homeless including congregate shelters, hotels/motels paid for by charitable organizations, or federal, state and/or local government programs, which do not require occupants to sign leases or occupancy agreements.

Shelter Room and Board: A prorated cost of room and board (percentage of cost related to a HSP client), may be an allowable expense. While general administrative costs of a shelter are not allowable, costs directly attributable to a HSP client could be, such as lodging, utilities and food. Subgrantees and subrecipients must document how they calculate the expense attributable to a HSP client. HSP clients residing in shelters must continue to meet all HSP eligibility requirements and must be entered into ServicePoint and reported on the quarterly report

Spouse: Means an individual who is legally married to another individual.

Subgrantee Agency: Community Action Agencies (or other qualified entities) that receive funding from the Recipient (OHCS) and provides direct client services. Subgrantee agencies may contract direct client services to subrecipients.

Subrecipient: Subrecipients are entities that, by contract with the subgrantee agency, provide HSP direct client services and receive funding directly from the subgrantee agency. Through its agreements with subgrantee agency, subrecipients will comply with all requirements for the Housing Stabilization Program.

Support Network: Examples include family, friends and faith-based or other social networks.

Target Population: means persons a subgrantee/subrecipient wishes to reach out to who are under-represented in their service population (such as refugees, teen parents, SSI recipients).

Temporary Living: Residing in a facility for fewer than 90 days

Transportation Payments may include bus/train passes, fuel vouchers, vehicle insurance payments or vehicle repair. Payments that allow clients to use public transportation are the highest priority; however, case managers have the discretion to provide payments for private transportation. Case managers must document why private transportation options are preferred over public transportation options and that the expense will lead to the stabilization of housing. Car repairs for a vehicle not owned by an individual in the household are not allowed and client must have a valid driver's license. Gift cards may be used ONLY as a gas payment and the expense must have a receipt in the file. If there is no receipt of purchase using the gift card, the cost would not be allowed.

Unaccompanied Youth with Child/ren: A minor parent under the age of 18 or a teen parent under the age of 20 and has not completed a high school diploma or GED program.

If the Unaccompanied Youth with Child/ren is a Minor Parent (under the age of 18), to be eligible for benefits, the Minor Parent must live with his/her parent, legal guardian or another adult relative. If it is determined that it is in the best interest of the minor parent to live on their own, the minor parent must attend high school or its equivalent full-time or participate in the Department of Human Services JOBS or other training program to develop employment or self-sufficiency skills.

Operational Flexibility: Sexual abuse or other physical or emotional abuse is grounds to waive the requirement that a minor parent live with their parent(s), legal guardian or other adult relative in order to receive benefits. The decision to waive this requirement may also be based on the unavailability of the parent(s), legal guardian or other adult relative in providing the minor parent's care, control and supervision. This is true when they are not living in the same state, or when the minor parent has been living on his/her own for over 12 months before or since the birth of his/her last child.

If a Minor Parent returns to live with his/her parent, parents or legal guardian, consider the parent, parents, or legal guardian's income during application for benefits.

Utility arrearage assistance is past due utilities and can only be provided when there is documented evidence of a utility bill in the participant's name. Utility arrears assistance must result in utilities being turned on at the new permanent housing location. If arrears are owed to a previous utility company or to a collection agency, these arrears may be paid, but only when there is **documented evidence** that payment of the arrears is necessary for the participant to obtain utility service.

(End)

17. Appendix 4: MOE FAQs

1. What kinds of expenditures DO NOT count towards MOE:

- (1) Funds that originated with the Federal government;
- (2) State funds expended under the Medicaid program;
- (3) State funds from a prior fiscal year;
- (4) Any funds used as MOE for a previous HSP grant (not used again for MOE on a subsequent grant award).

2. What are some examples of Cash contributions that DO NOT count towards MOE:

- Low-Income Home Energy Assistance Program (LIHEAP)
- HOME Tenant Based Assistance (HTBA)
- Community Development Block Grant (CDBG)
- Community Services Block Grant (CSBG)
- Continuum of Care (CoC)
- Emergency Food and Shelter Program (EFSP)
- Supplemental Assistance for Facilities to Assist the Homeless Program (SAFAHP)
- Supplemental Nutrition Assistance Program (SNAP)
- Women Infants & Children nutrition program (WIC)
- US Housing & Urban Development Family Unification Voucher (HUDFUV)

3. What are some examples of Cash contributions that DO count towards MOE:

- Emergency Housing Assistance (EHA)
- Elderly Rental Assistance (ERA)
- State Homeless Assistance Program (SHAP)
- Private funds
- Foundation funds

- State funds (as qualified by #5 in this FAQ and not already counted by another source)
- Local government funds (as qualified by #5 in this FAQ and not already counted by another source)
- *IF YOU PLAN TO USE STATE OR LOCAL GOVERNMENT FUNDS, THESE FUNDS MUST NOT ALREADY BE COUNTED AS MOE BY ANOTHER SOURCE. PLEASE CONTACT THE SOURCE OF THESE FUNDS TO ENSURE THAT THEY ARE NOT ALREADY COUNTED AS MOE.*

4. What are some examples of In-Kind contributions that DO count towards MOE (funds not already counted by other sources, such as Oregon Food Bank, and with prior approval – see Section 4 of this manual):

- Volunteer driver hours
- Volunteer food pantry hours
- Other volunteer worker hours

5. What kinds of State expenditures count toward meeting a State's basic MOE expenditure requirement?

- (a) Expenditures of State funds in TANF MOE may count if they are made for the following types of benefits or services:
- (1) Cash assistance, including the State's share of the assigned child support collection that is distributed to the family, and disregarded in determining eligibility for, and amount of the TANF assistance payment;
 - (2) Child care assistance (see §263.3);
 - (3) Education activities designed to increase self-sufficiency, job training, and work (see §263.4);
 - (4) Any other use of funds allowable under section 404(a)(1) of the Act including:
 - (i) Nonmedical treatment services for alcohol and drug abuse and some medical treatment services (provided that the State has not commingled its MOE funds with Federal TANF funds to pay for the services), if consistent with the goals at §260.20 of this chapter [these services are not allowable with HSP]; and
 - (ii) Pro-family healthy marriage and responsible fatherhood activities enumerated in part IV-A of the Act, sections 403(a)(2)(A)(iii) and 403(a)(2)(C)(ii) that are consistent with the goals at §§260.20(c) or (d) of this chapter, but do not constitute “assistance” as defined in §260.31(a) of this chapter; and
- (5)(i) Administrative costs for activities listed in paragraphs (a)(1) through (a)(4) of this section, not to exceed 15 percent of the total amount of countable expenditures for the fiscal year.
- (ii) Costs for information technology and computerization needed for tracking or monitoring required by or under part IV-A of the Act do not count towards the limit in paragraph (5)(i) of this section, even if they fall within the definition of “administrative costs.”
 - (A) This exclusion covers the costs for salaries and benefits of staff who develop, maintain, support, or operate the portions of information technology or computer systems used for tracking and monitoring.
 - (B) It also covers the costs of contracts for the development, maintenance, support, or operation of those portions of information technology or computer systems used for tracking or monitoring.
- (b) With the exception of paragraph (a)(4)(ii) of this section, the benefits or services listed under paragraph (a) of this section count only if they have been provided to or on behalf of eligible families. An “eligible family” as defined by the State, must:

- (1) Be comprised of citizens or non-citizens who:
 - (i) Are eligible for TANF assistance;
 - (ii) Would be eligible for TANF assistance, but for the time limit on the receipt of federally funded assistance; or
 - (iii) Are lawfully present in the United States and would be eligible for assistance, but for the application of title IV of PRWORA;
 - (2) Include a child living with a custodial parent or other adult caretaker relative (or consist of a pregnant individual); and
 - (3) Be financially eligible according to the appropriate income and resource (when applicable) standards established by the State and contained in its TANF plan.
- (c) Benefits or services listed under paragraph (a) of this section provided to a family that meets the criteria under paragraphs (b)(1) through (b)(3) of this section, but who became ineligible solely due to the time limitation given under §264.1 of this chapter, may also count.
- (d) Expenditures for the benefits or services listed under paragraph (a) of this section count whether or not the benefit or service meets the definition of assistance under §260.31 of this chapter. Further, families that meet the criteria in paragraphs (b)(2) and (b)(3) of this section are considered to be eligible for TANF assistance for the purposes of paragraph (b)(1)(i) of this section.
- (e) Expenditures for benefits or services listed under paragraph (a) of this section may include allowable costs borne by others in the State (e.g., local government), including cash donations from non-Federal third parties (e.g., a non-profit organization) and the value of third party in-kind contributions if:
- (1) The expenditure is verifiable and meets all applicable requirements in 45 CFR 92.3 and 92.24;
 - (2) There is an agreement between the State and the other party allowing the State to count the expenditure toward its MOE requirement; and,
 - (3) The State counts a cash donation only when it is actually spent.
- (f)(1) The expenditures for benefits or services in State-funded programs listed under paragraph (a) of this section count only if they also meet the requirements of §263.5.
- (2) Expenditures that fall within the prohibitions in §263.6 do not count.
- (g) State funds used to meet the Healthy Marriage Promotion and Responsible Fatherhood Grant match requirement may count to meet the MOE requirement in §263.1, provided the expenditure also meets all the other MOE requirements in this subpart.

6. When do child care expenditures count?

- (a) State funds expended to meet the requirements of the CCDF Matching Fund (i.e., as match or MOE amounts) may also count as basic MOE expenditures up to the State's child care MOE amount that must be expended to qualify for CCDF matching funds.
- (b) Child care expenditures that have not been used to meet the requirements of the CCDF Matching Fund (i.e., as match or MOE amounts), or any other Federal childcare program, may also count as basic MOE expenditures. The limit described in paragraph (a) of this section does not apply.
- (c) The child care expenditures described in paragraphs (a) and (b) of this section must be made to, or on behalf of, eligible families, as defined in §263.2(b).

7. When do educational expenditures count?

- (a) Expenditures for educational activities or services count if:
 - (1) They are provided to eligible families (as defined in §63.2(b)) to increase self-sufficiency, job training, and work; and
 - (2) They are not generally available to other residents of the State without cost and without regard to their income.
- (b) Expenditures on behalf of eligible families for educational services or activities provided through the public education system do not count unless they meet the requirements under paragraph (a) of this section.

18. HSP CASE ALLOCATION FORM

Client Name: _____

(You are required to have SS# on file of at least the family member meeting eligibility requirements)

Original Amended Plan – Date: _____ Projected Exit Date: _____

	Dollar Amount per Month	Number of Months	Month Assisted / NOTES	Total Amount Requested
A) Rent/Mortgage or Repairs	\$			\$
B) Fees	\$			\$
C) Security Deposit(s)	\$			\$
D) Moving Expenses	\$			\$
E) Total (A-D) Housing Assistance				\$
F) Employment Related	\$			\$
G) Transportation Related	\$			\$
H) Education Related	\$			\$
I) Total (F-H) Auxiliary				\$
J) Total Case Management	\$			\$
Total (E+I+J) Amount of Assistance				\$

Total HSP			\$
Total MOE and list sources	Sources:		\$

Case Manager Approval: _____ Date: _____