

CITY OF EL PASO

Homeless, Housing and Services Program (HHSP)

HHSP POLICIES + PROCEDURES



Effective September 1, 2024
Updated January 16, 2024

Table of Contents

| | |
|-------------------------------------------------------------|----|
| EXECUTIVE SUMMARY | 4 |
| ACRONYMS + DEFINITIONS..... | 4 |
| Acronyms | 4 |
| Definitions..... | 4 |
| DEPARTMENT OF COMMUNITY + HUMAN DEVELOPMENT | 5 |
| HHSP OVERVIEW | 5 |
| FEDERAL, STATE + LOCAL REQUIREMENTS | 6 |
| LOCAL REQUIREMENTS | 8 |
| PERFORMANCE OUTCOMES..... | 10 |
| PROGRAM APPLICANTS | 11 |
| TENTATIVE SCHEDULE..... | 11 |
| PROGRAM REVIEW + SCORING PROCESS | 11 |
| DCHD STAFF REVIEW..... | 11 |
| AGENCY CREDIT SCORE | 12 |
| CDBG PUBLIC SERVICES, HOPWA + ESG APPLICATION PROCESS | 12 |
| APPEALS PROCESS..... | 14 |
| EXIT CONFERENCE..... | 14 |
| CITY COUNCIL | 14 |
| IMPLEMENTATION REQUIREMENTS..... | 14 |
| ELIGIBLE COSTS..... | 14 |
| • General | 14 |
| • Youth Set-Aside..... | 15 |
| PROGRAM PARTICIPANT ELIGIBILITY + RECORDKEEPING | 16 |
| OTHER IMPLEMENTATION REQUIREMENTS | 16 |
| PROGRAM PERFORMANCE..... | 16 |

Assurances and Attachments to be included with application submission.

Assurances

Acceptance of Grant Conditions and Terms

Assurance of Applicant Eligibility for Non-Profit Organizations Assurance C –

Assurance of Compliance with Ordinance No. 9779 Assurance D –

Accessibility / Letter of Assurance with Self-Evaluation

Attachments

General Completeness Checklist Attachment B –

Community Performance Benchmarks Attachment C –

HMIS Participation Standards Attachment D – Faith

Based Organizations Guidelines Attachment E – HHSP

Outcome Statement Worksheet Attachment F – HHSP

Budget + Performance Workbook Attachment G –

HHSP Narrative Questions Attachment H – HHSP

Scorecard

NOTE: Attachments are available on DCHD Webpage.

EXECUTIVE SUMMARY

The purpose of this document is to notify interested parties of the availability of Homeless, Housing and Services Program (HHSP) funds for services and programs within the City of El Paso for the upcoming Program Year. Additionally, it contains the policies and procedures pertaining to implementation of funds projected to be received by the City of El Paso from the Texas Department of Housing and Community Affairs (TDHCA). The Department of Community and Human Development (DCHD) oversees the planning, implementation and compliance of these funds on behalf of the City of El Paso.

| Category |
|-----------------|
| General |
| Youth Set-Aside |

The City of El Paso strategic objective is to “develop solutions to increase access and services for El Pasoans experiencing or at-risk of homelessness. “Applicants should confirm eligibility with governmental requirements and illustrate alignment with identified city strategic goals. The City Strategic Plan can be found at elpasotexas.gov/government/strategic-planning.

ACRONYMS + DEFINITIONS

Acronyms

- **ADA** – Americans with Disabilities Act
- **CoC** – Continuum of Care
- **DCHD** – Department of Community and Human Development
- **FY** – Fiscal Year
- **HHSP** – Homeless Housing and Services Program
- **HMIS** – Homeless Management Information System
- **NOFA** – Notice of Funding Availability
- **PY** – Program Year
- **TARP** – Technical Advisory Review Panel
- **TDHCA** - Texas Department of Housing and Community Affairs

Definitions

- **Government entity** – any branch, department, agency, or instrumentality of state government, or any official or other person acting under color of state law (e.g., school districts, public housing authority).
- **Recipient** – the City of El Paso DCHD who receives funds directly from TDHCA through an executed grant agreement.
- **Sub-recipient agency** – an agency that receives funding from the Recipient (DCHD) and provides

direct client services.

DEPARTMENT OF COMMUNITY + HUMAN DEVELOPMENT

The Department of Community + Human Development (DCHD) of the City of El Paso acts as the grantee for funding received from the Texas Department of Housing and Community Affairs. The role of DCHD staff is to administer the specific allocation of funding to sub-recipients as well as to execute and oversee compliance with federal and state regulations and the policies and procedures included in this document. Funding allocations are projections only and can be modified at the discretion of the Director of DCHD, provided that such modifications do not represent a significant change in allocation priorities and/or method of distribution. Additionally, the Director of DCHD may grant exceptions to policies and procedures contained within this document provided that those exceptions do not violate federal or state regulations and are made for each program year before the presentation of the HHSP Funding Recommendation to the City Council.

In order to have a greater impact on services to our community, services will be transitioning to a 2-year funding cycle. This funding cycle will cover funding for programs for Fiscal Year (FY) 25 and will renew funding for FY 26, contingent on the performance of the program. At the end of FY 25, spending rate and performance outcomes will be re-evaluated to determine continued funding for FY 26. DCHD may decide to discontinue funding for any program not meeting objectives after the first year, including maintaining a healthy spent rate.

HHSP OVERVIEW

In accordance with Tex. Government Code §2306.2585, HHSP provides funding to municipalities with populations of 285,500 or greater to develop programs to prevent and eliminate homelessness. The City of El Paso is projected to receive HHSP funds under General and Youth Set-Aside Components.

HHSP OBJECTIVES

General. The local objectives for HHSP General funding are to:

1. Prevent at-risk families and individuals from becoming homeless;
2. Rapidly re-house individuals and families who are experiencing homelessness;
3. Provide case management to ensure successful outcomes.

Youth Set-Aside. The local objectives for HHSP Youth Set Aside funding are to:

1. Provide case management to eligible youth (ages 18 to 24) in transitional housing;
2. Provide transitional housing for youth (ages 18 to 24) and youth who have aged out of foster care;
3. Provide essential services to youth (ages 18 to 24) in transitional housing.

FEDERAL, STATE + LOCAL REQUIREMENTS

Organizations who apply for funding must meet all applicable federal, state and local eligibility requirements. Federal requirements are determined by HUD. Local guidelines are developed by DCHD staff and approved by City Council.

FEDERAL + STATE REQUIREMENTS

- **ADA and Historic Preservation.** Applicant must comply with all City Codes, including City, State and Federal Americans with Disabilities Act (ADA) and historic preservation requirements.
- **Authority to Apply.** Written minute action and/or Board approval documentation signed by the Board President authorizing submittal and signature of the application by Board President (or other authorized representative) must be submitted with the application.
- **Authorized Signatory.** Approved documentation (e.g., minute action or letter from the Board) certifying whom from the applicant's organization is the authorized signatory who can sign contracts on behalf of the agency.
- **Unique Entity ID.** Applicant is required to submit their Unique Entity ID and System of Award Management (SAM) record status in order for DCHD staff to verify through the SAM website that the agency is clear of debarment from receiving federal funds prior to review application. If considered for funding, DCHD staff will recertify compliance with this requirement prior to execution of any contract. The Unique Entity ID is a 12-character alphanumeric ID assigned to an entity by SAM.gov. New entities can get their Unique Entity ID at SAM.gov and, if required, complete an entity registration.
- **Fair Housing Act.** Applicant must comply with the Fair Housing Act, Executive Order 11063 (Equal Opportunity in Housing), the Civil Rights Act of 1964, the Age Discrimination Act of 1975, and Executive Order 11246 (Equal Employment Opportunity). Agencies operating programs/services in DCHD-funded facilities, as applicable, will be required to develop and implement Affirmative Marketing policies and procedures, and shall assure housing shall be made available without regard to actual or perceived sexual orientation, gender identity, or marital status.
- **Faith-Based Organizations.** Faith-based organizations that are applying for funding must comply with HUD's Final Rule that became effective October 30, 2003, as amended. Refer to Attachment J of this document.
- **Households Served.** Applicants are required to provide the number of households served for each program or project that is awarded funding. Data collection on race, ethnicity, and age will be used to facilitate analysis of racial disparities among people experiencing homelessness. Such an analysis is a critical first step in identifying and changing racial and ethnic bias in our systems and services.
- **Lobbying** - Under section 1352, title 31, U.S. Code, no Federal appropriated funds may be paid or

have been paid, by or on behalf of the applicant, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with Federal contract, grant, loan, or cooperative agreement, the applicant must complete and submit Standard Form-ILL, "Disclosure Form to Report Lobbying".

- **Persons Served.** Applicants are required to provide the number of persons served for each program or project that is awarded funding. Data collection on race, ethnicity, and age will be used to facilitate analysis of racial disparities among people experiencing homelessness. Such an analysis is a critical first step in identifying and changing racial and ethnic bias in our systems and services.
- **Procurement Guidelines.** Applicants must follow federal procurement rules, along with all applicable state and local requirements, when purchasing services, supplies, materials, or equipment with DCHD-awarded funding.

Below is a summary of the most current federal procurement methods. Applicable federal regulations are contained in 2 CFR Part §200.320 Uniform Administrative Requirements.

- **Sealed bids (formal advertising).** This procedure should be used for all construction contracts or for goods costing more than \$100,000. Competitive sealed bidding requires publicly solicited sealed bids and a firm- fixed-price lump sum or unit price contract is awarded to the responsible bidder whose bid, conforming to all the material terms and conditions of the invitation for bids, is lowest in price. The following requirements apply when this method of procurement is used:
 - **Publication Period:** The invitation for bids must be publicly advertised and bids solicited from an adequate number of suppliers. The publication should be published at least once in a newspaper of general circulation, providing sufficient time prior to bid opening. If the publication period is not of sufficient time to attract adequate competition, the bid may have to be re-advertised.
 - **Clear Definition:** The invitation for bids, including specifications and pertinent attachments, must clearly define the items or services needed in order for bidders to properly respond to the invitation.
 - **Public Opening:** All bids must be opened publicly at the time and place stated in the invitation for bids. The public is allowed at that time to review the bids.
 - **Selection and Contracting:** A firm-fixed-price contract award must be made by written notice to the responsible bidder whose bid, conforming to the invitation for bids, is lowest.

Where specified in the bidding documents, factors such as discounts, transportation costs and life cycle costs must be considered in determining which bid is lowest.

- **Rejection of all Bids:** All bids may be rejected when sound documented reasons exist. Such documentation shall be made a part of the files.
- adequate number of qualified sources.
- **Competitive proposals.** This procedure is used to purchase professional services where the total cost will exceed \$100,000. Under this procurement method, the applicant must publish a written request for submissions and then review these submissions based on established selection criteria; and the applicant must solicit proposals from an adequate number of qualified sources. There are two possible methods of soliciting proposals – a request for proposals (RFP) or a request for qualifications (RFQ). The following requirements apply when this method of procurement is used:
 - **Publication Period:** Proposals must be solicited from an adequate number of qualified sources and an advertisement must be published. RFPs/RFQs should be published in a sufficient timeframe before the proposals/qualifications are due.
 - **Clear Definition:** The RFP/RFQ must identify the general scope of work and all significant factors of evaluation, including price where appropriate, and their relative importance.
 - **Technical Evaluation:** The grantee must provide a mechanism for technical evaluation of the proposals received, determinations of responsible offeror and the selection for contract award.
 - **Award:** Award may be made to the responsible offeror whose proposal will be most advantageous to the procuring party, price and other factors considered. Unsuccessful offerors should be notified promptly. The contract can be either a fixed price or a cost reimbursement type.
- **Verification of non-profit status.** Non-profit agencies must submit the Internal Revenue Service (IRS) letter certifying their 501(c) (3) status and the completed and signed Assurance of Applicant Eligibility for Non-Profit Organizations on page. Refer to Assurance B of this document.

LOCAL REQUIREMENTS

- **Acceptance of Grant Conditions and Terms.** Applicant must submit with their application an Acceptance of Grant Conditions and Terms form signed by an authorized representative of the applicant. Refer to Assurance A of this document.
- **Administrative Capacity.** Applicant must have demonstrated administrative and financial capacity to fully operate the project. A certified audit, covering a period within the last 18-24 months must be submitted. This requirement may be waived for organizations or entities that expend less than \$750,000 in federal funds for the audited year. Awarded allocation of funds is distributed on a

reimbursement basis. All agencies except City Departments that are receiving funds must demonstrate the financial capacity to pay any project-related costs, including design, construction, and/or operating, for a period of at least three months prior to reimbursement.

- **Completeness Check.** Applications and supporting documentation must be turned in by the respective deadline to be considered for funding. All required supporting documentation must be attached to the application in order for it to be considered complete.
- **Compliance with Existing Contracts.** Applicants who are currently receiving HHSP funds and applying for additional funds must comply with all terms of their contracts, must not have any outstanding audit findings or monitoring findings as determined by the City or TDHCA, and must remain in good standing throughout the entire program year.
- **Conflict of Interest.** Applicant must divulge if any member of their board is a City employee so a determination may be made if a conflict exists. Conflict of Interest and all other provisions extend to partners and subcontractors as well.
- **HMIS Participation.** Applicants whose services, programs and/or facilities will house or primarily serve the homeless population must fully participate as an entity in the Homeless Management Information System (HMIS) for the full term of the established agreement. “Full participation as an entity” requires that all applicable services, programs and/or facilities operated and/or provided by the entity, regardless of funding source, be compliant with the Standards for Participation of the HMIS Lead Entity. The City will consult with the HMIS Lead Entity to determine compliance with this requirement. In accordance with §10 TAC 7.6, Subrecipient must ensure that data on all persons served and all activities assisted under Homeless Programs is entered into the applicable HMIS, or HMIS-comparable database for domestic violence or legal service providers.
- **Jurisdiction.** All programs, clients, and/or improvements must be located within the city limits of El Paso, Texas for programs funded by HHSP.
- **Ordinance 9779.** All facilities receiving funding from the City must comply with Ordinance 9779, Non-Non-Discrimination Against Persons with Disabilities. This means that the facility must be accessible for use by persons with disabilities in terms of employment and service, or have an approved transition plan, before the funding can be approved. As part of this requirement, applicants must submit the completed and signed Assurance of Compliance with Ordinance No. 9779, Accessibility/Letter of Assurance, and submit the completed Guidelines/Self-Evaluation for Community Development and City of El Paso Sub recipients. Refer to Assurance C and Assurance D of this document.
 - The following requirements/allowances pertain to service categories only:
 - Applicant is required to submit Assurance C, Assurance D, and the Guidelines/Self-Evaluation.
 - For projects with multiple service locations, an Accessibility/Letter of Assurance must be provided for each site.
- **Timeliness Test.** In order to comply with expenditure requirements enforced by the Texas Department of Housing and Community Affairs (TDHCA), all program year projects should be substantially completed by the end of the program year as stated under Executive Summary of

this document.

- **Site Suitability.** Applicant must provide a Zoning Verification Letter provided by City of El Paso's Planning and Inspections Department (915) 212-0104, certifying the appropriateness of the zoning for the proposed project. Projects without the appropriate zoning at the time of application submission will be ineligible for funding.

A Zoning Verification Letter obtained within five (5) years from the start of the upcoming program year may be submitted with a cover letter signed by the Board Chair or Agency Director certifying that there have been no substantial changes in the program activities or the physical structure since the compliance letter was obtained.

- The following zoning requirements/allowances pertain to service categories only:
 - For projects with multiple service locations, a single letter reflecting all addresses or a letter for each location will be accepted.
 - If the activities are not currently in compliance, the applicant may submit a written workout plan in lieu of the letter. If the applicant is in the process of working out zoning compliance issues, the application will be allowed to advance. However, full compliance must be achieved and a letter of compliance from the City of El Paso's Planning and Inspections Department must be submitted prior to the City Council public hearing introducing the Draft Annual Action Plan.
 - Projects that have moved physical locations must obtain a zoning compliance letter for the new locations.
 - Projects located in Public Schools or City Parks Department facilities are not required to submit zoning letters.

PERFORMANCE OUTCOMES

DCHD has implemented a performance measurement system to gauge the success of awarded projects. Applicants are required to address in their applications the outcome(s)/benefit(s) that will result from the project after completion. Applicants are required to submit a statement explaining the expected outcome(s) of their projects. Outcomes describe the impact that will result from the project, and are the benefits to individuals, families, organizations and communities derived from construction of the project or participation in a program or service.

PROGRAM APPLICANTS

General. Eligible applicants are agencies currently administering Homelessness Prevention and/or Rapid Rehousing Assistance programs and are able to provide case management as part of their programs.

Youth Set-Aside. Eligible applicants are agencies currently administering youth homelessness programs for transitional housing of unaccompanied homeless youth and homeless young adults between the ages of 18 and 24. Eligible applicants must provide case management and/or essential services as part of transitional housing to homeless youth.

TENTATIVE SCHEDULE

DCHD will release (on an annual basis) a Tentative Schedule for Upcoming Program Year, which will indicate the tentative dates for the key events that will take place as part of the upcoming program year's planning process. This schedule will include dates for items such as the following:

- Application deadlines
- Public hearings
- City Council meetings

Note that dates stated in the Tentative Schedule for Upcoming Program Year are subject to change. Applicants should contact DCHD staff before application deadlines or other significant dates for

PROGRAM REVIEW + SCORING PROCESS

DCHD STAFF REVIEW

Reviewers will include DCHD staff members and may include an outside subject matter expert. All reviewers will be required to sign a Conflict of Interest Disclosure affidavit. Upon review of the affidavit, DCHD staff leadership will determine if a conflict of interest exists.

DCHD staff will determine the eligibility of each application. This review will include but is not limited to:

- Past agency performance
- Proper completion of the application
- Community impact and community need
- Program eligibility according to federal regulations

DCHD staff members will score each proposal using the scorecard attached to the application. The highest scoring applications will be selected for funding recommendation. The number of subrecipients awarded HHSP funds is dependent on both available funds and community impact.

AGENCY CREDIT SCORE

The Agency Credit Score consists of a 500-point scale. DCHD staff will consider the following when determining the Agency Credit Score:

- timeliness, completeness, and accuracy of programmatic and fiscal reporting to include reimbursement requests;
- Responsiveness of the agency to requests from DCHD;
- Agency ability to fulfill prior projects under the original, approved budget without excessive budget amendments or revisions;
- Compliance concerns and findings, and overall agency risk as assessed by DCHD;
- Agency history in meeting outcomes, units of service, persons, and households served, and successful deployment of matching funds if applicable.
- Agency history of timely expenditure of funds;
- Agency history of timely execution of contracts and implementation thereof without need for excessive contract amendments.

CDBG PUBLIC SERVICES, HOPWA + ESG APPLICATION PROCESS

The full application packets, including all required modules, will be provided at the mandatory training workshops only to those agencies who attend. (Virtual attendance may be authorized at the discretion of DCHD. **The City of El Paso has a fiscal responsibility to ensure that sub-recipients selected for funding abide by all rules and regulations established by the Federal government and that they are in compliance for the entirety of their funding cycles, as this will have a direct effect on the total Federal funds received by the City.**

Funding recommendations are established as follows:)

Step 1: DCHD receives application submissions. Upon receipt of applications, DCHD staff will determine the eligibility of each application.

Step 2: TARPs will be established to review and evaluate applications. The TARP will review and score the applications and an average Preliminary Application Score is established per program application.

For categories in which only one application is received, a DCHD staff member will review the sole application for completeness, eligibility, and quality of outcomes.

Step 3: DCHD determines the Agency Credit Score based on past funding years six years for the compliance monitoring section and the three most current funding years for all other sections of the credit score evaluation). Agency Credit Scores are a comprehensive assessment of past funding years that incorporate all programs funded under the same agency. While each program is evaluated separately, the Agency Credit Score is averaged

to provide a total score for the agency. If the applying agency has not been funded in the past 6 years, this score is not utilized.

Step 4: Both the Preliminary Score and the Agency Credit Score are utilized to determine a Final Preliminary Score.

The use of Agency Credit Score will be utilized to determine a Final Preliminary Application Score. The Agency Credit Score may result in the deduction of points using the scale below.

| <u>Evaluation Scale</u> | |
|----------------------------------------------|---------------------------------|
| 500: Maximum Total Score. | |
| This tool will not be used for new agencies. | |
| Credit Score | Score Card Deduction (-) points |
| 450-500 | 0 |
| 400-449 | 10 |
| 350-399 | 15 |
| 300-349 | 20 |
| 250-299 | 25 |
| 200-249 | 30 |
| 150-199 | 40 |
| 0-49 | 50 |

The TARP members' scores will ~~then~~ be averaged, and the applicants will be notified in memo form of their Final Preliminary Score. All applicants with a score of 75% or higher will have the opportunity to present an oral presentation to the TARP.

If an agency would like to appeal their score at this point in the process, they must do so within ~~3~~seven (7) calendar days of receiving their Final Preliminary Score. The written appeal must detail the decision, or determination that is being disputed. After seven (7) days, decisions and determinations can no longer be appealed.

Following the oral presentations, Final Scores will be developed as follows:

- The TARP will discuss each proposal. TARP members will have the opportunity to revise their Preliminary Scores for each proposal based on the TARP discussion.
- Should any TARP member revise their scoring, the scores of all TARP members will be averaged to create the applicant’s final score, which will be used as a platform for the DCHD funding recommendation.

Step 5: DCHD staff and leadership deliberates final ranks and establishes a funding recommendation to present to City Council. each).

- Applicants will be notified by email of the final funding recommendation. Full details of the applicant’s final score will be made available upon request once all recommendation letters are delivered.
- Program recommendations will be presented to the City Council, which has the ultimate authority on

project selection.

Please note that Agency Credit Scores are an average of all previously funded programs under one agency. An agency will be considered a single entity based on the following: Unique Entity ID, Employer Identification Number, organizational leadership, organizational board members, LLC name.

APPEALS PROCESS

Applicants may submit an **appeal in writing** to DCHD within seven (7) days of receiving notice that their application is not advancing to the next phase of the planning process. Appeals must be grounded on objective-based questions or requirements that pertain to the project evaluation forms.

After receiving an appeal request, DCHD staff will schedule, in a timely manner, a meeting with the applicant to discuss the appeal. If DCHD staff determines that the appeal is valid, corrective action will be made to the project evaluation form(s). If DCHD staff concludes that the appeal is invalid, an applicant can dispute this claim with the DCHD Director who will review the validity of the appeal request.

EXIT CONFERENCE

An exit conference will be provided, upon request, to those agencies whose projects are not funded following the final City Council Budget Hearing. The purposes of this conference will be capacity-building and to discuss alternative resources and approaches.

CITY COUNCIL

City Council retains the ultimate authority regarding funding for projects and programs indicated in this document. Recommendations initiated by DCHD Staff are presented in draft form to City Council in a document known as the **HHSP Projected Funding Recommendation**.

IMPLEMENTATION REQUIREMENTS

ELIGIBLE COSTS

- **General**
 - Case management costs include staff salaries related to assessing, arranging, coordinating and monitoring the delivery of services related to finding or maintaining housing. Costs include, but are not limited to, household eligibility determination, counseling, coordinating services and obtaining mainstream benefits for Program Participants, monitoring Program Participant progress, providing safety planning for persons under VAWA, developing a housing and service plan, and entry into HMIS or an HMIS-comparable database.
 - Essential services costs are associated with finding and maintaining stable housing, and include, but are not limited to, costs for:

1. Out-patient medical services;
 2. Child care;
 3. Education services;
 4. Legal services;
 5. Mental health services;
 6. Local transportation assistance;
 7. Drug and alcohol rehabilitation; and
 8. Job training
- Homelessness prevention and homelessness assistance costs that are associated with housing relocation, stabilization and assistance costs.
 1. Staff time entering information into HMIS or HMIS-comparable database related to homelessness prevention and homeless assistance is also an eligible cost.
 2. Homelessness prevention and homelessness assistance costs include, but are not limited to:
 - a. Hotel or motel costs;
 - b. Transitional housing;
 - c. Rental and utility assistance;
 - d. Rental arrears;
 - e. Utility reconnection fees;
 - f. Reasonable and customary security and utility deposits; and
 - g. Moving costs.

- **Youth Set-Aside**

Transitional living activities for youth-headed households are designed to provide short-term housing in conjunction with appropriate supportive services designed to foster self-sufficiency.

- Case management costs include staff salaries related to assessing, arranging, coordinating and monitoring the delivery of services related to finding or maintaining housing. Costs include, but are not limited to, household eligibility determination, counseling, coordinating services and obtaining mainstream benefits for Program Participants, monitoring Program Participant progress, providing safety planning for persons under VAWA, developing a housing and service plan, and entry into HMIS or an HMIS-comparable database.
- Operation costs include rent, utilities, supplies and equipment purchases, food pantry supplies, and other related costs necessary to operate an emergency shelter serving individuals experiencing
- Homelessness assistance costs are those associated with housing relocation, stabilization and assistance.
 1. Staff time entering information into HMIS or HMIS-comparable database related to

homelessness prevention and homelessness assistance is also an eligible cost.

2. Homelessness assistance costs include, but are not limited to:

- a. Hotel or motel costs;
- b. Transitional housing;
- c. Rental and utility assistance;
- d. Rental arrears;
- e. Utility reconnection fees;
- f. Reasonable and customary security and utility deposits; and
- g. Moving costs.

PROGRAM PARTICIPANT ELIGIBILITY + RECORDKEEPING

Per the Texas Regulation 3762 §7.28, the following requirements pertain to program participant eligibility and recordkeeping:

- A. A Program Participant must satisfy the eligibility requirements by meeting the appropriate definition of “homeless” or “at-risk of homelessness” in this Chapter, relating to Homelessness Programs, including but not limited to applicable income requirements.
- B. A Program Participant who is homeless qualifies for emergency shelter, Transitional Living Activities, case management, essential services, and homeless assistance.
- C. A Program Participant who is at-risk of homelessness qualifies for case management, essential services, and homeless prevention.
- D. The Subrecipient shall establish income limits that do not exceed the moderate-income level pursuant to Tex. Gov't Code §2306.152 in its written policies and procedures, and may adopt the income limit calculation method and procedures in TDHCA Handbook 4350 to satisfy this requirement.
- E. **Recertification.** Recertification is required for Program Participants receiving homelessness prevention and homelessness assistance within 12 months of the assistance start date. Subrecipient's written policies may require more frequent recertification. At a minimum, recertification requires that Program Participants receiving homelessness prevention or homelessness assistance:
 1. Meet the income eligibility requirements as established by the Subrecipient, if such limits are implemented in the Subrecipient's policies and procedures and required to be reviewed at Recertification; and
 2. Lack sufficient resources and support networks necessary to retain housing without assistance.
- F. **Break in Service.** The Subrecipient must document eligibility before providing services after a break in service. A break in service occurs when a previously assisted household has exited the program and is no longer receiving HHSP-funded services. Upon reentry into HHSP, the Household is required to complete a new intake application and provide updated source documentation, if applicable.

G. **Program Participant Files.** Subrecipient or their Subgrantees shall maintain Program Participant files for non-emergency activities providing direct subsidy to or on behalf of a Program Participant that contain the following:

1. An Intake Application, including the signature or legally identifying mark of all adult Household members certifying the validity of information provided, an area to identify the staff person completing the intake application, and the language as required by Tex. Gov't Code §434.212;
2. Certification from the Applicant that they meet the definition of "homeless" or "at-risk of homelessness." The certification must include the Program Participant's signature or legally identifying mark;
3. Documentation of income eligibility, if applicable, which may include a Declaration of Income Statement if documentation is unobtainable;
4. Documentation of annual recertification, as applicable, including income eligibility determination and verification that the Program Participant lacks sufficient resources and supports networks necessary to retain housing without assistance;
5. Documentation of determination of ineligibility for assistance when assistance is denied. Documentation must include the reason for the determination of ineligibility;
6. Copies of all leases and rental assistance agreements for the provision of rental assistance, documentation of payments made to owners for the provision of rental assistance, and supporting documentation for these payments, including dates of occupancy by Program Participants;
7. Documentation of the monthly allowance for utilities used to determine compliance with the rent restriction; and
8. Documentation that the dwelling unit for Program Participants receiving rental assistance complies with the Housing Standards in this Chapter, relating to Homelessness Programs.

OTHER IMPLEMENTATION REQUIREMENTS

- **Administrative Capacity.** HHSP funds are distributed on a reimbursement basis. All agencies receiving funds must demonstrate administrative and financial capacity to fully operate the proposed project for a period of at least three months prior to reimbursement.
- **Written Standards.** Applicants must certify that they have written standards that comply with the HHSP requirements to include order of priority. Additionally, a copy of the written standards of the program will be required within 30 days of submission of application.
- **Budget Revisions.** If an award is granted, the City's prior written approval will be required for any changes exceeding 20% within the consultants' line item.
- **Contact Information.** At least three contact names, phone numbers and email addresses must be provided with each application. The agency's Executive Director must be one of these three contacts. Applicants are responsible for submitting updated contact information throughout the funding year.
- **Eligibility Guidelines.** Applicant must provide direct services to homeless individuals and families or individuals and families at-risk of homelessness. Applicant is required to verify each client's eligibility status.
- **Funding Allocation.** The minimum funding for a project will be \$100,000. This may be adjusted by the department depending on state final allocation.
- **HMIS Participation.** Applicants for HHSP are required to participate and enter their data in the El Paso Homeless Management Information System (HMIS). Refer to the local requirements section of this document for detailed HMIS participation requirements.
- **Rental Assistance.** Applicants who apply to provide Rental Assistance will be required to conduct inspections of housing units for compliance with Housing Standards, Lead-Based Paint requirement Standards, Fair Market Rent and Rent Reasonableness Standards
- **Staff hours.** The City will only reimburse applicants for staff hours that are spent on direct services funded by HHSP to eligible clients.

PROGRAM PERFORMANCE

PERFORMANCE GOALS

Applicants must have the capability to track their project outcome(s) over time and report on results if the project/activity is eventually funded. Projects funded will have a contractual obligation to meet projected outcomes. Failure to meet performance outcomes, to include clients served, may result with a hold on reimbursement. Further technical assistance on this subject will be provided to funded agencies.

COMMUNITY PERFORMANCE STANDARDS

Signed into law in 2009, the HEARTH Act requires communities to implement strategies to prevent the loss of housing, help people quickly move out of homelessness and into housing and ensure housing stability (24 CFR Part 578). Therefore, communities must track and report their homeless assistance systems progress towards these outcomes (24 CFR Part 578, items 6 & 7). Performing well on these outcomes requires communities to align their systems to focus on housing-based solutions, strengthen their capacity to collect data and information across programs and improve overall system performance.

Success in achieving performance standards during the annual monitoring period along with other factors, will inform funding decisions.