



HOUSING FIRST, INC.  
the homeless coalition

# Continuum of Care Program Grants Policies & Procedures

The Continuum of Care (CoC AL-501) Program Serving Mobile County/City and Baldwin Counties

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## **PROGRAM OVERVIEW**

The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009 established the Continuum of Care (CoC) Program to replace the Supportive Housing (SHP), Shelter Plus Care (S+C) and Single Room Occupancy (SRO) Programs. The CoC program is designed to identify sheltered and unsheltered homeless persons and provide the services necessary to help those persons quickly regain stability in permanent housing after experiencing homelessness.

Housing First, Inc. has been designated lead agency by the Continuum of Care (CoC) AL-501 and assigned authority to apply for CoC Program funding on behalf of the CoC. Housing First will serve as the administrative organization, entering into sub-recipient agreements with eligible agencies for specific projects and programs. Our vision is one in which all individuals and families facing homelessness in the greater Mobile-Baldwin counties will have access to safe, decent, affordable housing and the resources and support necessary to sustain their housing and end homelessness.

The following policies and procedures have been implemented in order to outline and coordinate service expectations, manage operations, and ensure grant compliance so as to better serve the target population and the community at-large. This manual does not in any way replace the CoC Program Grant interim rule legislation, *24 CFR 578*. The following policies and procedures are meant to supplement the legislation and provide some additional limitations set by CoC AL-501 and Housing First, Inc. as the recipient (grantee). Adherence to these policies and procedures is crucial to ensure compliance with all federal, state, and local laws and regulations, and is expected of all sub-recipients.

In additions, all sub-recipients will sign agreements with Housing First for each project to ensure the operation of projects is in accordance with the provisions of the McKinney-Vento Act and all requirements under *24 CFR 578*.

### **1. COORDINATION OF SERVICES**

The CoC coordinates efforts to implement a housing and service system by strategically awarding sub-recipient contracts for CoC Program grants and Emergency Solutions Grants within the community, in consultation with the City of Mobile and Mobile County Commission. Such contracts include the following activities: Outreach, engagement, and assessment through the CoC Program, Emergency Solution Grants program and the Supportive Services for Veterans' Families (SSVF); Shelter, housing and support services through ESG and CoC Program grants; and Prevention

strategies through the ESG and SSVF Programs. The CoC continues to develop a coordinated assessment system to contribute to this system. The COC PROGRAM is designed to align and coordinate with the Emergency Solutions Grants (ESG) to meet the CoC goals for reducing and ending homelessness, as described in the Ten Year Plan, the Mobile County Action Plan and the City of Mobile Action Plan. The Continuum of Care gathers information in the Homeless Management Information System (HMIS) and provides it to the local jurisdictions as needed for the creation of Consolidated Plans. The Collaborative Applicant participates in jurisdictional meetings concerning the Consolidated Plans on behalf of the CoC, providing insight and information on the homeless situation as it relates to the Consolidated Plan.

The CoC has an assigned work group that reviews all ESG applications within the geographic area. Following the review, the CoC work group members rate the proposed projects based on funding available, project impact and other criteria as decided on by the CoC. Those who rate within the threshold are prioritized and funding is allocated by the CoC. The CA also assists the CoC by receiving ESG Funds from the State and local governments and making those funds available through a competitive RFP process, which is carried out by the CoC sub-committee dealing with ESG Funding.

The CoC conducts a yearly gaps analysis in conjunction with the Point in Time count. This is conducted by client interview and self report. Further, gaps analysis is also done periodically through a CoC commissioned needs assessment process. This analysis is completed by a third party, non-stakeholder. It includes a formal survey of area stakeholders who reported both what their agencies offered as well as asking them to report any perceived needs that they have identified.

### **1.1 Sub-recipient Application**

As the lead agency for CoC AL-501, Housing First, Inc. is authorized to execute sub-recipient agreements with eligible organizations. Eligible organizations are those that meet all of the following requirements:

- A. Incorporation as a nonprofit organization with a relevant mission
- B. A current IRS 501 (c) (3) certification letter
- C. Financial stability as verified by a recent audit or IRS 990 report
- D. A history and capacity as a provider of relevant services and financial assistance
- E. Jurisdictional / geographical capacity for serving the COC PROGRAM or ESG target populations
- F. An organizational membership in the Continuum of Care (CoC)

## G. Participation in PromisAL, the Homeless Management Information System (HMIS)

An application form is available from Housing First, Inc. for all potential applicants. Applications will be scored according to criteria described in the application form. Sub-recipient contracts will be awarded to eligible organizations based on scoring and availability of funds.

### 1.2 Referral Sources and Community Partners

211 Lifelines Family Counseling is our area's referral hub. Their services are available to all members of our community. As such, they refer a large volume of community members to all appropriate area agencies. Further, 2-1-1 also is expected to be involved in the Coordinated Assessment process as well.

The CoC is currently in the development phase for a Coordinated Intake and Assessment tool. Participation in the Coordinated Intake and Assessment program will be a requirement for all CoC programs. The first phase of Coordinated Intake and Assessment is in place as of 12/1/2013. An Outreach Team has been developed at Housing First, as well as a uniform intake packet and referral form. The team can be notified of persons presenting as homeless by calling 251-445-8016 or by e-mailing [outreach@hfal.org](mailto:outreach@hfal.org).

Referrals from all CoC members and other community partners may come through the Homeless Management Information System (HMIS). Community partners include, but are not limited to; Alabama Legal Services, Consumer Credit Counseling Services (CCCS), Mobile Community Action (MCA), Catholic Social Services (Mobile/Baldwin Counties), Franklin Primary Health Care Center, Dumas Wesley Community Center, Family Promise, The Lighthouse (Baldwin County), Ecumenical Ministries (Baldwin County), Penelope House, St. Mary's Home, The Salvation Army, Public school Systems (Mobile/Baldwin), Local Health Care Providers, Faith-based Organizations

## 2. STANDARDS FOR PROVIDING ASSISTANCE

Potential pools of participants will originate from those clients currently seeking other social services from another community agency, those identified by outreach case managers, and referrals from partner agencies. Participants' eligibility determination during the initial case management screening assessment will require that all applicable mainstream resources have been explored and applied to participant household. Upon eligibility determination participant households must be entered into the

Homeless Management Information System (HMIS). Participants seeking any social services are typically entered in the HMIS system by a professional who has been trained to conduct a basic screening assessment. All potential participant households, not fleeing domestic violence, must be entered into the HMIS.

The Homeless Coalition encourages all sub-recipients to adopt a Housing First approach.

## **2.1 Evaluating individuals and households for assistance under the CoC Program**

- Screen individual or household for eligibility criteria (See Section 2.2). Homelessness must be documented.
- Enter household data into HMIS and evaluate household vulnerability using the Self Sufficiency Outcomes Module.
- Refer household to appropriate provider through HMIS when possible.

## **2.2 Prioritizing individuals and households eligible for Transitional Housing**

Households should be prioritized according to vulnerability using the following criteria:

1. Households in immediate danger
2. Households currently on the street
3. Households with children
4. Households with a disabled individual
5. Households with no support network

## **2.3 Prioritizing individuals and households eligible for Rapid Re-Housing**

(Rapid Re-Housing is currently not available through the CoC Program, but is available through the ESG and SSVF programs)

Households should be prioritized according to vulnerability using the following criteria:

1. Households in immediate danger
2. Households currently on the street
3. Households with children
4. Households with a disabled individual
5. Households with no support network

Households receiving Rapid Re-Housing are required to contribute a portion of their monthly income according to the formula in the Participant contribution form. (Attachment [A](#))

## **2.4 Prioritizing individuals and households eligible for Permanent Supportive Housing**

Households should be prioritized according to vulnerability using the following criteria:

1. Households in immediate danger due to environment or medical status
2. Households who meet the HUD definition of chronic homelessness
3. Households currently on the street
4. Households with children
5. Households with a disabled individual
6. Households with no support network

## **2.5 Eligible Participants**

All individuals and households served with CoC Program Grant funds, regardless of which component, must meet the eligibility criteria for “homeless” under Category 1 or 4, as described in the attachment area. All applicants should be entered into the Homeless Management Information System (HMIS). (*Services for domestic violence victims are not subject to HMIS requirements.*) Upon eligibility determination participants must be referred in HMIS for services. All ineligible applicants should be referred to other appropriate resources. (Attachment [B and C](#))

## **2.6 The Housing First Model**

The Homeless Coalition encourages all sub-recipients to adopt a Housing First approach in their programs. Sub-recipients are asked to at a minimum utilize a housing first informed model for their projects. A Housing First Model would allow that homeless persons to be provided immediate access to housing and then assessed for need of and offered supportive services that may be needed to foster long - term housing stability. Eligibility would not be denied due to mental illness, substance abuse issues, criminal history, or other barriers to stability.

Further, the CoC expects that all sub-recipients would adhere to any laws regarding housing, including Fair Housing and the Alabama Landlord Tenant Law as well as any other housing laws that might apply to their program specifically. It is further expected that housing will not be denied based solely on a client’s refusal to participate in Substance Abuse treatment.

## **3. Homeless Information Management System (HMIS)**

The CoC appoints the HMIS lead agency to perform the administrative duties of HMIS. Monitoring reports performed by the system administrator include, but are not limited to; Data Quality Reports for all programs, Client Income Data quality reports, AHAR, APRs, program demographic reports, and other reports as deemed necessary by the CoC board or the HMIS administrator.

Recipients and sub-recipients are required by the CoC board to participate in the HMIS system. Sub-recipient applications are not considered without verification of participation in the HMIS. If a sub-recipient were to choose to not participate in this system, their sub-recipient agreement would be terminated and funding would be considered for reallocation.

In an effort to support consistent and effective use of the system, regular training events are held. End-User training is offered at least monthly. Training sessions offered are specific to different program types, to ensure that users are well trained in all universal data elements as well as their program-specific data elements. After the initial training there are follow up individual sessions to go over the data entered in the training site to monitor user's completeness of data entries and understanding of data entry flow. Multiple monitoring checks are performed for all new users to insure each user's competence with the system and compliance with the data standards. Additionally, tech support is offered to all users by the HMIS lead agency, Housing First, Inc. Program data quality reports are run at least twice a year to monitor data quality for each program, and random data quality checks are performed. Daily bed reports are also run twice a year to insure bed participation. End-user login reports are run monthly to insure agencies are logging into the system at least monthly to update client's records. Each sub-recipient is evaluated for compliance and participation by the lead agency at the time of their APR submission and a report is included in the project's monitoring file.

All funding awarded through the HMIS component of CoC program will be used to support the administration of the HMIS system for Mobile and Baldwin Counties. Sub-recipients are charged a HMIS fee, which is set by the CoC. This is a reimbursable cost through the HMIS budget line item in any CoC Program Grant.

#### **4. SHELTER AND HOUSING STANDARDS AND RESTRICTIONS**

## **Fair Housing Policy**

It is illegal to discriminate against any person because of Race, Color, Religion, Sex, Handicap, Familial Status, or National Origin. The Fair Housing Flyer can be found at [http://portal.hud.gov/hudportal/documents/huddoc?id=DOC\\_7802.pdf](http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_7802.pdf).

As a HUD funded program, it is our obligation to conduct all activities in accordance with the Federal Fair Housing Laws. Housing First recognizes this federal mandate and the federally protected classes in all housing related activities. All sub-recipients must display a notice of adherence to Fair Housing laws.

### **4.1 Rent Reasonableness**

Rent reasonableness as established under 24 CFR 982.507 is determined by comparing the contract rent for the unit being considered for use within the CoC Program to three other comparable units in the same area.

*Comparability.* The sub-recipient must determine whether the rent to owner is a reasonable rent in comparison to rent for other comparable unassisted units. To make this determination, the sub-recipient must consider:

- (1) The location, quality, size, unit type, and age of the contract unit; and
- (2) Any amenities, housing services, maintenance and utilities to be provided by the owner in accordance with the lease.

*Owner certification of rents charged for other units.* By accepting each monthly housing assistance payment from the sub-recipient, the owner certifies that the rent to owner is not more than rent charged by the owner for comparable unassisted units in the premises. The owner must give the sub-recipient information on rents charged by the owner for other units in the premises or elsewhere. (24 CFR 982.507 b, c)

### **4.2 Fair Market Rent**

CoC program assistance cannot be provided unless the rent plus utilities do not exceed the Fair Market Rent (FMR) amount established by HUD. FMRs are published every year for each county and are available on HUD's website, [www.hud.gov](http://www.hud.gov). When comparing the rent to the applicable FMR, the utility allowance established by the public housing authority for the area where the housing is located must be added to the monthly rent amount stated in the lease, unless all utilities are included in the lease agreement, and that total amount cannot exceed the FMR.

### **4.3 Lead-based paint**

All shelters and housing occupied by CoC Program participants must have a visual lead based paint inspection, if the unit is built before 1978. Date of construction is documented and can be verified through local tax records, and if no such records exist a written confirmation from the owner can be used. Certification that inspection had been conducted and the unit passes must be documented, where there is a child under the age of six or a pregnant woman being housed. Inspection must be conducted by personnel trained in lead-based paint inspection or by the local housing authority. Certifications included in a lease can serve as documentation of lead based paint inspection.

#### **4.4 Housing Quality Standards**

As of the first day of all 2013 grant term all housing component projects are required under 24 CFR 578.75(b) of the HEARTH Act to document that each housing unit occupied by a program participant is in compliance with the Housing Quality Standards (HQS) described in 24 CFR 982.401.

(Attachment E)

#### **4.5 Environmental Clearance**

An Environmental Clearance form must be submitted and approved by the HUD field office prior to moving a participant in or drawing funds to pay any cost on a housing unit. (Attachment D)

#### **4.6 Equal Access and Gender Identity**

The CoC will ensure equal access for individuals to programs and services in accordance with the individual's gender identity, and in a manner that affords equal access to the individual's family. As such, individuals will be placed, served, and accommodated in accordance with the gender in which he or she identifies. CoC programs will not subject an individual to intrusive questioning or request anatomical information or other physical or medical evidence of the individual's gender identity. The CoC prohibits discrimination of individuals based on their sexual orientation or gender identity.

### **5. FINANCIAL MANAGEMENT/RECORD KEEPING**

#### **5.1 Documentation**

Agency staff must verify and document eligibility prior to providing CoC program assistance. Documents relevant to the eligibility are maintained in a case file. Clients deemed ineligible for

services are documented in HMIS and referred to other community resources as appropriate.

Documents kept in the case file must include, at minimum:

- **Identification information, ALL household members, children and adults:** Social Security cards and drivers licenses for adults, birth certificates for children under 19 years.
- **Documentation of other household expenses:** Car, credit card, and any other monthly payments
- **Most recent pay stub or termination of employment document – all adults.**
- **Verification of all other household income/resources:** Social Security, SSI, SSDI, TANF, Food Stamps, Unemployment Compensation, child support and other financial assistance
- **Housing Status (Homelessness):** the only acceptable type of documentation of homelessness is a written third party verification such as one of the following:
  - Emergency Shelter Record, or
  - Homeless Certification, or
  - Shelter provider letter, or
  - Street outreach provider letter
- **COC PROGRAM Application/Intake**
- **Release of Information for HMIS**

## 5.2 Financial Management

i. Funding can be requested from the Recipient on a reimbursement basis for activities and amounts budgeted in the sub-recipient agreement/contract with the Recipient. *Reimbursement* means that the agency will incur the program expenses prior to being paid with grant funds. All HMIS data quality and service transactions must be in compliance prior to reimbursement. *Services for domestic violence victims are not subject to HMIS requirements.*

ii. All expenses being reimbursed out of CoC Program grants must be:

- allocable to the project funded by the subject grant
- eligible under 24 CFR 578 and the program NOFA for the application under which the project was funded and
- allowable under A-122, 24 CFR 84 and all applicable federal regulations

iii. Sub-recipients must submit a request for reimbursement a minimum of once every 60 days. The Collaborative Applicant will reimburse the sub-recipient agency for all eligible expenses according to the grant agreement between the CA and the sub-recipient, within 7 days of receipt of the request for reimbursement. Closeout or Final submissions must be submitted by sub-recipients within 45 days of the grant term's end. If there are any unspent funds remaining in the grant budget, by the submission of the project APR, the remaining amount is de-obligated and Continuum of Care Grantee Closeout Certification form is signed by the Collaborative Applicant as the grant recipient and executed with the HUD field office. Any de-obligated funds are recaptured by the Fort Worth Accounting Center. Repeated de-obligation of grant funds may result in the reallocation of funds to another project within the CoC, and possible termination of the project from the CoC Program.

Forms are provided in Excel format for requesting funds, detailing expenses, and tracking match. Sub-recipients must attach to all requests for reimbursement a detailed list of eligible expenses (including match) followed by documentation that evidences a consistent audit trail (receipt/invoice, payment verification, check copies, approval and procurement).

Requests for reimbursement and accompanying documentation are reviewed for compliance with the program interim rule 24 CFR 587, 24 CFR 84 and OMB Circular A-122, in addition to the annual monitoring process described below.

## **5.3 Monitoring Compliance and Performance**

### **5.3. a Performance Standards**

The five primary HUD performance goals serve to evaluate individual projects and overall CoC performance in the annual application:

1. Permanent housing for chronically homeless will be pursued with new funding and monitoring the number transitioning to independent housing thereby creating available beds;
2. Percentage staying in PH over 6 months will exceed the HUD benchmark of 77%
3. Percentage moving from TH to PH will exceed the HUD benchmark of 65%
4. Percentage employed at exit will exceed the HUD benchmark of 20%

The CoC has a Projects committee that oversees monitoring for compliance and performance for each funded project. As a result of monitoring and the APR, an annual chart that includes all projects depicts performance status as compared to other projects under PH, TH and SSO including the use of

mainstream resources. Each project re-affirms its project goals when project applications are prepared for the annual CoC competition.

### **5.3. b High risk sub-recipients**

It is Housing First, Inc.'s position that those sub-recipients who have met the following conditions will be considered high risk:

1. Those who are working on new projects for the first time.
2. Those sub-recipients who have had turnover in key staff positions or who have recently had a change in goals or direction.
3. Those sub-recipients who have had previous compliance issues or performance problems.
4. Those sub-recipients who are participating in high risk activities
5. Those sub-recipients who are undertaking multiple new projects.

High risk sub-recipients will be afforded more frequent and intensive monitoring and education to ensure that they have full understanding of the regulations as well as being able to troubleshoot any possible problems before they become non-compliance issues.

### **5.3. c Monitoring**

All Monitoring is conducted with oversight from the CoC Project committee. The Recipient reserves the right to monitor projects for progress and compliance at any time during the program year. The Recipient will monitor each project at least once annually using the HUD published guidance (Exhibit 13-1, 13-3, 13-4, and 13-8). (Attachment F)

Recipient will visit the project site for monitoring within 30 days of approving the project APR. Projects will be evaluated based on their APR, HMIS evaluation tool (attachment G) and the HUD published monitoring guidance. A copy of the sub-recipient agency's independent audit report for the most recent fiscal year is due to the recipient on the day their project is monitored All monitoring results will be compiled into a "Monitoring Report". Any concerns or instances of noncompliance will be addressed and a recommendation of corrective action will be given. Failure to comply with corrective actions will result in a negative recommendation to the CoC board for funding renewal and may result in termination of the sub-recipients contract for CoC Program funds, in which case the project may be assigned to another CoC member agency.

Any compliance or performance issues are discussed as they arise. A summary of discussion and any corrective actions required are provided to the sub-recipient in writing by the CA or by the CoC Project Committee. The written summary/report will designate the time frame in which corrective actions are required to be taken. Sub-recipients must verify in writing, with any appropriate supporting documentation, that corrective action has been completed within that time frame.

## **6. GENERAL COMPLIANCE POLICIES**

### **6.1 Written Termination of Service and Grievance Policy**

All clients receiving services have a legal right to due process of law. When services are terminated, or deemed ineligible, clients are notified in writing, regardless of the reason for the decision (household stability obtained, non-compliance with Case Plan, etc.). In the event the client has a grievance, a committee is established to review files and consider all requests. Clients have the right to reapply at any time, in the event their circumstances have changed from the original application and the client believes they are eligible for services.

**6.1. a. Termination of Services.** Participants must be given a copy of the rules and policies of the project prior to receiving services. Participants must be notified in writing if they are not in compliance. A “Final Termination” notice must be given at the time a participant is terminated from the program.

**6.1. b. Grievances.** In the event the client seeks to file a complaint, it is necessary for the client to file a complaint in writing within 10 days of the incident. The case manager must notify their supervisor.

### **6.2 Record Retention/Archiving:**

All case files and requests for reimbursement with supporting documentation shall be retained for a minimum of 5 years. Original documents should be retained on site for at least five years.

Construction programs must keep original documentation for 20 years unless the grant agreement specifies another time period. Electronic copies will reside in Homeless Management Information Systems (HMIS). *Services for domestic violence victims are not subject to HMIS requirements.*

### **6.3 Ongoing Training**

Housing First, Inc. will periodically provide on-going training to all sub-recipients in all service areas. The intent of these training opportunities is to provide updates and information concerning programmatic changes. Outside of formal trainings, Housing First provides regular updates to sub-recipients through email and our website where all can access updated forms and information.

### **6.4 Procurement Policy**

All CoC program purchases must be pre-approved by the Program Manager. Pre-approvals can be electronic (email) or hard copy. Purchases greater than \$299.99 must be accompanied by three quotes for the service or item being purchased.

### **6.5 Reporting**

The Homeless Management Information System (HMIS) will maintain participant information. It has a comprehensive set of policies and procedures based on HUD HMIS requirements, with emphasis in quality data entry, number of participants served, mainstream benefits such as temporary financial assistance, supplemental nutrition assistance; VA Health & Pension Benefits, SSI, SSDI, total monthly income, Medicaid/Medicare, housing stability activities, and client confidentiality. First-time training and annual training updates will be required of all users. *Services for domestic violence victims are not subject to HMIS requirements.*

### **6.6 Outcome Measures**

Outcome Measures and project goals are set by the recipient in consultation with sub-recipients at application time. Projects are evaluated based on the measures and goals using the Annual Progress Report (APR) and any concerns found are addressed during project monitoring.

### **6.7 Fraud Policy**

Housing First, Inc. does not tolerate fraud, waste or abuse of program funds, federal or other. All use of CoC Program funding must be in direct support of the CoC Program and be properly documented. All sub-recipients are encouraged to post information regarding reporting fraud visible to clients and personnel.

### **6.8 Conflict of Interest Policy**

The CoC will comply with the conflict of interest policy published under 24 CFR 578.95.

Members of the CoC board, its chair(s) and any person acting on behalf of the board will make known to the board any relationship to any agency who is considered for funding and recuse themselves from the discussion and decision making process for any funding for their employer, its subsidiaries, or its parent company and its subsidiaries.

## ATTACHMENTS

- A. Participant Contribution Form
- B. Homeless Definition – Recordkeeping Requirements
- C. Homeless Definition – Criteria for Defining Homeless
- D. Environmental Clearance for Project Based Rental Assistance
- E. Housing Quality Standards form and instructions
- F. Monitoring Report form and guidance
- G. HMIS Evaluation Tool